
Responses to Comments and Changes Made to the EIR/EIS

1 Public Comment

On January 12, 2024, Wildlife Services (WS-California), a state office within the U.S. Department of Agriculture’s Animal Plant and Health Inspection Service (APHIS), published the draft environmental impact report (EIR)/environmental impact statement (EIS) for the Proposed Project/Proposed Action for public comment on [regulations.gov](https://www.regulations.gov) and a Notice of Availability in the Federal Register (89 FR 2222). The California Department of Food and Agriculture (CDFA) published the draft EIR/EIS and a Notice of Availability on the California State Clearinghouse and ceqanet.opr.ca.gov (SCH No. 2020099012). All documents were also available on the California Wildlife Damage Management (WDM) EIR/EIS informational website.¹ Notifications were sent via GovDelivery and an email blast (MailChimp) to over 5,000 interested parties who requested to be informed when the EIR/EIS was available for public comment. A virtual public comment meeting was held on February 8, 2024. Public comments were accepted for 60 days, from January 12 to March 12, 2024.

A total of 3,490 comments were received, ranging from single sentence comments to multiple page letters. There were also two verbal comments made during the virtual public comment meeting. All public comments received are provided within this document and in Attachments A and B. Public comments received through [regulations.gov](https://www.regulations.gov) can also be viewed on [regulations.gov](https://www.regulations.gov), under docket number APHIS-2020-0081.²

1.1 Summary of Changes Made to the EIR/EIS

Some commenters have suggested grammatical corrections. The CDFA and WS-California are grateful to the commenters for their careful attention to detail. These suggestions have been incorporated into the final document as appropriate. In addition to minor formatting and clarifying edits, Table 1 summarizes more extensive edits that were made to the EIR/EIS; these edits did not alter the content or conclusions. Chapter 2 of this appendix includes a complete listing of the edits that were made during the finalization of the EIR/EIS.

Table 1. Summary of Edits to the EIR/EIS

EIR/EIS Section	Item	Summary of Edit
Executive Summary	Environmentally preferable alternative and environmentally superior alternative	Language was added to identify the environmentally preferable alternative and environmentally superior alternative in the Executive Summary. These will also be identified with rationale in Findings of Fact and the Record of Decision.
Executive Summary	Noise impact summary	The summary of noise impacts under each alternative was revised.

¹ California WDM EIR/EIS informational website: <https://californiawdm.org/>

² Public comments can be viewed at [regulations.gov](https://www.regulations.gov/): <https://www.regulations.gov/docket/APHIS-2020-0081>

Table 1. Summary of Edits to the EIR/EIS

EIR/EIS Section	Item	Summary of Edit
1.6.1	Scope for which the EIR/EIS is valid	Language regarding annual monitoring by the counties was added to the section.
2.2.2	CDFA WDM program description	Language regarding annual monitoring by the counties was added to the section.
2.2.2	CDFA WDM program description	Language was added regarding outreach material available, as well as services for health and safety, agricultural, and regulatory information in English and Spanish, with translation services if necessary.
2.3.2	Overview	Language regarding annual monitoring by WS-California was added to the section.
2.3.2	Overview	Language was added regarding outreach material available, as well as services for health and safety, agricultural, and regulatory information in English and Spanish, with translation services if necessary.
4.2.2 and Appendix D (BTR Section 2.3, 3.2.5, 5.0 and Appendix C6)	Sacramento Valley red fox species analysis	Added language to more clearly differentiate between Sacramento Valley red fox and the non-native red fox.
4.2.2 and Appendix D (BTR Section 3.2.9)	River otter species analysis	Added a discussion of how the data from a new source (Carroll 2020) show a thriving population of river otter, compared to the CDFA habitat model used for the EIR/EIS population estimate, which showed no suitable habitat for Marin County.
4.2.2 and Appendix D (BTR Section 3.2.1)	Black bear species analysis	Added reference to CDFW's 5-year (2019 to 2023) black bear statewide population estimate between 49,549 and 80,935 individuals (CDFW 2024). This estimate is greater than the conservative low population estimate of 20,446 used in the species analysis.
4.2.6	Impact 4 Chemical Repellents	CEQA conclusion was updated to "Less than significant with mitigation."
4.2.6 and Appendix F (Noise Report Section 3.2.2.3)	Impact 7 aerial shooting	Discussion and study references regarding impacts of aircraft noise on wildlife were added.
4.3.11	Wildfire	Added language on wildfire precautions.
Appendix A	Scoping Report	The transcript for the October 13, 2021, scoping meeting was replaced with a corrected version.
Appendix C-1	Wildlife Services risk assessments and directives	References to APHIS-WS Risk Assessments and Wildlife Services Directives were added.
Appendix C-2	Overview	CDFA language regarding Wildlife Services Directives was updated.
Appendix D (BTR Section 3.1)	Table 3-1	Gray wolf state population estimate changed from 47 to 34 based on CDFW's January to March 2024 Wolf Management Update (CDFW 2024).

Table 1. Summary of Edits to the EIR/EIS

EIR/EIS Section	Item	Summary of Edit
Appendix D (BTR Section 4.1)	Table 4-1	Grey wolf was added as a species, with the associated average non-lethal and lethal take numbers of zero.
Appendix D (BTR Appendix A)	Appendix A – Section 7 Consultations	Updated WS-California Section 7 consultations as of April 30, 2024.
Appendix E	Tribal consultations	Added summary of tribal consultation meetings.

1.2 Global or General Responses to Comments

Many public comments were identical or substantially similar. Similar comments have been combined together and a single response has been provided that covers the breadth of those comments. All of the comments received were either outside the scope of the EIR/EIS, were adequately addressed in the draft EIR/EIS, or have been addressed more clearly in the final EIR/EIS. In the interest of transparency, all comments were responded to; responses are provided below.

1.2.1 Outside the Scope

Many comments were categorically outside the scope of the EIR/EIS.

This EIR/EIS covers WDM conducted by the CDFA, WS-California, and county wildlife specialists within the State of California, as stated in Sections 1.1 through 1.4 of the EIR/EIS. All other wildlife management actions and policy decisions, especially those conducted by other agencies, are outside the scope of the EIR/EIS, including the following actions mentioned in comments:

- The CDFA, WS-California, and county wildlife specialists do not have the authority to
 - make agricultural subsidy decisions
 - regulate grazing on public lands
 - hold public votes regarding the management of Tule elk or any other wildlife population management decision
 - change federal or state congressional policies or mandates
 - require animal husbandry keepers or other members of the public to take wildlife predation prevention education
 - introduce wildlife species to the landscape (e.g., bison)
 - change cultural practices
- The EIR/EIS does not
 - propose to implement lethal gray wolf WDM
 - propose the use of rodenticide anticoagulants (e.g., brodifacoum or diphacinone)
 - require the examination of the impact of non-WDM actions, such as stocking lakes with trout on river otter behavior or roads on desert tortoise movement

1.2.2 Support Proposed Project/Proposed Action

Some comments were supportive of the Proposed Project/Proposed Action and/or agreed with the analysis in the EIR/EIS.

The following comments are supportive of the content and analysis in the EIR/EIS or provide statements with which the CDFA and WS-California categorically agree. These include the following:

- General agreement with the information, analyses, and determinations in the EIR/EIS
- Statement that WDM is a necessary tool for the protection of property, agricultural resources, natural resources, and human and companion animal health and safety
- Support for the Proposed Project/Proposed Action
- Statement that CDFA is mandated to promote and protect California’s agricultural industry and has the authority to employ hunters and trappers

1.2.3 Clarification

Some commenters requested clarification on the following topics:

- How often an EIR/EIS will be prepared.
 - As stated in Section 1.6.1, this EIR/EIS will remain valid until the CDFA or WS-California, as lead agencies, determines that new or additional needs for action (discretionary action), changed conditions, new issues, and/or new alternatives having different environmental impacts need to be analyzed (California Public Resources Code Section 21166; 14 CCR 15162). At that time, this analysis and document would be reviewed and, if appropriate, supplemented if the changes would have “environmental relevance” (40 CFR 1502.9[c]), or a new EIR/EIS would be prepared pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).
- The source of the data provided in Section 1.5, Purpose and Need, of the EIR/EIS.
 - As stated in Section 1.5.2.1 of the EIR/EIS, the species and damages listed include only those verified by WS-California from 2010 to 2019 and recorded in the California Management Information System database. The CDFA and WS-California recognize that not all wildlife damage in California is investigated and recorded by WS-California. The information in Section 1.5 of the EIR/EIS is intended to indicate the need for WDM, not to embody all monetary losses from wildlife in California. Furthermore, these losses do not include the amount of loss prevented by conducting WDM similar to that analyzed under Alternative 1 during those years. Losses would likely have been higher without this WDM.
- The proposed methods, technologies, and materials to be used for WDM.
 - The services that the CDFA, WS-California, and county wildlife specialists may provide under the Proposed Project/Proposed Action and the alternatives are described in Chapter 2 of the EIR/EIS. Specific WDM methods and tools are described in Appendix C of the EIR/EIS.
- The procedure that would follow if one of Alternatives 2 through 5 were chosen and agricultural conflicts with wildlife were not able to be resolved with non-lethal methods by the CDFA, WS-California, or county wildlife specialists.
 - As stated within the analyses of Chapter 4 of the EIR/EIS, under the condition that the CDFA, WS-California, or county wildlife specialists cannot provide lethal operational assistance, the immediate

burden of providing lethal WDM would be placed on the resource owner, other governmental agencies, private businesses, and/or private individuals.

- The purpose of Alternative 4.
 - As stated in Section 3.8.4 of the EIR/EIS, WS-California does not have the authority to establish a compensation/reimbursement program; thus, Alternative 4 is not considered under NEPA. However, Alternative 4 may be available to some California Counties (Counties). Counties that do not receive federal funds for WDM do not need to comply with NEPA on this issue. Counties that use the EIR portion of the EIR/EIS to ensure CEQA compliance for their own county program could choose to implement Alternative 4 in their own county. The analysis provided in the EIR/EIS shows that Alternative 4 would have a less than significant impact on the environment under CEQA.
- Why Mojave desert tortoise is not discussed in detail in Section 4.2.2.4.1 of the EIR/EIS.
 - As stated in Section 4.2.2.4.1, this section describes beneficial effects on special-status species and potential adverse impacts on special-status target species. Desert tortoise is not targeted during WDM; thus, potential adverse impacts on desert tortoise are not examined in this section. The species is included in Table 4.2.2-3, Threatened and Endangered Bird and Mammal Species Intended as Beneficiaries of WS-California Activities (2010–2019), of the EIR/EIS because WDM may be beneficial for desert tortoise populations (e.g., threatened and endangered [T&E] species protection, raven removal). Potential adverse impacts to non-target species are addressed in Sections 3.5.2, 4.2.2, and 4.2.4 of the EIR/EIS and Section 2.6.3 and Chapter 4 of the biological technical report (BTR) (Appendix D to the EIR/EIS). Potential impacts of WDM on desert tortoise populations are included in Section 7 consultations (Appendix A of the BTR).

1.2.4 Analysis Period

Commenters oppose the use of a programmatic planning document to evaluate adaptive WDM activities.

The EIR/EIS evaluates ongoing CDFA, WS-California, and county wildlife specialist activities, and it is anticipated that those activities will continue in the foreseeable future or until human-wildlife conflicts cease to occur. In accordance with Council on Environmental Quality (CEQ) guidance (CEQ 40 Questions, 40 CFR 1502.9, CEQ 2014 Guidance on Effective Use of Programmatic NEPA Reviews), this analysis will be reviewed as necessary to evaluate if changes to the proposed activities, new information, or changes to the human environment warrant supplementation. Chapter 2 demonstrates how the CDFA, WS-California, and county wildlife specialists use an adaptive process to apply the WDM strategies analyzed in this EIR/EIS, as well as the monitoring process that will be implemented. These tools can be adapted to almost any set of conditions and the approach is constantly adapted to site-specific circumstances. Additionally, the EIR/EIS discusses how Counties will be able to use this document in the future. Any future discretionary action for WDM activities proposed by Counties would be subject to and required to comply with CEQA and this EIR/EIS. If future proposed WDM activities are outside the scope of this EIR/EIS, then additional CEQA and/or NEPA analysis would be required. Speculative assessment as to the contents or scope of future actions by Counties is beyond the scope of CEQA and this EIR/EIS.

Further in response to NEPA-related litigation in 2017 and 2019,³ WS-California committed to replace the North and Sacramento District Mammal Damage Management Environmental Assessments (USDA 1997a, 1997b)⁴ with an EIS. The analysis contained in the California WDM EIR/EIS satisfies that commitment.

1.2.5 Transparency

Commenters assert that the CDFA, WS-California, and county wildlife specialists should provide educational materials and make more of an effort to provide education to those requesting assistance.

The CDFA and WS-California agree that education is a vital aspect of providing WDM. The CDFA, WS-California, and county wildlife specialists provide technical advice, information, education, and demonstrations. Education and other forms of technical assistance are described in Section 3.8.1.1 of the EIR/EIS, including non-lethal technical assistance. Examples of the types of WDM educational materials available to the public have been added to Sections 2.2 and 2.3. As stated in the EIR/EIS, non-lethal WDM is prioritized when appropriate and effective, including education.

Commenter requests transparency and publicly available records.

The CDFA and WS-California recognize the public interest in WDM in California and the value of providing open access to information. Annual program reports of WS-California WDM are available on the APHIS website.⁵ Finalized consultations and documents are available to tribal contacts and others upon request. Tribal consultations as of the finalization of this EIR/EIS can be found within Appendix E of the EIR/EIS. The CEQA and NEPA public scoping and comment periods offer public opportunity to provide comments on proposed projects.

Commenters request to be informed of any WS-California or CDFA WDM proposed projects.

Any individual or group may request to be included in the APHIS Stakeholder Registry⁶ and can be notified when NEPA documents for proposed projects are being initiated or are available for public comment. CEQA documents for proposed projects are available on the CEQAnet Web Portal⁷ or the California State Clearinghouse.⁸ It is impractical for the CDFA, WS-California, or county wildlife specialists to determine everyone who may have an interest in a particular proposed WDM action and to inform them prior to the need to implement it, particularly if the need for action is time sensitive.

1.2.6 California Department of Food and Agriculture

Commenter claims that the role of the CDFA under the Proposed Project/Proposed Action was not made clear during the scoping period.

The scoping period was from September 10, 2020, to November 10, 2020. The CDFA's proposed actions under the Proposed Project/Proposed Action were explained in the Notice of Preparation under the heading Program Description, which was available on the State Clearinghouse beginning on September 10, 2020. During the scoping

³ Center for Biological Diversity, et al. v. U.S. Dep't of Agriculture APHIS Wildlife Servs., et al., No. 3:19-cv-05362-LB

⁴ CENTER FOR BIOLOGICAL DIVERSITY, et al., v. USDA APHIS WILDLIFE SERVICES, et al., Case No. 3:17-cv-3564-WHA

⁵ WS-California WDM program data reports: <https://www.aphis.usda.gov/wildlife-services/publications/pdr>

⁶ APHIS Stakeholder Registry: <https://public.govdelivery.com/accounts/USDAAPHIS/subscriber/new>

⁷ CEQA documents are available on the CEQAnet Web Portal: <https://ceqanet.opr.ca.gov/>

⁸ CEQA documents are available on the California State Clearinghouse: <https://opr.ca.gov/sch/>

period, information about the Proposed Project/Proposed Action and the CDFA's involvement was also available on the California WDM joint EIR/EIS informational website (<https://californiawdm.org/>). Two virtual scoping webinars given in October 2020 included a slide describing CDFA actions under the Proposed Project/Proposed Action.

Commenter is opposed to CDFA WDM under the Proposed Project/Proposed Action.

As stated in Sections 2.2.2 and 3.7.1 of the EIR/EIS, the CDFA's reengagement is inherent to being the lead agency for the Proposed Project/Proposed Action at the state level. The CDFA's role in WDM furthers the tasks it is mandated with in the California Food and Agricultural Code (CA FAC). The CDFA is authorized and mandated to promote and protect the agricultural industry of the state (CA FAC Section 401); to enhance, protect, and perpetuate the ability of the private sector to produce food and fiber (CA FAC Section 401.5); and to prevent the introduction and spread of and/or eradicate injurious insect or animal pests, including harmful predatory animals that are damaging livestock and agricultural crops (CA FAC Sections 403, 461, 5006, 1121).

CDFA's WDM Program aims to formalize an adaptive and integrated WDM approach, act as a centralized data repository, participate in education and outreach, enact a rapid response plan for emergency WDM incidents and/or infestations, and conduct analysis of independent county integrated WDM programs. Additionally, "expanded WDM activities" are not a part of the Program Objectives, Elements, or Actions. As stated in the EIR/EIS, the activities to be conducted under the CDFA's Program framework are well-established and historically have been carried out by CDFA, the counties, and WS-California.

1.2.7 Economics

Commenters feel that taxpayer funds should not be used to provide WDM or to protect agricultural resources.

Some commenters have stated that they do not want taxpayer funds to be used to provide WDM, to benefit private commercial enterprises, or to benefit private individuals. Wildlife Services was established by Congress as the federal agency responsible for providing WDM to the people of the United States. The CDFA is authorized and mandated to promote and protect the agricultural industry of the state (CA FAC Section 401). As wildlife belongs to the American public and is managed for many uses and values by tax-supported state and federal agencies, it is national policy that some of the resolution of damage caused by those same species is also publicly supported. Federal and state funds also support research and management of wildlife-related diseases, especially those that can be transmitted to livestock, pets, and humans. Furthermore, WDM is also funded by private and commercial entities that request such services. These non-federal sources include state general appropriations, local government funds (county or city), livestock associations, tribes, and private funds, which are all applied toward program operations. Federal, state, and local officials have decided that WDM should be conducted by appropriating funds.

Commenters assert that livestock owners should accept the losses of wildlife predation.

Some persons feel that livestock producers should expect some level of loss as a cost of doing business and that the CDFA, WS-California, or county wildlife specialists should not initiate any WDM to protect agricultural resources, particularly lethal WDM. Although some losses of livestock and other agricultural resources can be expected and tolerated by agricultural producers, the CDFA and WS-California are authorized to respond to requests for WDM, and it is Wildlife Services program policy to aid requesters as warranted to minimize losses.

1.2.8 Public Lands

Commenters oppose the use of lethal WDM on public lands or use of WDM on public lands without direct U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) consultation.

As stated in Section 1.6.3 of the EIR/EIS, those conducting WDM under this EIR/EIS must acquire applicable permits and/or consult with other agencies, including USFWS and CDFW. Mitigation Measure BIO-7 states that entities conducting WDM under this EIR/EIS shall follow the protective measures in WS-California Section 7 compliance.

Wildlife Services was established by Congress as the federal agency authorized to provide WDM to the people of the United States. The CDFA is authorized and mandated to promote and protect the agricultural industry of the state (CA FAC Section 401). This includes providing WDM on public lands when requested. WDM is not conducted on public lands without coordination with the land manager (e.g., Bureau of Land Management, U.S. Forest Service) or other appropriate authority (e.g., law enforcement during a public safety emergency).

1.2.9 Non-Lethal WDM

Commenters assert that non-lethal WDM is more effective, more socially acceptable, and/or longer lasting than lethal WDM.

Non-lethal WDM methods can be effective in some circumstances. Integrative, innovative, and acceptable damage management strategies are needed to effectively reduce human/wildlife conflicts. Usually, this involves implementing an integrated damage management strategy involving both lethal and non-lethal techniques.

The CDFA and WS-California employ an integrated WDM approach to resolve conflicts with wildlife and provide protections, as discussed in Chapter 1 of the EIR/EIS. Section 1.5.2 of the EIR/EIS discusses the need for WDM practices, including the use of both non-lethal and lethal methods. Additional sections in Chapter 1, including Section 1.5.2.1 through Section 1.5.2.6, provide a detailed explanation of the methods employed across WDM situational evaluations and the corresponding activities employed. This approach involves the use of a variety of non-lethal and lethal methods appropriate to the situation. The non-lethal methods used and recommended by the CDFA, WS-California, and county wildlife specialists are used or recommended because they are expected to be effective when used in the appropriate circumstances. These methods include modifying the resource or resource area such as keeping livestock away from areas where predators have ambush cover, carcass removal, or fencing and penning. Other methods influence predator behavior such as auditory and visual deterrents and guard animals. However, when wildlife continue to damage resources and property regardless of the non-lethal methods in place, lethal methods may be considered.

Commenter claims that the EIR/EIS fails to properly consider the benefits and efficacy of non-lethal WDM over lethal WDM.

Alternative 3 examines non-lethal only operational assistance and Alternative 4 examines a financial reimbursement program that includes only non-lethal WDM reimbursement.

1.2.10 Humaneness

Commenters assert that the use of traps and snares should not be used because they are indiscriminate and inhumane.

The CDFA and WS-California understand that the use of certain WDM tools may not be acceptable to some individuals based on their values and/or beliefs. The CDFA and WS-California consider humaneness and effectiveness throughout the EIR/EIS. All methods of WDM described in Appendix C of the EIR/EIS employed under the Proposed Project/Proposed Action and the alternatives would be administered by trained wildlife specialists. The potential for traps and snares to impact non-target animals, including T&E species, was included in the analysis in Section 4.2.2 of the EIR/EIS and Chapter 4 the BTR. Potential impacts to human and animal companion safety were included in the analysis in Section 4.2.5 of the EIR/EIS. Humaneness of WDM is discussed in Section 5.5 of the EIR/EIS. Wildlife Services has reviewed the use, risk, selectiveness, and humaneness associated with tools and methods in peer-reviewed risk assessments evaluating cable restraints and snares (2019); quick-kill traps, including conibear traps (2022); and foothold traps (2019).⁹ Additionally, the CDFA, WS-California, and county wildlife specialists use WDM tools, including toxicants and other chemicals, according to federal, state, and local laws and regulations.

Traps and snares pose little risk to humans, and during the 10-year analysis period of the EIR/EIS, no humans were directly impacted by any traps or snares set by the CDFA, WS-California, and county wildlife specialists. During the analysis period (calendar years 2010–2019), the average non-target capture rate during WDM activities included 0.3 feral dogs and 0.8 feral cats annually. All non-target feral dogs and cats captured during the analysis period were released unharmed (see Section 4.2.5.3.1 of the EIR/EIS or Section 4.1 of the BTR for more details).

Traps and snares are less selective than other methods, such as shooting, as stated in Section 4.2.5.4.1 of the EIR/EIS. However, traps and snares can be highly selective when used appropriately by experienced and trained wildlife professionals, as discussed in Section 4.2.5.4.1, throughout Chapter 4, and in the BTR (Appendix D of the EIR/EIS). The CDFA, WS-California, and county wildlife specialists employ various protective measures to make all methods as selective as possible. WS-California also consults with the USFWS to minimize the likelihood that the use of traps and snares would impact any T&E species in California (Appendix A of the BTR). The CDFA and California counties that implement WDM under this EIR/EIS must also adhere to protective measures established during consultations between WS-California and the USFWS. Non-target take was discussed and analyzed in the BTR, including non-target take from traps and snares. The minimal amount of non-target take anticipated under any alternative was not determined to result in any significant impact to non-target wildlife, including T&E species (Chapter 4 of the BTR).

Commenter claims that the EIR/EIS fails to adequately assess the humaneness of certain WDM methods.

Humaneness and ethics are discussed in Section 5.5 of the EIR/EIS. The CDFA and WS-California understand that WDM may not be acceptable to some individuals based on their values and/or beliefs. The CDFA and WS-California recognize that some groups disagree with the conclusions presented in AVMA's Best Management Practices of Trapping guidelines. Traps used in the United States have undergone extensive standards testing and selection as part of an international effort to optimize trap humaneness, selectivity, and effectiveness (AVMA 2019). The analysis in the EIR/EIS is not intended to determine the correctness of one of these social positions; rather, it

⁹ Wildlife Services risk assessments are available on the APHIS website: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/programs/nepa/ct-ws-risk_assessments

examines the science related to the humaneness and the provisions in place to ensure WS-California, CDFA, and county wildlife specialists' actions are as humane as possible. Wildlife Services reviews the use, risk, and humaneness associated with the use of many traps and WDM methods in peer-reviewed risk assessments. Though these risk assessments are cited throughout the document, references to the risk assessments have been included in Appendix C of the EIR/EIS to add clarity. This addition does not substantially change the analysis or the conclusions therein.

Commenter claims that the EIR/EIS fails to adequately assess the humaneness of aerial gunning.

Commenter asserts that aerial gunning is inherently inhumane for several reasons: (1) extreme stress due to noise from the aircraft and from gunfire; (2) noise from aircraft and gunfire harm the hearing of multiple species; (3) aerial gunning forces animals to expend critical energy reserves to escape, which may affect survival and reproduction; (4) animals are often not killed by the first shot, which prolongs suffering and can allow maimed animals to escape; and (5) there is a likelihood that young will be orphaned.

In response to points 1–3, the 2019 peer-reviewed Wildlife Services risk assessment of the use of aircraft in WDM examines the risks and humaneness of aircraft on wildlife. In Section 3.2 of the Wildlife Services risk assessment on the use of aircraft in WDM, potential impacts of low-level overflights and sound are analyzed. Based on the information and analysis in the risk assessment, it is reasonable to conclude that WS-California aerial low-level flights should not cause any adverse impacts to non-target species. Clarifying language has been included in Section 4.2.6.4.2 of the EIR/EIS and Section 3.2 of Appendix F.

Point 4 about wounding rates is discussed in the 2019 peer-reviewed Wildlife Services risk assessment of the use of firearms in WDM. Shooting, when applied by a skilled and experienced shooter, is highly selective and humane, causing immediate death (AVMA 2020). The 2019 peer-reviewed Wildlife Services risk assessment of the use of firearms in WDM concluded that “because of the training and proficiency of Wildlife Services employees in the use of firearms and firearms-like devices, wounding rates should be minimal and is likely much lower than those wounding rates occurring by the public during hunting seasons.”

Commenter requests that WS-California provide data or conduct studies to verify that animals are killed after one or two passes, citing the WS-Wyoming environmental assessment. WS-California does not have data on how many passes are necessary to kill each target animal.

Commenter states that the EIR/EIS should disclose data on orphaned young, including the proportion of estimated dens found, and analyze the impacts. WS-California does not record den search efforts or estimated dens, but any coyotes taken in a den search are reported in the California Management Information System. When one coyote of a pair is killed, the other will continue to take care of the young. When both parents are killed, and if the den is not located, other adults may care for the young or they may survive on their own if they are close to weaning.

1.2.11 Alternatives

Some commenters prefer non-lethal only alternatives or prefer Alternative 5.

The CDFA and WS-California recognize that some individuals will oppose lethal WDM and that some will oppose any degree of WDM. A detailed discussion of the need for WDM can be found in Section 1.5 of the EIR/EIS. The CDFA and WS-California agree that non-lethal WDM methods can be effective in some circumstances. As stated throughout the EIR/EIS, non-lethal methods are given priority when addressing requests for assistance, when

applicable and effective. However, non-lethal methods are not necessarily recommended for every wildlife conflict; they may be deemed inappropriate or ineffective. WS-California provides federal professional leadership and expertise to meet this need and resolve wildlife conflicts to help create a balance that allows people and wildlife to coexist. The CDFA promotes and protects the agricultural industry of California. WS-California is obligated under NEPA to consider the environmental impacts of their actions in the decision-making process (40 CFR 1502.1). The purpose and function of NEPA is satisfied if federal agencies have considered relevant environmental information and the public has been informed regarding the decision-making process (40 CFR 1500.1).

Commenters recommend the consideration of an alternative that requires the documented exhaustion of non-lethal methods before implementing lethal WDM. This alternative would require that all non-lethal methods be used before any lethal operations could be implemented, including non-lethal methods that are not appropriate for the circumstances. This would result in the loss of substantial time, resources, and money for both the requester and the wildlife specialists in implementing and monitoring all these non-lethal methods, and would potentially result in large financial losses for the requester and/or a high risk of human health or safety risks (i.e., wildlife hazard management at airports) and/or major losses to T&E species (i.e., T&E protection). The CDFA and WS-California have determined that this is not a reasonable alternative. Guidance in the CEQ's 40 Most Asked Questions (46 CFR 18026) states that "reasonable alternatives must emphasize what the agency determines is 'reasonable' rather than on whether the proponent or applicant likes...a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical or economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." Under CEQA, the comparison of alternatives is designed to satisfy the requirements of CEQA Guidelines Section 15126.6(d) and Evaluation of Alternatives (14 CCR 15000 et seq.). This comparison focuses on the significant adverse impacts of the Proposed Project/Proposed Action as compared to the alternatives rather than on the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the Proposed Project/Proposed Action.

Commenter requested that the environmentally preferred alternative be identified in the EIR/EIS.

Under NEPA regulations, the environmentally preferred alternative may be identified at the time of the decision (40 CFR 1505.2). The environmentally preferred alternative the Proposed Project/Proposed Action, will be identified in the final EIR/EIS and the Record of Decision. Under CEQA, the Proposed Project/Proposed Action is the environmentally superior alternative. This has been added to the Executive Summary and will be noted in the Findings of Fact.

Commenters claim that the EIR/EIS provides flawed alternative assessments by assuming that lethal WDM is still necessary in each alternative.

A full discussion of the need for both non-lethal and lethal WDM can be found in Section 1.5 of the EIR/EIS. The data presented show that many California species affect livestock, property, humans, pets, and natural resources. The CDFA and WS-California have no authority to regulate hunting, trapping, or WDM regulations. As such, under all alternatives, private entities could legally lethally take some wildlife species at any time without a permit and can take other species with a depredation permit. Due to the need described in the EIR/EIS and the current take of wildlife by private individuals and groups, pest management companies, and independent county programs offering WDM apart from WS-California, there is no reason to believe that lethal WDM would cease in California if WS-California discontinues to offer WDM service. As such, a cumulative analysis of the impact of WS-California WDM includes the assumption that lethal WDM occurs in all alternatives, whether or not it is due to CDFA and WS-California direct assistance.

Commenters recommend that other alternatives should be considered.

Commenters recommended the consideration of a modified version of Alternative 2 that does not include WDM for agricultural resources, does not include the involvement of the CDFA, and limits the use of certain lethal WDM tools. Other alternatives recommended include (1) an alternative that does not include lethal technical assistance, (2) an alternative that requires only non-lethal methods when targeting beavers, and (3) an alternative that requires only non-lethal methods when targeting predators. These proposed alternatives are similar to other alternatives considered in the EIR/EIS. The use of non-lethal only WDM for the protection of agricultural resources is examined as part of Alternatives 2 and 3. The use of non-lethal only WDM, including when targeting beavers or predators, is examined as part of Alternatives 3 and 4. Alternative 1 does not include the involvement of the CDFA. Limiting of lethal WDM tools is examined in Alternatives 2, 3, and 4. The finer detail suggested in the commenters' proposed alternatives would not substantially alter the analysis of the effects.

Other recommended alternatives prohibited lethal WDM on public lands, including (1) an alternative that prohibits lethal WDM on public lands and (2) an alternative that prohibits lethal WDM in WAs and Wilderness Study Areas. These proposed alternatives would reduce the CDFA and WS-California's ability to meet state and federal objectives to respond to requests for WDM assistance. The analysis in the EIR/EIS shows that WDM under the Proposed Project/Proposed Action would not have significant adverse impacts on public lands or Special Designation Areas. Further restricting WDM within these locations would not change the determination of the impact.

1.2.12 Controversy

Commenters assert that lethal WDM should not be implemented because it is highly controversial.

From CEQ NEPA regulations (43 CFR 46.30): "Controversial refers to circumstances where a substantial dispute exists as to the environmental consequences of the proposed action and does not refer to the existence of opposition to a proposed action." The CDFA and WS-California generally do not dispute the conclusions of the peer-reviewed studies presented by commenters within the context for which they are written. The failure of any particular organization or person to agree with every act of an agency does not create controversy regarding effects for the purposes of NEPA or CEQA. Dissenting or oppositional public opinion, rather than concerns expressed by agencies with jurisdiction by law or expertise and/or substantial doubts raised about an agency's methodology and data, is not enough to make an action controversial. This EIR/EIS evaluates peer reviewed and other appropriate published literature, reports, and data from agencies with jurisdiction by law to conduct the impact analyses and evaluate the potential for significant impacts.

Throughout the analyses in the EIR/EIS, the best available data and information were used from expert wildlife agencies, as well as from scientific literature, especially peer-reviewed scientific literature, to inform the decision-making. If either of these factors would result in a significant impact, the analysis in the EIR/EIS would reflect that. The CDFA and WS-California consult extensively with state and federal agencies to ensure consistency with regulations and policies.

1.2.13 Chemical WDM

Commenters oppose the use of toxicants and other chemical methods for WDM, particularly DRC-1339, because of risks to non-target species, the environment, and humans and companion animals.

Any toxicant or chemical used by wildlife specialists under this EIR/EIS would be applied in compliance with federal label restrictions, state laws, and local laws. Wildlife specialists might use four methods for lethal chemical WDM under the Proposed Project/Proposed Action: DRC-1339, gas cartridges, carbon dioxide, and chemical euthanasia (Appendix C). Carbon dioxide, gas cartridges, and chemical euthanasia are extremely targeted as they are applied directly to the target animal and pose little to no risk to non-target species, the environment, and humans and companion animals. Wildlife Services reviewed the potential risks to non-target species (including companion animals), the environment, and human safety associated with the use of gas cartridges (carbon monoxide) in the 2019 peer-reviewed risk assessment and euthanasia drugs in the 2024 peer-reviewed risk assessment.¹⁰

The potential risks to non-target species, the environment, and human and companion animals from the use of DRC-1339 is examined in Section 4.2.4 of the EIR/EIS. Wildlife Services reviewed the use, risk, and humaneness associated with the use of DRC-1339 in the 2022 peer-reviewed risk assessment and concluded that the risks to non-target species, the environment, and humans and companion animals are low. Numerous studies show that DRC-1339 poses minimal risk of primary poisoning to non-target species and T&E species (EPA 1995). This can be attributed to relatively low toxicity to species that might scavenge on birds killed by DRC-1339 and DRC-1339's tendency to be almost completely metabolized in the target birds, which leaves little residue to be ingested by scavengers. As stated in Section 4.2.4 of the EIR/EIS, prior to the application of DRC-1339, WS-California personal use pre-baiting to identify non-target species and other hazards. The analysis shows that impacts from the use of DRC-1339 for WDM would not be significant.

Commenters claim that wildlife specialists intentionally or unintentionally apply DRC-1339 off-label. The CDFA, WS-California, and county wildlife specialists use toxicants and other chemicals according to federal, state, and local laws and regulations.

Commenter claims that many birds killed with DRC-1339 are not included in Wildlife Services statistics. The number of target and non-target birds estimated to be taken is determined by monitoring the bait site to see the composition and number of bird species feeding on baits and collecting carcasses after application as required by the label for the various use sites. WS-California personnel estimate take using the Wildlife Services Unified Model for Estimating DRC-1339 Bait Applications developed by the Wildlife Services National Wildlife Research Center, which takes into account species composition and number, weather, bait type, bioenergetics, dose-response, and other relevant factors. The take estimator is always being refined. The estimator results in the maximum number of birds that could be taken, which is generally higher than the number actually taken. Without these factors, take can also be estimated using species responsible for damage and grams of DRC-1339 used based on a less conservative method. For both of these methods, maximum number of birds that could be taken is assumed.

¹⁰ Wildlife Services risk assessments are available on the APHIS website: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/programs/nepa/ct-ws-risk_assessments

1.2.14 Biodiversity

Commenters assert that lethal WDM will significantly impact biodiversity and ecosystems.

Chapter 4 of the EIR/EIS and the discussion in Appendix D of the BTR evaluate these potential impacts and explain why the Proposed Project/Proposed Action would not have significant impacts to biodiversity and ecosystems.

Commenter claims that the EIR/EIS fails to properly consider the ecological impacts of removing carnivores.

The CDFA and WS-California agree that carnivores such as coyotes, bears, and mountain lions play critical roles in ecosystems and that the extirpation of these species can result in negative impacts. The EIR/EIS critically analyzes the actions outlined in the Proposed Project/Proposed Action and each of the alternatives and makes reasoned decisions based on the analysis contained in the EIR/EIS. Impacts of WDM on biodiversity and trophic cascade are discussed in Section 4.2.2.3 of the EIR/EIS and Appendix D of the BTR. Many of the studies cited by commenters evaluate dramatic and long-term population reductions or complete eradication of species, which is not analogous to the Proposed Project/Proposed Action or its alternatives. The NEPA process does not require agencies to settle disputes regarding opposing opinions or disagreements among researchers. Additionally, CEQA Guidelines Appendix G thresholds do not include disputes regarding opposing opinions or disagreements among researchers. Furthermore, the Proposed Project/Proposed Action and its alternatives do not propose to eliminate entire populations from the landscape; therefore, these studies are not applicable to this EIR/EIS.

1.2.15 Wolves

Commenters assert that the 2014 and 2020 gray wolf consultations with the USFWS are outdated and that WS-California must take a closer look at potential impacts of WDM on expanding gray wolf populations in California. Commenters also claim that the consultations are outdated due to the legal status of wolves from the 2021 delisting to the 2022 relisting.

The commenters assert that WS-California's USFWS gray wolf consultations are outdated or insufficient. The WS-California program has two current Section 7 documents on wolves in California. The first informal concurrence is dated 2014 and includes protective measures for adult wolves. The second formal consultation was initiated in 2019 and completed in 2020 in response to documented breeding events in California. The 2020 Biological Opinion (BO) reconfirmed the adult protective measures in the 2014 concurrence and added protective measures for juveniles (see Appendix A of the BTR, which is Appendix D of this EIR/EIS). The formal consultation includes an Incidental Take Permit allowing the take of up to three wolves in a 5-year period. This BO and the Incidental Take Permit were written anticipating the expansion of wolves geographically and numerically within the state. No wolves have been incidentally taken by WS-California or by County-directed WDM programs since wolves recolonized the state. As such, neither the take quantity authorized or baseline conditions set forth in the Incidental Take Permit have been exceeded and the Incidental Take Permit remains valid until July 20th, 2025. WS-California will continue to work with the USFWS and/or the National Marine Fisheries Service (NMFS) to update federal Endangered Species Act (FESA) consultations as activities or baseline conditions change in the future or document duration periods are exceeded.

While wolves were temporarily delisted during the active period of the BO, WS-California continued to implement the measures, report to the USFWS through annual monitoring, and communicate with USFWS and CDFW on wolf related issues. WS-California has confirmed with the USFWS that the temporary delisting status did not affect the validity of the consultations once wolves were relisted.

Commenter claims that the EIR/EIS and the BTR should include an analysis for gray wolf.

No lethal WDM of wolves is proposed as part of the Proposed Project/Proposed Action or the alternatives. The biological effects discussion in Section 4.2.2 of the EIR/EIS relies on the information in the BTR (Appendix D of the EIR/EIS). Due to the breadth of the species covered in the EIR/EIS, population level information for each species is contained in the BTR and a discussion of effects is included in Chapter 4 of the EIR/EIS. Thresholds for depth of population level analysis are described in Section 3.1 of the BTR. Wolves are included in Table 3-1 of the BTR. The level of analysis included for wolves is consistent with the thresholds established for all mammal species in the document. No wolves were lethally taken as target species and no unintentional take of wolves occurred during the analysis period (Table 4-1 of the BTR). Additionally, no lethal WDM of wolves is proposed as part of the Proposed Project/Proposed Action. As there was no historical take or proposed take, the threshold of take exceeding 1% of a mammal species population was not reached for more detailed analysis of wolves. Due to the federal listing status of wolves, a Section 7 consultation was completed with the USFWS; the 2020 BO by the USFWS concluded that WS-California's nonlethal WDM activities on wolves was not likely to adversely affect wolves and could be beneficial to the species by reducing conflict with livestock owners. They further concluded that the incidental take of up to three wolves in a 5-year period (though as noted above, no take has occurred) was not likely to jeopardize the species and would not preclude the continued recovery of gray wolves. Nonlethal WDM for wolves is anticipated to continue and be consistent among Alternatives 1, 2, and 3. Availability of nonlethal WDM might vary for Alternative 4, Financial Assistance, and WS-California nonlethal WDM of wolves would not exist under Alternative 5, Cessation of the WS-California program.

Commenters disagree with discussion of effects, terms and conditions, and determinations from the 2014 and 2020 WS-California gray wolf Section 7 documents.

Section 7 of FESA directs federal agencies to consult with USFWS or NMFS to ensure that actions they fund, authorize, permit, or otherwise carry out will not jeopardize the continued existence of any listed species or adversely modify designated critical habitats. WS-California has consulted with the USFWS on wolves. Informal consultations are documented in requests and concurrences. Formal consultations are documented with Biological Assessments and BOs. These documents are final and provided with the EIR/EIS as referenced materials. The commenters' disagreements with the analysis and conclusions reached in those documents are beyond the scope of this EIR/EIS.

Commenters assert that gray wolves should receive similar protective measures to San Joaquin kit fox and Sierra Nevada red fox including a range-wide ban on night shooting and lethal traps through California Fish and Game Commission and WS-California actions.

Neither WS-California nor the CDFA have the authority to change CDFW codes or regulations. As such, a request for the change of those regulations is beyond the scope of this EIR/EIS process.

WS-California and the USFWS established protective measures for wolves for WS-California WDM activities occurring in wolf activity areas throughout the state. The USFWS determined that WS-California activities were not likely to jeopardize the continued existence or recovery of the gray wolf population. Measures, terms, and conditions for activities involving shooting and the use of snares were identified in WS-California's wolf Section 7 documents (2014 and 2020). WS-California has adhered to these protective measures and no wolves have been taken during WS-California WDM activities. Through CEQA Mitigation Measure BIO-7, the Proposed Project/Proposed Action will ensure that protective measures will be adhered to by all program participants. WS-California will continue to work with the USFWS to update FESA compliance and measures as needed.

Commenter recommends that Chapter 5 of the BTR should include an analysis of the potential impacts of WDM on gray wolf populations in California.

Population level effects on species were evaluated in the BTR (Appendix D of the EIR/EIS). No wolves were taken, and that information was provided in Section 3.1 of the BTR. For FESA listed species, potential effects of individual methods and activities carried out by federal entities are reviewed as part of the Section 7 process. For wolves, these evaluations are included in 2014 and 2020 WS-California Wolf Section 7 documents, which were referenced and provided as supplemental materials.

Chapter 5 of the BTR is a summary of WDM population level impacts by county. As no lethal wolf take occurred within California, it follows that no lethal wolf take occurred within any California county. Including population level analysis of all species in every county regardless of zero take within the county would have created an even longer BTR report that would burden the public with hundreds if not thousands of additional pages to review without any pertinent biological information added to the analysis.

1.2.16 T&E Species

Commenters assert that the implementation of some WDM tools will harm T&E species, particularly wolves and desert tortoise.

Appendix C of the EIR/EIS lists all WDM tools that are available for use in California; however, use of these tools may be limited by law, regulation, policy, or other authority. For example, CDFW places restrictions on where foothold traps and snares may be used in California. Additionally, WS-California must consult with the USFWS under Section 7 of FESA before implementing WDM in areas where FESA listed species may occur. Protective measures developed during Section 7 consultations may include the restriction of certain WDM tools to minimize the potential risk to FESA species. For example, regarding wolves, no wolves were lethally taken as target species and no unintentional take of wolves occurred during the analysis period (Table 4-1 of the BTR). Additionally, no lethal WDM of wolves is proposed as part of the Proposed Project/Proposed Action. Potential risks of the use of WDM to wolves and desert tortoise were examined recently. WS-California's formal consultation with the USFWS regarding gray wolf populations was completed on July 21, 2020. Desert tortoise consultations for wildlife hazard management at airports and for T&E protection were completed on April 24, 2023, and August 17, 2021, respectively (Appendix A of the BTR). In each instance of review the USFWS found that WS-California WDM activities within the range of gray wolves and desert tortoise in California were not likely to jeopardize the survival of the species.

Commenter requests the inclusion of California Endangered Species Act (CESA) compliance documents in the EIR/EIS.

WS-California carries out the ongoing operational WDM activities analyzed as part of the Proposed Project/Proposed Action. As a federal agency, WS-California consults with the USFWS and NMFS on potential impacts to FESA listed species under Section 7 of the FESA. WS-California has approached the CDFW regarding consultation under CESA but CDFW declined to enter into consultation and instead has historically chosen to review completed Section 7 consultations for FESA listed species. The CDFA, as a state agency, and any counties with county-led programs would consult with the CDFW on potential impacts to CESA listed species as necessary. The absences of any historic unintentional take of T&E species by WS-California serves as substantial evidence that implemented protective measures developed during Section 7 consultations effectively mitigate the risk of WDM impacts on T&E species. For example, WS-California extensively consults with the USFWS on grey wolves and WS-California has never lethally or non-lethally taken a gray wolf in California. CEQA Mitigation Measure BIO-07 in Section 4.2.2.4.2 of the EIR/EIS

ensures a commitment of all agencies relying on the EIR/EIS analysis for CEQA compliance to adhere to the protective measures outlined in WS-California Section 7 documents. If CDFA initiates future operational activities as part of the Proposed Project/Proposed Action, CDFA would evaluate the location and activities for potential impacts to CESA listed species and consult with CDFW as appropriate.

1.2.17 Non-Target Species

Commenter claims that the EIR/EIS fails to adequately assess lethal WDM operations on non-target species, including T&E species.

The potential for impacts on non-target species was discussed and analyzed extensively in Sections 3.5.2, 4.2.2, and 4.2.4 of the EIR/EIS and Section 2.6.3 and Chapter 4 of the BTR. The EIR/EIS analysis determined that WDM activities conducted by the CDFA, WS-California, and county wildlife specialists would not result in any significant impacts to non-target species populations, including T&E listed species.

1.2.18 Training

Commenters assert that the CDFA, WS-California, or county wildlife specialists do not have the appropriate training or oversight to conduct WDM.

The CDFA and WS-California recognize the importance of adequate training and oversight in ensuring the effectiveness and proper use of WDM tools. As stated throughout the EIR/EIS, extensive training is required for all wildlife specialists before using traps, firearms, toxicants, and other tools. Wildlife specialists are required to be re-certified for many of these tools regularly. DRC-1339 can only be applied by Wildlife Services personnel with a certified pesticide license. Wildlife specialists learn to prioritize safe and compliant implementation practices and to consider potential impacts to the environment, non-target animals, and human safety. The CDFA and WS-California continuously improve and update training programs to ensure that wildlife specialists are up to date with emerging research and best practices.

Commenter raised concerns that, specifically, the CDFA and county wildlife specialists may not have adequate knowledge or experience to avoid non-target take of CESA or FESA listed species. Training for the use of WDM tools includes education on wildlife behavior and signs of wildlife presence to minimize non-target capture and increase effectiveness of target capture. Mitigation Measure BIO-7 states that entities conducting WDM, including CDFA and county wildlife specialists, shall follow the protective measures in WS-California Section 7 compliance. Section 7 consultation with the USFWS and NMFS ensures that wildlife specialists are aware of where FESA listed species potentially occur and when protective measures need to be implemented.

The CDFA agree that robust training is needed for wildlife specialists and intends to have appropriate training completed and pertinent operational policy Wildlife Services Directives¹¹ adopted prior to any WDM activities being performed by staff. This language has been added to Appendix C-2 to more clearly state the role of Wildlife Services Directives in the CDFA Program.

Commenter expressed concerns regarding the CDFA or county wildlife specialists implementing WDM in desert tortoise habitat. Most WDM in desert tortoise habitat is conducted by WS-California (i.e., wildlife hazard management at airports and T&E protection). Desert tortoise consultations for wildlife hazard management at

¹¹ Wildlife Services Directives are available on the USDA-APHIS website: <https://www.aphis.usda.gov/wildlife-services/directives>

airports and for T&E protection were completed on April 24, 2023, and August 17, 2021, respectively (Appendix A of the BTR). In review the USFWS found that WS-California WDM activities within the range of desert tortoise in California were not likely to jeopardize the survival of the species.

A responsibility of the CDFA under the Proposed Project/Proposed Action and Alternatives 2–4 is to provide statewide oversight of California WDM. County wildlife specialists will be required to submit annual reports of WDM actions to the CDFA. Oversight is provided by internal monitoring and by other agencies such as the USFWS and CDFW when approving permits or completing consultations.

1.2.19 Literature and Citations

Commenters claim that the EIR/EIS is missing literature and citations, and the corresponding results from these missing references have not been included in the analysis.

WS-California and the CDFA received several literature references, citations, and other document sources embedded within the respective comments that commenters asserted had not been considered during the preparation of the EIR/EIS. WS-California and the CDFA have reviewed, assessed, and categorized the provided literature during the preparation of this Final EIR/EIS (refer to Section 1.4, Responses to Literature/Citations Provided by Commenters). These reference documents have been grouped into three categories: (1) documents incorporated and cited in the EIR/EIS (Section 1.4.1), (2) documents considered but not cited in the EIR/EIS (Section 1.4.2), and (3) documents outside the scope of the EIR/EIS (Section 1.4.3).

1.3 Responses to Comments

Comment Letter A1



REGION 9

SAN FRANCISCO, CA 94105

March 7, 2024

Jeff Flores
State Director
Animal and Plant Health Inspection Service
3419A Arden Way
Sacramento, California 95825

Subject: EPA Comments on the Draft Environmental Impact Statement for the California Wildlife Damage Project, California (EIS Number 20240003)

Dear Jeff Flores:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact on any proposed federal action subject to NEPA’s environmental impact statement requirements and to make its comments public.

The Draft EIS evaluates the potential environmental consequences associated with wildlife damage management activities across California. WDM activities include collaboration and identification, education and training, technical assistance, lethal and non-lethal WDM measures, and monitoring. The Draft EIS evaluates a no action alternative and five action alternatives and does not identify a preferred alternative.

Review Summary

The EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the Final EIS. We encourage the Animal and Plant Health Inspection Service and to continue coordination and consideration of feedback from all stakeholders in selection of the preferred alternative and final mitigation measures. We offer the following recommendations to improve the EIS and the environmental outcome of the proposed project.

Project Duration

Although the Draft EIS does not address the project duration, we understand that APHIS would “amend the analysis if there are changes to the activities or environmental baseline that warrant updating” (S.

A1-1

A1-2

A1-3

Chandler, personal communication, March 6, 2024). We appreciate this commitment since an unspecified end date could result in project implementation over multiple decades. We recommend that the Final EIS define circumstances and/or a time frame to conduct an interdisciplinary review to determine if new information or changed circumstances relating to the proposed action are within the scope and range of effects considered in the original analysis. At the conclusion of this future review, we suggest the Final EIS commit to issuing a public report to determine whether a correction, supplement, or revision is needed, and if not, the reasons why.

A1-3
Cont.

Environmental Justice

We commend APHIS for its project website which enables participation of linguistically isolated populations by offering translation of four languages and interpreters upon request. We understand that APHIS has prepared outreach materials in English and Spanish and has “access to translation services if necessary to communicate with cooperators” (S. Chandler, personal communication, March 6, 2024). We recommend including this information in the Final EIS and committing to these measures in the Final EIS and Record of Decision. We also recommend including education and training for translation and interpreter services.

A1-4

We appreciate the opportunity to review this Draft EIS. When the Final EIS is released for public review, please email to samples.sarah@epa.gov. If you have any questions, please contact me at (415) 947-4167, or Sarah Samples, the lead reviewer for this project, at (415) 972-3961.

A1-5

Sincerely,

**JEAN
PRIJATEL**

Jean Prijatel
Manager

Environmental Review Section 1

Digitally signed by
JEAN PRIJATEL
Date: 2024.03.07
15:04:35 -08'00'

Response to Comment Letter A1

**U.S. Environmental Protection Agency
Jean Prijatel
March 7, 2024**

- A1-1, A1-2** Thank you for your introductory comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.
- A1-3** The analysis in the draft EIR/EIS is programmatic in nature. The Proposed Project/Proposed Action is the continuation of ongoing WS-California activities and establishment of a CDFA program to assist with monitoring, record keeping, and response to emergent WDM issues. The agencies plan to monitor the activities annually and will work together in the future to amend the analysis if there are changes to the activities or environmental baseline that warrant updating. Please also refer to Section 1.2.4, Analysis Period, and Section 1.2.5, Transparency, of this document.
- A1-4** APHIS and Wildlife Services have outreach materials and signage prepared in English and Spanish. The CDFA and WS-California also have access to translation services if necessary to communicate with cooperators. The CDFA has similar outreach material and services available for health and safety, agricultural, and regulatory information. Future project materials may also be translated upon request.
- A1-5** Thank you for your comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

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100 S. MAIN STREET, MS 16
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Making Conservation
a California Way of Life

March 11, 2024

Dr. Annette Jones
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Jeff Flores
Wildlife Services-California Animal and Plant Health Inspection Service
3419 Arden Way
Sacramento, CA 95825

RE: California Wildlife Damage Management
Project – Draft Environmental Impact
Report (DEIR)
Vic. All
GTS # 07-ALL-2024-00236
SCH # 2020099012

Dear Dr. Annette Jones and Jeff Flores:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Proposed Project is WS-California and CDFA jointly administering integrated wildlife damage management to respond to requests for assistance throughout the state. The Proposed Project/Proposed Action incorporates the establishment of a statewide CDFA wildlife damage management program and WS-California continuing to provide non-lethal and lethal operational and technical strategies to respond to requests for assistance on federal, state, tribal, municipal, and private land within the state of California. The CDFA and WS-California have evaluated the environmental impacts of managing wildlife damage and threats to agricultural resources, property, natural resources, and human health and safety. The California Department of Food and Agriculture (CDFA) and the Wildlife Services-California Animal and Plant Health Inspection Service (WS-California) are the Lead Agencies under the California Environmental Quality Act (CEQA).

After reviewing the project's DEIR, Caltrans has the following comments:

- Caltrans aims to reach zero traffic-related fatalities and serious injuries by 2050. To reach this goal, Caltrans encourages the Lead Agency to complete a traffic safety impact analysis if any work interferes with Caltrans's right-of-way (ROW).

A2-1

A2-2

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

Dr. Annette Jones, Jeff Flores
March 11, 2024
Page 2 of 2

- Please be advised that any permanent work, or temporary traffic control that encroaches onto the ROW requires a Caltrans-issued encroachment permit. Any utilities that are proposed, moved, or modified within Caltrans' ROW shall be discussed. If utilities are impacted by the program, provide site plans that show the location of existing and/or proposed utilities. These modifications will also require a Caltrans-issued encroachment permit.

As a reminder, any transportation of heavy construction equipment and/or materials that require oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

Caltrans looks forward to the future environmental documents. If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-ALL-2024-00236.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

A2-1
Cont.

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

Response to Comment Letter A2

Caltrans
Miya Edmonson
March 11, 2024

- A2-1** Thank you for your introductory comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.
- A2-2** Thank you for your comment. The CDFA and WS-California value Caltrans' feedback. The CDFA and WS-California will coordinate with Caltrans before implementing WDM within the Caltrans right-of-way and prepared additional analysis if appropriate. The CDFA and WS-California do not expect to need to implement traffic control or propose utilities. The CDFA and WS-California do not use heavy construction equipment.

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State of California
DEPARTMENT OF TRANSPORTATION

California State Transportation Agency

Memorandum

To: NIRUPAMA STALIN
Associate Transportation Planner
Division of Transportation Planning
Office of Regional and Community Planning
California Department of Transportation (HQ)

Date: February 23, 2024

From: KIMBERLY DODSON *Kimberly Dodson*
Acting LDR/Modeling/Travel Forecasting Branch Chief
Division of Planning and Local Assistance
California Department of Transportation (District 11)

Subject: CALIFORNIA WILDLIFE DAMAGE MANAGEMENT PROJECT, DEIR - SCH# 2020099012

System Planning

- Caltrans System Planning recommends incorporating further discussion of how wildlife activity may be affected by the State Highway System (SHS). There are several Comprehensive Multimodal Corridor Plans (CMCPs) that provide more information on these topics specific to SHS routes.
 - a. San Vicente CMCP (SR-67): This rural corridor is home to a variety of wildlife species from California mice to bobcats. Wildlife connectivity is vital in maintaining the diverse habitats along the San Vicente Corridor. The SR-67 CMCP further explains wildlife movement under the Corridor Users section in the CMCP.
 - b. Coast, Canyons, and Trails CMCP (SR-52): This document discusses the presence of wildlife within the Coast, Canyons, and Trails CMCP.
- Several planning documents frequently utilized by Caltrans System Planning discusses the importance of wildlife habitats, conservation, and connectivity. These documents may provide further background on state and regional planning in relation to wildland fire. Below are several examples that may be utilized.
 - a. California Transportation Plan 2050
 - b. Interregional Transportation Strategic Plan (ITSP)/ ITSP Addendum
 - c. Smart Mobility Framework 2010
 - d. SANDAG 2021 Regional Plan- Appendix Z: California State Wildlife Action Plan

A3-1

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Nirupama Stalin, Associate Transportation Planner
February 23, 2024
Page 2

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' Right-of-Way (R/W) through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

Sustainability

The existing climate hazards discussed in this document will have an impact of the transportation system. We recommend working with Caltrans on determining the preventative strategies the Caltrans can take to keep roadways operational and ensure their longevity against climate stressors such as increased temperatures, changes in precipitation patterns, wildfire, and flooding. Caltrans recognizes the central role that transportation planning plays in safety and ensuring that when these natural hazards do occur, citizens have a reliable evacuation route.

A3-2

A3-3

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

A3-4

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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Response to Comment Letter A3

Caltrans
Nirupama Stalin
February 23, 2024

- A3-1** Thank you for your comment. The CDFA and WS-California have reviewed the suggested literature. The EIR/EIS covers WDM conducted by the CDFA, WS-California, and county wildlife specialists within the State of California. Other wildlife management actions and policy decisions, such as those relating to Comprehensive Multimodal Corridor Plans and other transportation plans, are outside the scope of the document. Furthermore, WDM activities under the Proposed Project/Proposed Action are not anticipated to substantially interfere with wildlife corridors, as further discussed in Section 4.2.2, Biological Resources, of the EIR/EIS.
- A3-2, A3-3, A3-4** The CDFA and WS-California value Caltrans' feedback. The CDFA and WS-California will coordinate with Caltrans before implementing WDM within the Caltrans right-of-way and prepared additional analysis if appropriate.

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Comment Letter 01

Info CaliforniaWDM

From: Tom Hofstra <tomh@cserc.org>
Sent: Monday, February 26, 2024 1:37 PM
To: Info CaliforniaWDM
Subject: Comments from CSERC on WDM EIR/EIS
Attachments: CSERC comments.pdf

Please see attached comment letter from the Central Sierra Environmental Resource Center on the Wildlife Damage Management EIR/EIS.

Thank you,
Tom Hofstra



Central Sierra Environmental Resource Center

Box 396, Twain Harte, CA 95383 • (209) 586-7440 • fax (209) 586-4986

Visit our website at: www.cserc.org or contact us at: iohnb@cserc.org

February 26, 2024

Dr. Thomas Hofstra, Staff Ecologist
Central Sierra Environmental Resource Center
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Twain Harte, CA 95383

California WDM
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**COMMENTS IN RESPONSE TO THE
CALIFORNIA WILDLIFE DAMAGE MANAGEMENT EIR/EIS**

BACKGROUND CONTEXT FOR THESE COMMENTS

For 34 years, our non-profit conservation organization has engaged in the wide range of environmental issues affecting a vast area of more than three million acres across the central region of the Sierra Nevada. We've spent decades working on forest management issues, water issues, and many issues that affect wildlife in our area. Our biologists and other staff have spent three decades doing photo-detection and field surveys for rare wildlife species - ranging from furbearers to goshawks or California spotted owls to declining amphibian species.

Our Center has also followed the controversial issues tied to wildlife damage management policies and practices at the national level, beginning with Animal Damage Control and then with Wildlife Services. We have used FOIA in the past to request difficult-to-access Wildlife Damage Management (WDM) reports, and we have openly advocated for adjustments in WDM practices to reduce controversial actions.

In this current planning process, our Center has attended informational webinars and provided comments throughout the drawn-out scoping process. Our staff has carefully read and analyzed the EIR/EIS and its appendices and other associated documents. Based upon our decades of experience with WDM and especially predator control on both public and private lands, we believe that the following points are important to share as comments in this planning process.

01-1

COMMENTS ON THE PROPOSED PROJECT

Our staff has carefully read and considered the proposed action and offers the following comments.

Comment: CSERC is alarmed by the way the new and/or renewed role of California Department of Food and Agriculture (CDFA) in WDM is presented in the proposed project description. This major action and apparently a key purpose of the planning process was not immediately evident or made clear during previous scoping communications – nor is it clearly spelled out in the EIR/EIS. For many readers who are attempting to wade through the EIR/EIS, the manner in which the document is presented, and the description of the purpose and the proposed project do not make it explicitly evident that CDFA is aiming to re-start the State’s long-paused WDM activities.

O1-2

Comment: CSERC is opposed to CDFA renewing its role in WDM. Since 2003 (21 years) CDFA has not been involved in WDM – and all wildlife damage management responses have been successfully carried out by Wildlife Services-California (WS-CA) and by the counties. Our Center asserts that re-engaging CDFA in active WDM practices is not needed now. The proof lies in the fact that WS-CA and the counties have handled all the requested WDM activities in the State without CDFA intervening. We urge that CDFA NOT be authorized to: “...have a new role in statewide activities, formalizing a program that provides technical assistance on lethal and non-lethal techniques and/or lethal and non-lethal operational WDM assistance that is similar to WS-CA’s existing WDM activities”.

O1-3

Comment: CSERC opposes this EIS/EIR being approved for the purpose of being a programmatic planning document that entitles counties to utilize the EIS/EIR for future WDM plans that may be inconsistent with the final approval for WS-CA and for the CDFA. Our Center’s staff is alarmed at the proposed use of the EIR/EIS by counties in supporting a wide range of specific and speculative future WDM activities. As described in the documents, the final approved EIR/EIS would authorize any future county WDM activities regardless of a Federal/State decision. Counties would be empowered to make their own decisions or to implement a wide range of potentially controversial or ecologically negative activities based upon any county simply tiering a county WDM plan or action to the EIS/EIR. This is a speculative (pre-decisional) approval of undefined/unspecified county WDM activities that appears to violate clear legal requirements of CEQA and NEPA. We oppose the EIS/EIR being approved for the purpose of being a programmatic planning document for use by counties to justify their individual WDM plans.

O1-4

Comment: CSERC contends that the preferred alternative and the final selected action should provide a middle ground solution that aims to the extent feasible to represent the diversity of stakeholder positions, the objectives of CDFA and WS-CA, the general public (which supports primarily non-lethal wildlife management methods), and the legitimate health and safety needs in the State. We strongly dispute the adequacy of the proposed action due to its primarily being a continuation of the highly

O1-5

controversial patterns and practices of status quo WDM actions. As will be described in further detail below, we strongly advocate for the selection of a modified Alternative 2.

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Comment: CSERC puts forth that killing wildlife with taxpayer funds for the benefit of private, commercial business is controversial and should be avoided whenever and wherever possible.

Comments submitted during the scoping for this EIS/EIR (Appendix E of Appendix A) by those who are not directly dependent on WDM to increase profits in commercial enterprises are almost unanimously opposed to lethal, taxpayer funded methods used in support of private commercial enterprise. Supporting taxpayer funded lethal methods to benefit private commercial enterprise, as in the proposed action, would NOT be a middle ground position. At the very least, any action to assist commercial, profit seeking enterprises should at minimum require that some financial loss be proven (not just a potential expressed) prior to operational or technical assistance.

01-6

Comment: Killing of “nuisance” wildlife perpetuates an outdated, traditional, cultural practice that should be ended on moral, ethical and social, if not biological and ecological grounds.

Times have changed since public agencies began killing wildlife in support of private enterprise. While this may have been a service generally supported by the public 100 or even 50 years ago, it no longer is today. Like slavery (another outdated, unethical, traditional, cultural practice) the time to end taxpayer funded killing of native wildlife to benefit private commercial enterprise has come.

Wildlife is held in the public trust. All lethal activities should show some public benefit, rather than just for commercial profit or private whim. Lethal methods, even those promoted through technical assistance, should be restricted to reducing risk to humans and human companion animals, threatened and endangered species, invasive species management, and airport safety. Lethal methods should be targeted only at confirmed problem animals. The approved project must be shown to support the North American Model of Wildlife Conservation, based on the principle that wildlife resources are owned collectively and held in the public trust by Government for the benefit of present and future generations.

01-7

Comment: CSERC strongly opposes select lethal methods, specifically those that are indiscriminate (less than target specific), cruel or unethical, or could pose threats to humans, non-target individuals, threatened and endangered species or the environment in general.

Specifically, we oppose the use of non-discriminating methods including snares, leg hold traps, body traps, and poisons. These methods are notorious for catching or killing non-target animals. Yet it is proposed that they continue to be used in this state even though there are available alternatives, such as live (box) traps that are just as effective, have a higher targeted rate, and are more humane for the animals and the ecosystem. There should always be direct visual confirmation and observation of all potentially lethal methods at all times to insure that non-target individuals and species are not harmed.

01-8

Each year, countless fur-bearing animals are caught in snares and traps, killed in the name of “nuisance” wildlife control. Contrary to the claims of quick and humane kills made by trapping proponents, animals caught in traps often die slowly – by drowning, predation, exposure, shock, injury, or blood loss –

01-9
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sometimes after languishing for days. There are many documented occurrences of animals being caught in traps, left unchecked for days by the trapper, who were forced to attempt to chew off their limbs just to free themselves.

Leg hold traps (even padded) are inhumane and non-discriminating. Numerous accounts of the inadvertent capture of “non-targeted” animals are reported every year. This is unacceptable and demonstrates the indiscriminate nature of these devices. Any animal or person can end up in a trap, including beloved family pets and endangered wildlife. Cats and dogs have often been found too late to save their lives, suffering the same horrible deaths as wildlife. While padded traps may not have the steel grip, an animal suffers a similar fate, as they are unable to escape.

More than 88 countries and many states have banned leghold traps. In addition, many groups, including the American Veterinary Medical Association and the U.S. National Animal Control Association, have declared them inhumane.

Body grip traps (e.g. Conibear and beaver traps) are non-discriminating. These types of traps are intended to break or crush an animal’s spinal column but, as with other body-gripping traps, their efficacy and accuracy are unreliable. These devices may not quickly kill the animal, and instead result in injuries and prolonged suffering. Torturing animals by breaking their bones, crushing tissue and organs, and keeping them pinned in powerful metal jaws is not acceptable to the general public, and it’s time to evolve beyond such archaic methods of capturing wildlife.

Due to their nonselective nature, Conibear traps injure not only the wildlife species sought, but also a wide array of unintended victims, including endangered and threatened species, companion animals, and even people. In North Carolina in 2015, a 12-year-old boy was injured by a Conibear trap when he was playing near a pond in his neighborhood. It took a team of six doctors and several hours in the emergency room to pry the boy’s arm free from the trap’s metal jaws.

Snares are both inhumane and non-discriminating (including anything based on snares such as bal chatr traps). Like landmines, snares are indiscriminate, because these wire traps can't tell the difference between a fox, a family pet or a protected species. As a result, the amount and diversity of animals that fall victim to these snare traps is high. The animal is held by the snare until the person who set it returns to kill them or release them, or they die of their injuries or are killed by a predator. They might escape, but if injured they may still die later of those injuries. Snares are indiscriminate, trapping badgers, raccoons, squirrels, birds, cats, dogs, and even deer. We oppose the use of snares, but if snares are used they must at least be equipped with stops to reduce the chances of killing ensnared animals.

US Fish and Wildlife Service (USFWS) consultation documents included in the EIR/EIS indicate that they are concerned about the non-discriminatory nature of traps and snares, specifically in the case of San Joaquin kit fox and gray wolf occupied areas. There is no reason that this concern should not apply to many other threatened or endangered species and other non-listed native wildlife species as well.

Live (box) traps are just as effective, have a higher targeted rate, and are more humane for the animals and the ecosystem.

O1-9
Cont.

O1-10

Comment: CSERC strongly recommends that toxicants and other chemical methods should be prohibited.

This issue is a highly contentious among the general public because of risks and potential harm to non-target species, the environment, and humans and human companion animals. As we have already stated, removing the most controversial elements of the proposed project or selected alternative would make the Wildlife Damage Management program much more acceptable to the general public, receive less opposition, and still benefit from a wide range of effective and humane lethal methods.

01-11

Millions of birds have been poisoned by DRC-1339. Because the toxicant can take three days to act, many birds are not found and included in the agency's statistics. DRC-1339 kills target species such as blackbirds, but also poisons other species unintentionally through two processes: 1) directly: grain-eating birds consume the toxicant and die; and 2) indirectly: avian predators or scavengers eat dead or dying birds that have been poisoned by DRC-1339. While DRC-1339 is acutely toxic to granivorous birds, laboratory studies indicate that hawks and kestrels experience no adverse effects when fed starlings that had been poisoned by one-percent, active-ingredient baits. However, other carnivorous birds such as crows, ravens, owls, and magpies were more acutely sensitive to DRC-1339 than were hawks and kestrels.

Species susceptible to DRC-1339 include waterfowl, doves, galliformes, and owls. A larger non-target species list includes: savannah sparrows, killdeer, mourning doves, meadowlarks, American pipits, northern cardinals, horned larks, herring gulls, ring-necked pheasants, American robins, American tree sparrows, Canada geese, mallards, northern flickers, downy woodpeckers, dark-eyed juncos, green-winged teals, song sparrows, vesper sparrows, grasshopper sparrows, field sparrows, and rock doves. The USFWS documented that a peregrine falcon, then a listed species, died from secondary toxicity after eating starlings near a DRC-1339-baited site.

01-12

Anticoagulants may also pose secondary hazards for non-target animals. A rodent that has eaten an anticoagulant has concentrated levels of that compound in its body (especially in the liver) for several days. A predator or scavenger that consumes intoxicated rodents may receive a high dose of the toxicant, which in turn can lead to impaired clotting of their blood and death. Brodifacoum and diphacinone are particularly toxic to dogs, and have relatively long biological half-lives.

All chemicals have potential unseen and cumulative effects. Use of toxic chemicals in nature most often eventually leads to environmental harm, even if this harm is not immediately evident at the time of use (e.g. Agent Orange, DDT, methyl bromide, glyphosate, etc.). Our Center urges that any WDM action move away from the use of chemicals of any form to manage wildlife damage. At the very least, less than target specific chemicals should not be used in the vicinity of humans, pets (not closer to 500 feet from dwellings), and threatened and endangered species.

01-13

Comment: Lethal methods of Wildlife Damage Management for cooperative resource protection should not be allowed on public lands including, National Parks, National Forests, wilderness areas, game refuges and other Special Designation Areas (SDAs).

Lethal methods of WDM for human and companion animal safety, threatened and endangered species protection, airport safety, and invasive species management, on these lands should only be used with direct USFWS or California Department of Fish and Wildlife (CDFW) consultation. At the very least, Wildlife Damage Management activities on public lands and SDAs should require a separate EIS/EIR.

01-14

CONSIDERATION OF ALTERNATIVES

Comment: CSERC favors alternative 2, but still has serious concerns about new or renewed CDFA and county WDM activities, and the list of allowable lethal methods proposed. Under Alternative 2, CDFA, Counties and WS-CA would all provide lethal and non-lethal technical assistance, while these same three entities would provide only non-lethal operational assistance, except in cases of risk to human and companion animal health, protection of threatened and endangered species, and airport wildlife hazard management. **Again, we oppose new or renewed involvement of CDFA in WDM activities. Also, we oppose expanded WDM activities by counties without additional environmental review specific to and by those counties.**

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Of the alternatives proposed, Alternative 2 clearly represents the best “middle ground” alternative and is therefore preferred over the proposed project and the other proposed alternatives. The “middle ground” concessions made in Alternative 2 include the prohibition of lethal methods for operational assistance (with the exception that lethal methods would still be allowed when there is risk to human life, lives of human companion animals, protection of threatened and endangered species, and for airport safety). This **reduced reliance on lethal methods for operational assistance is a step in the right direction, and is most consistent with public views on WDM.**

01-16

Even in Alternative 2, lethal methods would continue to be allowed and promoted through technical assistance. Remember, lethal methods are controversial, non-lethal methods are not. Alternative 2 does not adequately promote non-lethal methods over lethal methods such as modification of cultural methods prior to use of lethal action. Changes to cultural practices should be required prior to lethal methods being used.

Comment: CSERC proposes “Alternative 2.5” as a modified Alternative 2 that best meets objectives while reducing controversy. Our Center strongly recommends making the following modifications to Alternative 2, resulting in what we refer to from here on as Alternative 2.5.

1) No renewed or new CDFA or county authorized Wildlife Damage Management activities shall occur. Since 2003, WS-CA and currently occurring county efforts have been sufficient to handle WDM. The EIR/EIS has not shown otherwise. Why add a third parallel agency to the already existing entities (WS-CA and the counties) already committed to wildlife damage management in California. That doesn’t seem like a cost effective use of taxpayer funds.

2) Eliminate Functional Element 1 (Cooperative Resources Protection), but keep Functional Elements 2 through 5 (Airport Wildlife Hazard Management, Endangered Species Protection, Human Health and Safety, and Invasive Species Management). Functional Elements 2-5 are generally much less controversial than Functional Element 1. Airport safety, endangered species protection, human health and safety, and invasive species management are all publicly shared benefits and should be supported with taxpayer money. On the other hand, killing native wildlife that is held in the public trust, by the government, for the sole benefit of private, for profit, business, is NOT a publicly shared benefit, and therefore should not be supported by taxes paid by the general public. Eliminating Functional Element 1 (Cooperative Resources Protection) would be a simple way to make Alternative 2.5 much more acceptable to the general public than Alternative 2.

01-17

3) Constrain the lethal methods allowed in Alternative 2 by prohibiting the use of non-discriminate, cruel, and chemical methods including leg hold and body traps, snares, and poisoned bait (e.g. DC-1339). The prohibition of these few methods would still allow a well-stocked “tool box” of lethal, but targeted and humane, methods. The use of live traps would still allow lethal management of targeted species, but would both be more discriminate, more protective of threatened and endangered species, safer for humans and companion animals and much less cruel and inhumane. **These simple alterations to Alternative 2, would make Alternative 2.5 much more acceptable to the general public.**

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Comment: CSERC does not support Alternative 1. Alternative 1 would result in no changes to Wildlife Damage Management in California – it would keep the status quo. Specifically, there would be no new CDFA or expanded county Wildlife Damage Management. Wildlife services-California and existing county involvement would continue to operate as currently. **CSERC does support this aspect of Alternative 1 - we agree that there should be no new or renewed CDFA or county Wildlife Damage Management.**

01-18

On the other hand, adoption of Alternative 1 would allow continued provision of lethal **and** non-lethal technical **and** operational assistance for cooperative resource protection (Functional Element 1). As explained above, CSERC strongly opposes lethal operational methods, except for functional elements 2 through 5 (Airport Wildlife Hazard Management, Endangered Species Protection, Human Health and Safety, and Invasive Species Management).

Comment: CSERC does not support Alternative 3. Under Alternative 3, CDFA (and in an expanded role, counties) would provide new lethal and non-lethal technical assistance for Wildlife Damage Management in addition to current WS-CA and county activities. CSERC strongly opposes this aspect of Alternative 3 - we believe that there should be no new or renewed CDFA or expanded county Wildlife Damage Management.

01-19

Also under Alternative 3, WS-CA (and CDFA and more counties) would provide only non-lethal operational assistance. Alternative 3 does not allow for any lethal operational methods. We concede that lethal operational methods are necessary in limited situations, specifically as in Functional Elements 2 through 5 (Airport Wildlife Hazard Management, Endangered Species Protection, Human Health and Safety, and Invasive Species.) CSERC therefore opposes the portion of Alternative 3 that prohibits any lethal operational methods.

Comment: CSERC does not support the inclusion of Alternative 4 in the EIS/EIR. Under Alternative 4, counties could set up programs to provide monetary compensation to affected cooperators/requestors, that would focus on funding improvements in protection from wildlife damage. There would be provision of financial reimbursement assistance to improve protection from damage by wildlife (e.g. fences and guard animals). Also, no Wildlife Damage Management operational assistance would be provided, however - private entities would still be allowed to use lethal methods. Apparently, this alternative is just a hypothetical alternative, since the EIR/EIS claims that it is “not an option in California”, and that it is included “for CEQA consideration only”.

01-20

It is not clear to our Center why an alternative that is dead on arrival is still being considered in this EIR/EIS. Why waste an alternative? This space and the time and effort put into the currently "proposed" Alternative 4 should have been used for an actually viable alternative.

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Comment: Under Alternative, 5 Wildlife Services - California would cease conducting Wildlife Damage Management. Rather WDM would be handled by other entities (e.g., tribes, USFWS, CDFW, and Counties). **Our center supports the cessation of Wildlife Damage Management by Wildlife Services – California.** We think it would be appropriate for these services to be provided by tribes, USFWS, CDFW and those counties currently providing such services. However, "we oppose expanded WDM activities by additional counties without environmental review specific to and by those counties.


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01-21

Also, under Alternative 5, no new or renewed Wildlife Damage Management activities would be conducted by CDFA. As noted previously, our center supports there being no new or renewed involvement of CDFA in Wildlife Damage Management activities, especially if they are instead conducted by tribes, USFWS and CDFW.

Thank you for the opportunity to provide these comments.



Staff Ecologist



Executive Director

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Response to Comment Letter O1

Central Sierra Environmental Resource Center
Tom Hofstra
February 26, 2024

- 01-1** Thank you for your introductory comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.
- 01-2** The CDFA and WS-California appreciate CSERC's concerns about the CDFA being authorized to have a role in WDM activities. The CDFA's Program Objectives, Elements, and Actions all have been identified in the Notice of Preparation, which was made publicly available on September 10, 2020. The CDFA's new role in WDM is noted in Section 3.7.1 of the EIR/EIS and the CDFA's reengagement is noted in Section 2.2.2 of the EIR/EIS and inherent in being the lead agency for the Proposed Project/Proposed Action at the state level. Please also refer to Section 1.2.6, California Department of Food and Agriculture, of this document.
- 01-3** As stated in Sections 2.2.2 and 3.7.1 of the EIR/EIS, the CDFA's reengagement is inherent to being the lead agency for the Proposed Project/Proposed Action at the state level. The CDFA's role in WDM furthers the tasks its mandated with in the California Food and Agricultural Code (CA FAC). The CDFA is authorized and mandated to promote and protect the agricultural industry of the state (CA FAC Section 401); to enhance, protect, and perpetuate the ability of the private sector to produce food and fiber (CA FAC Section 401.5); and to prevent the introduction and spread of and/or eradicate injurious insect or animal pests, including harmful predatory animals that are damaging livestock and agricultural crops (CA FAC Sections 403, 461, 5006, 1121). Please also refer to Section 1.2.6, California Department of Food and Agriculture.
- 01-4** Please refer to the comment response provided in Section 1.2.4, Analysis Period.
- 01-5** Please refer to the comment response provided in Section 1.2.12, Controversy. The commenter's preference for Alternative 2 is noted for the record.
- 01-6** Please refer to the comment response provided in Section 1.2.7, Economics.
- 01-7** Please refer to the comment response provided in Section 1.2.11, Alternatives.
- 01-8, 01-9, 01-10** Please refer to the comment response provided in Section 1.2.10, Humaneness.
- 01-11, 01-12, 01-13** After a diligent search of available literature and communications with the National Wildlife Research Center and USFWS libraries, the claim from a commenter that the USFWS documented a peregrine falcon fatality from secondary poisoning after eating starlings near a DRC-1339 baited site cannot be verified. The commenter did not provide any sources with a record of this event. Please refer to the comment response provided in Section 1.2.1, Outside the Scope, and Section 1.2.13, Chemical WDM.
- 01-14** Please refer to the comment response provided in Section 1.2.8, Public Lands.

01-15, 01-16 The CDFA and WS-California appreciate CSERC's concerns about the CDFA's role in WDM activities. The CDFA's proposed role in WDM furthers its legislative mandates under the CA FAC. Please refer to Section 1.2.6, California Department of Food and Agriculture.

The CDFA and WS-California agree that nonlethal WDM methods can be effective in some circumstances. As stated throughout the EIR/EIS, nonlethal methods are given priority when addressing requests for assistance, when applicable and effective. However, nonlethal methods are not necessarily recommended for every wildlife conflict; they may be deemed inappropriate or ineffective. A full discussion of the need for both nonlethal and lethal WDM can be found in Section 1.5.2 of the EIR/EIS. Please also refer to the discussion within Section 1.2.9, Non-Lethal WDM, of this document. The Proposed Project/Proposed Action does not seek to promote certain WDM methods over others in line with an integrative and adaptive approach necessary to be successful. Lastly, the CDFA, WS-California, and Counties are not authorized to require the changing of cultural practices.

The CDFA and WS-California recognize that some individuals will oppose lethal WDM. Please refer to the comment response provided in Section 1.2.11, Alternatives, of this document. Additionally, please refer to the comment response provided in Section 1.2.4, Analysis Period, regarding future discretionary actions for WDM activities by Counties and their compliance with CEQA.

01-17 The CDFA and WS-California appreciate CSERC's concerns about the CDFA's role in WDM activities. The CDFA's proposed role in WDM furthers its statutory mandates under the CA FAC. Please refer to Section 1.2.6, California Department of Food and Agriculture, of this document.

Commenter raised the concern that some WDM methods are non-discriminate. Please refer to Section 1.2.10, Humaneness, of this document.

The CDFA and WS-California appreciate the commenter's concern about taxpayer funds being used to provide WDM, sometimes to the benefit of private commercial enterprises. Please refer to Section 1.2.7, Economics, of this document.

The CDFA and WS-California understand the commenter's reference to "cooperative resource protection" to refer to lethal WDM activities in support of agricultural resources. Alternative 2 does not include lethal WDM for agricultural resources.

The alternatives analysis as presented and analyzed in this EIR/EIS is sufficient under applicable CEQA guidelines and NEPA standards. Under CEQA, the alternatives analysis is required to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. The comparison of alternatives under CEQA is designed to satisfy the requirements of CEQA Guidelines Section 15126.6(d) and Evaluation of Alternatives (14 CCR 15000 et seq.). Under NEPA and the Council on Environmental Quality regulations implementing NEPA, an EIS presents environmental impacts of the proposed project and the alternatives in comparative form (40 CFR 1502.14). Please refer to Section 3.2 of the EIR/EIS for additional detailed discussions. CEQA and NEPA do not require that an EIR or EIS be revised to include specific alternatives identified by commenters. The commenter's preferences as to appropriate alternatives are noted for the record.

01-18, 01-19 Please refer to Section 1.2.11, Alternatives. The commenter's preferences as to appropriate alternatives are noted for the record.

- 01-20** As detailed in Section 3.8.4 of the EIR/EIS, Alternative 4 is a CEQA-only alternative and would not be considered or approved under NEPA. The potential for financial reimbursement assistance under this alternative is not authorized or funded at the national level, so WS-California, the federal WDM entity, does not have a financial reimbursement assistance option available. Alternative 4 was considered and analyzed within the EIR/EIS because certain counties may be able to establish a compensation/reimbursement plan and thus would use the EIR portion of the EIR/EIS to ensure CEQA compliance for their own county program. Please also refer to Section 1.2.3, Clarification, of this document.
- 01-21** Please refer to Section 1.2.11, Alternatives. The commenter's preferences as to appropriate alternatives are noted for the record.

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Via Email

comments@CaliforniaWDM.org
info@CaliforniaWDM.org

March 12, 2024

California Wildlife Damage Management
2121 Broadway
P.O. Box 188797
Sacramento, CA 95818

**Re: Comments on California Wildlife Damage Management Project Draft
EIR/EIS**

Dear Dr. Annette Jones and Dennis Orthmeyer:

The California Farm Bureau Federation (Farm Bureau) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the State of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 29,000 agricultural, associate, and collegiate members. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Farm Bureau also aims to improve the ability of individuals engaged in production agriculture to utilize California's resources to produce food and fiber in the most profitable, efficient, and responsible manner possible guaranteeing our nation a domestic food supply. To that end, Farm Bureau actively participates in state and federal legislative, regulatory, and legal advocacy on behalf of its members.

Farm Bureau appreciates the opportunity to provide input on the California Wildlife Damage Management Joint Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). Farm Bureau supports the Proposed Project/Proposed Action in which the California Department of Food and Agriculture (CDFA) will have a new role in statewide wildlife damage management (WDM) activities with the creation of a formal program using a comprehensive, adaptive, and integrated approach with aid from Wildlife Services-California (WS-California), a state office within the U.S. Department of Agriculture's (USDA) Animal Plant and Health Inspection Service, and individual counties. Additionally, WS-California will continue to provide technical assistance on lethal and non-lethal WDM techniques, provide lethal and non-lethal operational WDM assistance, provide threatened and endangered (T&E) species protection, and manage wildlife hazard at airports as part of the program.

02-1

California WDM Project
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The Proposed Project/Proposed Action as analyzed in the Draft EIR/EIS can deliver vital services to a variety of constituencies and alleviate human/wildlife conflicts in a professional manner that is critical to the viability of California's farmers and ranchers. WDM activities minimize agricultural loss and the conversion of farmland. The proposed comprehensive program provides needed protection to California's farming and ranching communities and properties, public and private natural resource lands, human health and safety, infrastructure, T&E species, and the management of wildlife hazards at airports.

O2-2

The Draft EIR/EIS's review and analysis of the environmental impacts of current and future wildlife damage management activities in California, including management, abatement, and, where necessary, targeted removal activities is necessary and consistent with California law. As provided by California law, CDFA is mandated to promote and protect California's agricultural industry.¹ CDFA is also mandated to seek and maintain the economic well-being of agriculturally dependent rural communities in California.² Further authorities are vested with CDFA related to the prevention and introduction of animals detrimental to the agricultural industry, and the authorization to employ hunters and trappers to manage predatory animals.³ Additionally, WS-California provides additional expertise in managing wildlife conflicts with agriculture, infrastructure, private property, airport operations, and endangered species protection.⁴

O2-3

Farm Bureau believes that the development of the Draft EIR/EIS is necessary for the state and federal agencies to meet statutory obligations while also minimizing potential negative interactions between people, property, and wildlife. It is critically important that rural communities and private property owners have the ability to resolve conflicts involving wildlife that may have become habituated to depredating livestock, may be responsible for serious environmental degradation, or pose a risk to human health and safety. The Proposed Project/Proposed Action's comprehensive, adaptive, and integrated approaches utilized by the responsible agencies is not solely focused on lethal or non-lethal techniques to resolve problem wildlife, but also encourages cooperator/requestor participation and serves as an advisory role on wildlife damage prevention, depredation investigation, education, training, and technical assistance. Additionally, Farm Bureau supports a joint endeavor between WS-California and CDFA to assist in resolving potential litigation related to WDM implementation and to allow for the continuation of a successful program that provides benefits to both wildlife and human constituencies.

O2-4

¹ California Food & Agr. Code, § 401.

² Food & Agr. Code, § 401.5.

³ Food & Agr. Code, §§ 403, 461, 5006, 11221.

⁴ See the Animal Damage Control Act of March 2, 1931, (46 Stat. 1468; 7 USC 426-426b), as amended; the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988 (Public Law 100-202, 101 Stat. 1329-331; 7 USC 426c).

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Since the early 1900's, the Wildlife Services-CA Program has operated in various California counties performing a variety of wildlife damage management activities that protect human health and safety, public resources and property, and the livestock and ranching industries by addressing human/wildlife conflicts. 2010 figures from USDA show California's cattle and sheep producers lost \$5.5 million worth of livestock to predators. An assessment of the economic impact of bird and rodent damage to 22 crops in 10 counties completed by WS in 2009 estimated crop damages of up to \$504 million annually. As stated in the Draft EIR/EIS, "From 2010 to 2019, Wildlife Services-California (WS-California) recorded over \$25.4 million of confirmed losses to agriculture from wildlife damage (WS-California 2021). Approximately \$7.73 million of that damage was to livestock and rangeland. These damages come from predation of livestock by species such as coyotes and mountain lions, and damage to agricultural crops from species such as feral swine, black bears, and avian species. Confirmed losses are verified by WS-California specialists during a site visit and do not reflect actual damages, which are higher than those reported by WS-California. In reality, only a fraction of losses are reported by WS-California, and there is limited data available for Counties that do not maintain a Cooperative Service Agreement with WS-California."⁵ WDM activities help to reduce these losses by working with farmers and ranchers to implement measures to prevent damage and by removing problem wildlife.

02-5

In addition to statewide benefits, Farm Bureau's 54 County Farm Bureaus and its members benefit from the WDM activities. These individuals make their living caring for their land and livestock to produce a reliable supply of food, fiber, and timber for consumers throughout the U.S. and the world. A comprehensive, adaptive, and integrated statewide program carried out by CDFA, California counties, and WS-California helps agricultural producers who regularly face losses from wildlife appropriately respond to wildlife threatening their crops and livestock. Controlling damage caused by wildlife requires specialized skills, tools, and knowledge in wildlife behavior, agricultural practices, and regulations pertaining to this scope of work. Wildlife specialists help protect agricultural commodities, agricultural diversity, and the local food movement by assisting livestock, poultry, crop producers, and property owners in responding to damage caused by wildlife. In addition, wildlife specialists are resources for identifying and responding to threats to public health and safety such as diseased wildlife and predators entering populated areas. This includes helping agricultural producers and landowners implement practices to help prevent wildlife-caused losses and if these efforts fail, helping address the specific animal causing the problem. It is important to recognize that non-lethal methods are not always effective, and it is imperative to maintain the ability to humanely remove wildlife that are undeterred by non-lethal measures. Without the Proposed Project/Proposed Action, the resulting loss of WDM activities would significantly harm farmers and ranchers, not to mention public health and safety.

02-6

⁵ California Wildlife Damage Management Project EIR/EIS (Jan. 2024), p. 4.2.1-4.

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Thank you for the opportunity to provide our comments. Farm Bureau looks forward to further involvement and discussion with CDFA and WS-California on the California Wildlife Damage Management Project and the EIR/EIS.

02-7

Very Truly Yours,



Kari E. Fisher
Senior Counsel, Legal Services Division
California Farm Bureau

Response to Comment Letter O2

California Farm Bureau
Kari E. Fisher
March 12, 2024

02-1 through 02-7 Thank you for your supportive comments. Please refer to Section 1.2.2 Support Proposed Project/Proposed Action.

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Web: riverottterecology.org
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Instagram: [riverottterecology](https://www.instagram.com/riverottterecology)

March 12, 2024

California WDM
2121 Broadway
Sacramento, CA 95818

Via email: comments@CaliforniaWDM.org

Re: Comments on the California Wildlife Damage Management Draft EIR/EIS

Dear Sir or Madam:

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, community science and advocacy. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

During the past twelve years we have documented and researched the return of North American river otters to parts of the San Francisco Bay Area from which they were extirpated decades ago through trapping and habitat degradation. The recovery and return of these sentinel apex aquatic predators is a conservation success story, and their presence and success are important indicators of ecosystem function and environmental health.

03-1

Overall, we question the inconsistent and apparently arbitrary methodology by which “sustainable mortality thresholds” for target species are derived. It appears that the authors of the Draft EIR/EIS searched for any published report of such a threshold, regardless of the source, date, geographic focus, or purpose of the report. Having picked numbers of out of a hat, so to speak, the EIR/EIS asserts, as examples, that the human-caused mortality of 2,900 black bears, 8,700 bobcats, 114,000 coyotes, 48,000 grey foxes, 115,000 red tailed hawks, and 557 mountain lions every year would not cause population-level impacts to the individual species. No attempts are made to consider the combined or cumulative impacts of these annual levels of human-caused mortality on biodiversity, local populations, local ecosystem processes, or local prey species abundance¹.

03-2

The impact analysis for river otters is illustrative of the defects in the approach the Draft EIR/EIS takes. The analysis relies on a single report² originally produced for the purpose of justifying the commercial harvest of river otters in Illinois. Using a model based on parameter values that were largely estimated or assumed, rather than directly observed, the report concluded that a 20% annual harvest rate would result in zero population growth even though the assumed pre-harvest annual growth rate was only 11%. The report explains this incongruous result as “an artifact of the particular modeling process used.” The report never uses the term “sustainable,” and in fact argues that a much lower threshold is appropriate for a commercial harvest. Nonetheless, the Draft EIR/EIS arbitrarily adopts this 20% threshold as the standard for California’s wildlife damage management plan.

03-3

¹ For background on the consequences of lethal removal, see Petition for Rulemaking submitted to USDA Wildlife Services by Animal Legal Defense Fund et al. in November 2023: <https://aldf.org/wp-content/uploads/2023/11/Petition-for-Rulemaking-to-USDA-APHIS-Wildlife-Services-11-21-23.pdf>

² Nielsen, C. K. (2016). Modeling population growth and response to harvest for river otters in Illinois. *Journal of Contemporary Water Research & Education*, 157(1), 14-22.

In contrast, empirical data from our long-term monitoring program³ for river otters in Marin County suggests that annual population change rates vary significantly at a local level. Across 14 study sites, we found annual growth rates ranging from a high of 10% to a low of -44%, with a median of 4%. Our empirical data suggest that 20% mortality from wildlife damage management and other human causes could in no way be considered sustainable for local river otter populations.

Similarly, the Draft EIR/EIS analysis points to benefits to fisheries resources such as rainbow trout from river otter removal without noting that stocking lakes with trout can attract river otters that would otherwise not be present⁴. Nor does the analysis consider the extent to which river otters consume invasive pest species such as Signal and Red Swamp crayfish⁵. Moreover, the total documented monetary loss attributed to river otters from 2010 to 2019 was \$12,239.80 (Table 1-2). Clearly, a statewide management program involving lethal removal is disproportionate to the perceived problem.

The analyses of other target species likely suffer from similar defects, and therefore the entire analytical framework of the Draft EIR/EIS is called into question.

Ultimately, the Draft EIR/EIS must be revised in order to cure its analytical defects. The revised Draft should include an Alternative that allows only the use of non-lethal operational and technical methods and assistance. Alternative 3 would already preclude lethal methods, but would allow lethal technical assistance. An Alternative also precluding lethal technical assistance was dismissed from consideration specifically and only because non-lethal

03-4

03-5

³ Carroll, T., Hellwig, E., & Isadore, M. (2020). An approach for long-term monitoring of recovering populations of Nearctic river otters (*Lontra canadensis*) in the San Francisco Bay Area, California. *Northwestern Naturalist*, 101(2), 77-91.

⁴ Garwood, J. M. (2013). Use of historically fishless high-mountain lakes and streams by nearctic River Otters (*Lontra canadensis*) in California. *Northwestern Naturalist*, 94(1), 51-66.

⁵ Grenfell, W. E. (1974). *Food habits of the river otter in Suisun Marsh, Central California* (Doctoral dissertation, California State University, Sacramento).

methods are considered intrinsic to the proposed program's needs and objectives. The entire Draft EIR/EIS appears to be structured to support lethal removal of wildlife in California "to prevent harm to agricultural resources and property," regardless of scientific evidence that lethal removal can and does have harmful and unintended consequences. If a new Alternative is not created, Alternative 5, No Project / Cessation of WS-California, should be adopted as the Proposed Project.

03-5
Cont.

Respectfully,



Megan Isadore
Executive Director
River Otter Ecology Project

Response to Comment Letter O3

River Otter Ecology Project
Megan Isadore
March 12, 2024

03-1 Thank you for your introductory comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.

03-2 Commenter disagrees with the methodology of the river otter analysis and assert that the methodology for determining sustainable harvest thresholds was “inconsistent” and “arbitrary.” The methodology for all species analyses was to find and use all the best available science. Unfortunately, only one publication was found on river otter sustainable harvest. The fact that only one sustainable harvest report for river otter exists in the literature does not create a defective analysis. The CDFA and WS-California confirm that use of this source, which represents the only data available on this topic, is not arbitrary.

The best available data were used to make the determinations in the EIR/EIS, which included all known reports of sustainable harvest thresholds, population estimates, and density estimates for this species. The EIR/EIS analysis is limited to the available data in the published literature on this subject. Unfortunately, the search criteria for the EIR/EIS missed the valuable contribution of Carroll et al. (2020) to this topic.

The commenter asserts that “No attempts are made to consider the combined or cumulative impacts of these annual levels of human-caused mortality on biodiversity, local populations, local ecosystem processes, or local prey species abundance.” The potential impacts of all potential future actions on biodiversity, ecosystem processes, and local prey species abundance were assessed throughout the document, for each species, in the cumulative impact analyses in Section 4.2.2.4.3 of the EIR/EIS and Section 3.2 of the BTR, which include all such indirect impacts. Furthermore, an overall analysis of ecosystem function effects and trophic cascades was included in Appendix D of the BTR, which addressed these topics in more detail.

03-3, 03-4 The CDFA and WS-California appreciate the additional information regarding river otter population dynamics in California, especially the published data on this topic (Carroll et al. 2020), which was not included in the draft EIR/EIS. The data and reference have been added to the EIR/EIS analysis of river otter populations and potential impacts in California. Carroll et al. (2020) presents a thriving population of river otters where the California Department of Fish and Wildlife habitat model used for the EIR/EIS population estimate showed no suitable habitat in Marin County. These data support the assertion, stated in Section 4.2.2.4.1 of the EIR/EIS and Section 3.2.9.2 of the BTR, that the river otter population estimate in several counties was extremely conservative. Carroll et al. (2020) confirms at least 73 otters in only a handful of sites in Marin County when the EIR/EIS population estimate was zero (Table 3-10 of the BTR).

The commenter suggests that Nielsen’s 2016 study contained no empirical data. Nielsen (2016) used empirical data to construct the model used in the analysis. Regardless of Nielsen’s (2016) intent in referring to the “artifact,” Nielsen clearly states that “Harvest at 0%, 5%, 10%, and 20% levels resulted in continued population growth over time,” which fits the definition of a sustainable harvest rate.

The commenter asserts that the 4% population growth rate in Carroll et al. (2020) equates to a 4% sustainable harvest rate for the species and that this rate should be used in lieu of Nielsen (2016). The population growth rates provided in Carroll et al. (2020) for these focal study sites in Marin County are of value for river otter conservation; however, they are not sustainable harvest rates. The fact that the river otter population appears to be growing in Marin County despite anthropogenic mortality, potentially including lethal WDM similar to that analyzed in Alternative 1, supports the determination in the EIR/EIS that this limited anthropogenic mortality is sustainable. Carroll et al. (2020) supports the assessment in the EIR/EIS that WDM under Alternative 1 will not negatively impact river otter populations in California.

The CDFA and WS-California agree that documented monetary losses from river otters in California are relatively low (Table 1-2 of the EIR/EIS). However, this does not include all losses, and only includes those losses reported to WS-California, as stated in Section 1.5.2.1 of the EIR/EIS. Furthermore, these losses do not include the amount of loss prevented by conducting WDM similar to that analyzed under Alternative 1 during those years. Losses would likely have been higher without this existing WDM.

03-5

The commenter asserts that the “Draft EIR/EIS must be revised in order to cure its analytical defects.” The CDFA and WS-California find no such analytical defects and no reason to revise the EIR/EIS. The relevant and value-added information provided in Carroll et al. (2020) has been included, but the added information did not fundamentally change the analysis or conclusions of the EIR/EIS. The CDFA and WS-California affirm no “defects” in the analysis of river otter and find the assertion that the analyses of other species “likely suffer from similar defects” to be without substance. No evidence, reasoning, or specific assertions pertaining to these other analyses were provided. The CDFA and WS-California gathered the best available information in good faith on each species to assess the potential impacts of the Proposed Project/Proposed Action and the alternatives considered in the EIR/EIS.

The proposed alternatives are not functionally so different from alternatives already considered in the EIR/EIS that they would result in a different environmental impact. See Section 1.2.11, Alternatives.



March 12, 2024

Mr. Dennis Orthmeyer
USDA-APHIS Wildlife

California WDM
2121 Broadway
P.O. Box 188797
Sacramento, CA 95818

Submitted via email (info@CaliforniaWDM.org) and www.Californiawdm.org

RE: Docket No. APHIS-2020-0081; Public Comments on Environmental Impact Statement for the California Wildlife Damage Management Project

Dear Mr. Orthmeyer:

Thank you for the opportunity to submit comments on the joint environmental impact report and environmental impact statement (“draft EIR/EIS”) for the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (“APHIS”), Wildlife Services’ (“Wildlife Services” and “WS-California”) and California Department of Food and Agriculture (“CDFA”) Wildlife Damage Management (“WDM”) in California. These comments are submitted on behalf of Project Coyote, Center for Biological Diversity, Animal Welfare Institute, WildEarth Guardians, Endangered Species Coalition, Western Watersheds Project, Kettle Range Conservation Group, Wildlands Network, Northeast Oregon Ecosystems, Mountain Lion Foundation, and Environmental Protection Information Center.

O4-1

Project Coyote is a national non-profit organization whose mission is to protect North America's wild carnivores and promote compassionate coexistence through education, science, advocacy, and coalition building. Representatives, advisory board members and supporters include scientists, educators, ranchers and citizen leaders who work together to change laws and policies to protect native carnivores from abuse and mismanagement, advocating coexistence instead of killing.

The Center for Biological Diversity believes that the welfare of human beings is deeply linked to nature — to the existence in the world of a vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, the organization works to secure a future for all species, great and small, hovering on the brink of extinction. The organization does so through science, law and creative media, with a focus on protecting the lands, waters and climate that species need to survive. We want those who come after us to inherit a world where the wild is still alive.

Animal Welfare Institute is dedicated to alleviating animal suffering caused by people. We seek to improve the welfare of animals everywhere: in agriculture, in commerce, in our homes and communities, in research, and in the wild. Since 1951, AWI has advanced its mission through strategically crafted policy and legal advocacy, educational programs, research and analysis, litigation, and engagement with policymakers, scientists, industry, educators, other NGOs, the media, and the public. We seek scientifically-grounded protections for animals in all settings, and robust enforcement of those protections.

WildEarth Guardians is a non-profit organization with over 275,000 members and supporters dedicated to protecting and restoring the wildlife, wild places, wild rivers, and health of the American West. Our members, staff and board members have significant aesthetic, recreational, scientific, inspirational, educational, and other interests in the conservation and proper management of California's wildlife resources.

The Endangered Species Coalition is a nonprofit organization whose mission is to stop the human-caused extinction of our nation's at-risk species, to protect and restore their habitats, and to guide these fragile populations along the road to recovery. The Endangered Species Coalition works to safeguard and strengthen the Endangered Species Act, a law that enables every citizen to act on behalf of threatened and endangered wildlife — animals, fish, plants, and insects — and the wild places they call home.

Western Watersheds Project is a non-profit organization with more than 15,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy.

O4-1
Cont.

Wildlands Network's mission is to reconnect, restore, and rewild North American so that life- in all its diversity- can thrive. Our staff is located across the United States and Mexico, and we have been at the forefront of continental-scale conservation for 30 years. Our work is founded in science, driven by fieldwork, and furthered through strategic policy and partnerships. We strive to create an interconnected continent that supports robust wildlife populations and protects our vital ecosystems for generations to come.

Northeast Oregon Ecosystems works to protect and enhance wildlife, wildlife habitat and the ecosystems we all inhabit.

The Mountain Lion Foundation is a national non-profit corporation with staff across the United States and its headquarters in Sacramento, California. Its staff, members, and supporters work to create a world where mountain lions and people coexist, where sustainability include the persistence of the human ecosystem in harmony with viable wildlife communities, and where wildlands are nurtured and not subdued. Because nonlethal deterrence is more effective than lethal responses to depredation, the Mountain Lion Foundation works with small livestock owners and ranchers to build fencing and install deterrents that prevent conflict and promote peaceful coexistence with mountain lions in California and throughout the United States.

Founded in 1977 and based on unceded ancestral Wiyot territory in Arcata, Humboldt County, California, the Environmental Protection Information Center (EPIC) is a grassroots 501(c)(3) non-profit environmental organization that advocates for the science-based protection and restoration of Northwest California's forests, rivers, and wildlife with an integrated approach combining public education, citizen advocacy, and strategic litigation.

1. Introduction

Wildlife plays an essential role in the environment and ecological processes of the American West. In California, the role is uniquely understood, as specified in Governor Newsom's Executive Order, issued on October 7, 2020,¹ which states "California is home to more species of plants and animals than any other state, and this biodiversity accounts for about one third of all species found in the nation;" and "the California Natural Resources Agency, in consultation with the California Department of Food and Agriculture, the California Environmental Protection Agency and other state agencies, is directed to establish the California Biodiversity Collaborative (Collaborative) to bring together other governmental partners, California Native American tribes, experts, business and community leaders and other stakeholders from across California to protect and restore the State's biodiversity." It is imperative that all Wildlife Damage Management (WDM) activities such as those proposed in this draft Environmental Impact Statement/Review (EIS/EIR) must align with California's biodiversity goals.

¹ State of California, Office of the Governor. Executive Order N-82-20. October 7, 2020. Available at: <https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20-.pdf>.

O4-1
Cont.

O4-2

In contrast, Wildlife Services has lost the trust of the American public and wildlife scientists over its use of controversial animal damage control activities to primarily benefit agribusiness interests. Nationally, the Wildlife Services program has been marked by secrecy, controversy, public opposition, stale and deficient environmental reviews, and indiscriminate killings of millions of animals. Over 23.3 million animals have been reportedly killed since 2013, including tens of thousands of animals killed unintentionally, including federally and state protected species as well as domestic companion animals.² The program has removed species from landscapes and continues to suppress restoration of their populations, creating cascading direct and indirect effects that ripple throughout and degrade ecosystems. It continues to carry out its activities despite decades of criticism, conflicting and evolving societal values, and substantial gains made in humankind's understanding of animals, species, and the natural world that challenge the program's foundational underpinnings. Vast and growing evidence demonstrates that Wildlife Services' practices are not only dangerous and inhumane but also ineffective at achieving wildlife management objectives.

O4-3

Wildlife Services California (WS-California) is failing to meet its mission to "provide Federal leadership and expertise to resolve wildlife conflicts to allow people and wildlife to coexist."³ The program killed almost 1.85 million animals nationwide in 2022, per its own reporting.⁴ More specifically, at least 22,854 animals were killed, euthanized, or removed in California alone in 2022, including 17,641 native animals.⁵ Notably, the true figures are likely much higher than reported, considering Wildlife Services' history of inaccurate record keeping. Wildlife Services spends millions of dollars each year to serve concentrated private interests and special interest groups. In 2022, Wildlife Services spent almost \$149 million nationwide on wildlife killing,⁶ including over \$3 million in California.⁷ The absence of any binding regulatory framework to

O4-4

² USDA, APHIS, Wildlife Services' 2013-2022 Program Data Reports: Table G Animals Taken by Wildlife Services.

³ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Damage. Available at: <https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage>.

⁴ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Services, Program Data Report G (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX; (noting a total of 1,850,311 animals were killed/euthanized and removed/destroyed nationwide in 2022, including 1.47 million invasive wildlife and 383,731 native wildlife).

⁵ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Services, Program Data Report G – Filtered by State: California (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX; (noting 22,854 total animals were killed/euthanized and removed/destroyed by WS-California in 2022, including 5,213 invasive species).

⁶ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Services, Program Data Report A (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-A_Report&p=2022:INDEX.

⁷ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Services, Program Data Report A – Filtered by State: California (FY 2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-A_Report&p=2022:INDEX; (noting \$2,599,176 of a total of \$9,715,306 was devoted to "agriculture funding" in fiscal year 2022 in California).

govern its activities, a scathing New York Times Editorial,⁸ and coverage of growing backlash against the program,⁹ particularly over the use of dangerous and indiscriminate sodium cyanide bombs,¹⁰ demonstrate that the program has lost touch with American values that are markedly shifting towards non-lethal strategies for managing conflicts with wildlife. Instead, Wildlife Services remains rooted in the past, entrenched in a culture of killing carnivores at the expense of ecosystem health and resiliency.¹¹

O4-4
Cont.

Wildlife Services has demonstrated an institutionalized belief that wildlife like wolves, coyotes, mountain lions, and foxes do not deserve to roam free throughout their Western homelands, but instead should be subject to aggressive lethal “management” by federal and state agencies. Lethal wildlife management practices targeting carnivores, however, are anachronistic and ineffective. An extensive number of peer reviewed studies, which this comment identifies, show that there are many viable, preferable alternatives to lethal control of native carnivores, and that the environmental impacts of the highly controversial management techniques employed by Wildlife Services are much greater than previously known. Despite ongoing predator-killing, no reduction in livestock losses to predation has occurred over time.¹² This suggests that reckless lethal removal strategies that plainly contradict the best available science not only have a catastrophic impact on ecosystems, but also are ineffective at preventing and deterring predations.

O4-5

2. Legal Background

a. National Environmental Policy Act (NEPA)

The National Environmental Policy Act (“NEPA”), 42 U.S.C. § 4321, *et seq.*, is the “basic

⁸ Editorial Bd., *America’s Misnamed Agency*, N.Y. Times (July 17, 2016). Available at: <http://www.nytimes.com/2013/07/18/opinion/agricultures-misnamed-agency.html?smid=pl-share>.

⁹ Jimmy Tobias, *Should the government kill wild animals?* Pacific Standard (June 24, 2019). Available at: <https://theweek.com/articles/852116/should-government-kill-wild-animals>.

¹⁰ Todd Wilkenson, *Dog’s Death Spotlights Use of Cyanide ‘Bombs’ to Kill Predators: One of the weapons the U.S. government uses to poison predators killed a pet Labrador in Idaho, sparking new calls to ban the devices*, National Geographic (April 20, 2017). Available at: <https://www.nationalgeographic.com/news/2017/04/wildlife-watch-wildlife-services-cyanide-idaho-predator-control/>; see also Madeline Carlisle, *Trump Administration Authorizes ‘Cyanide Bombs’ to Kill Predators Again, Months After Backlash*, TIME (Dec. 5, 2019). Available at: <https://time.com/5744950/trump-cyanide-bombs/>.

¹¹ See, e.g., Christopher Ketcham, *The Rogue Agency: A USDA Program that Tortures Dogs and Kills Endangered Species*, Harper’s Magazine (Mar. 2016). Available at: <http://harpers.org/archive/2016/03/the-rogue-agency/>; Emerson Urry, *‘Secret’ Federal Agency Admits Killing 3.2 Million Wild Animals in U.S. Last Year Alone*, EnviroNews (June 27, 2016). Available at: <http://www.environews.tv/062716-feds-admit-they-killed-at-least-1-6-million-wild-animals-last-year-alone-in-u-s/>; Ben Goldfarb, *Wildlife Services and its Eternal War on Predators*, High Country News (Jan. 25, 2016). Available at: <http://www.hcn.org/issues/48.1/wildlife-services-forever-war-on-predators>.

¹² USDA-APHIS. *Death Loss Trends in the U.S. Cattle Industry: 1990-2015; Cattle Death Loss Study 2015*. January 2023. Retrieved Mar 7, 2024 from https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle-death-loss-1990-2015-info.pdf.

O4-6

charter for protection of the environment.” 40 C.F.R. § 1500.1(a); *Dept. of Transp. v. Pub Citizen*, 541 U.S. 752, 756 (2004). In enacting NEPA, Congress declared a national policy of “creat[ing] and maintain[ing] conditions under which man and nature can exist in productive harmony.” *Or. Natural Desert Ass’n v. Bureau of Land Mgmt.*, 531 F.3d 1114, 1120 (9th Cir. 2008) (quoting 42 U.S.C. § 4331(a)). NEPA was adopted to “promote efforts which will prevent or eliminate damage to the environment and biosphere” in order to “fulfill the responsibility of each generation as trustee of the environment for succeeding generations.” 42 U.S.C. §§ 4321, 4331(b)(1). NEPA is intended to “ensure that [federal agencies] . . . will have detailed information concerning significant environmental impacts” and “guarantee[] that the relevant information will be made available to the larger [public] audience.” *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998).

Under NEPA, before a federal agency takes a major federal action that significantly affects the quality of the environment, the agency must prepare an environmental impact statement. *Kern v. U.S. Bureau of Land Mgmt.*, 284 F.3d 1062, 1067 (9th Cir. 2002) (quoting 43 U.S.C. § 4332(2)(C)); 40 C.F.R. § 1502.9. “An EIS is a thorough analysis of the potential environmental impact that ‘provide[s] full and fair discussion of significant environmental impacts and . . . inform[s] decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.’” *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 387 F.3d 989, 993 (9th Cir. 2004) (citing 40 C.F.R. § 1502.1). An EIS is NEPA’s “chief tool” and is “designed as an ‘action-forcing device to [e]nsure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government.’” *Or. Natural Desert Ass’n*, 531 F.3d at 1121 (quoting 40 C.F.R. § 1502.1).

An EIS must discuss the following issues: (i) the environmental impact of the proposed action, (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented, (iii) alternatives to the proposed action, (iv) the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. 42 U.S.C. § 4322. An EIS must identify and analyze the direct, indirect, and cumulative effects of the proposed action. Indirect effects include “growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” 40 C.F.R. § 1508.8 (2019). Cumulative effects are defined as “the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions.” *Id.* § 1508.7 (2019). This analysis requires more than “general statements about possible effects and some risk” or simply conclusory statements regarding the impacts of a project. *Klamath Siskiyou Wildlands Center*

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v. Bureau of Land Management, 387 F.3d 989, 995 (9th Cir. 2004) (citation omitted); *Or. Natural Resources Council v. Bureau of Land Management*, 470 F.3d 818, 822-23 (9th Cir. 2006). An EIS must consider the environmental impacts (and appropriate mitigation measures) not only for its proposed action, but also for a set of reasonable alternatives.

Under NEPA’s implementing regulations,¹³ “significantly” requires consideration of both context and intensity. 40 C.F.R. § 1508.27 (2019). “Context” refers to the scope of the activity, including the affected region, interests, and locality, which varies with the setting of the action, and includes both short and long-term effects. 40 C.F.R. 1508.27(a) (2019). “Intensity” refers to the severity of impact, as determined by consideration of ten factors. 40 C.F.R. § 1508.27(b); *see also Blue Mtns. Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998). In that case, the BLM failed to adequately evaluate both the “context” and “intensity” of the proposal.

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b. California Environmental Quality Act (CEQA)

In enacting the California Environmental Quality Act (“CEQA”), the California Legislature declared its intention that “all public agencies responsible for regulating activities affecting the environment give prime consideration to preventing environmental damage when carrying out their duties.” *Mountain Lion Found. v. Fish & Game Comm’n*, 16 Cal. 4th 105, 112 (Cal. 1997). The Supreme Court of California has explained that CEQA is to be interpreted “to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Id.* CEQA serves to inform government decision makers and the public about the potential, significant environmental effects of proposed activities, identify ways that environmental damage can be avoided or significantly reduced, and prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. 14 CCR § 15002(a).

O4-7

Prior to the approval of a project, CEQA requires that the lead agency prepare an Environmental Impact Report (EIR) if the agency “finds substantial evidence that the project may have a significant effect on the environment.” Cal. Pub. Resources Code § 21165. An EIR

¹³ On July 16, 2020, the Council on Environmental Quality (“CEQ”) issued an Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act. 85 Fed. Reg. 43,304 (July 16, 2020). 40 C.F.R. § 1506.13 addresses the effective date of the new regulations: “The regulations in this subchapter apply to any NEPA process begun after September 14, 2020. An agency may apply the regulations in this subchapter to ongoing activities and environmental documents begun before September 14, 2020.” On April 20, 2022, CEQ issued the Phase 1 Final Rule, which took effect on May 20, 2022 and finalized a narrow set of changes to generally restore regulatory provisions that were in effect for decades before the 2020 rule modified them for the first time. On July 31, 2023, CEQ issued National Environmental Policy Act Implementing Regulations Revisions Phase 2 which will be finalized later this year. As requested in our scoping comments, CDEA and WS-California applied the prior version of CEQ’s implementing NEPA regulations, which have been in use for decades and which have been the subject of considerable litigation.

is a public document that is “used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage.” 14 CCR § 15002(f). The EIR has been aptly described as the “heart of CEQA.” 14 CCR § 15003(a).

CEQA requires the public agency to consider feasible alternatives to the project that would lessen any significant adverse environmental impact. Cal. Pub. Resources Code §§ 21002, 21081. The Legislature has defined “feasible,” for purposes of CEQA review, as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Pub. Resources Code, § 21061.1; *see also* 14 CCR § 15126(d) (providing that an EIR must “[d]escribe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives”). One alternative must be “no project.” 14 CCR § 15126(d)(2).

Under CEQA, a public agency must also consider measures that might mitigate a project’s adverse environmental impact and adopt them if feasible. Cal. Pub. Resources Code §§ 21002, 21081. The public agency “bears the burden of affirmatively demonstrating that, notwithstanding a project’s impact on the environment, the agency’s approval of the proposed project followed meaningful consideration of alternatives and mitigation measures.” *Cal. Clean Energy Comm. v. City of Woodland*, 225 Cal. App. 4th 173, 203 (Cal. Ct. App. 2014).

As part of the CEQA review process, the action agency must also provide written responses to significant environmental objections prior to the agency’s final decision. 14 CCR §§ 15132(d), 15362(b). Articulating reasons for rejecting opposing views in written form “helps sharpen the [] understanding of the significant points raised.” *Mountain Lion Found. v. Fish & Game Comm’n*, 16 Cal. 4th 105, 123 (Cal. 1997).

c. The Endangered Species Act (ESA)

Congress passed the ESA in 1973 to “provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, [and] to provide a program for the conservation of such endangered species and threatened species” 16 U.S.C. § 1531(b). Under Section 7 of the ESA, Congress charged every federal agency with the duty to conserve imperiled species, which the ESA explicitly elevates over the primary missions of federal agencies. 16 U.S.C. § 1536(a). In furtherance of this duty, the ESA requires every federal agency to obtain review and clearance for activities that may affect listed species or their habitat from the U.S. Fish and Wildlife Services (USFWS) or the National Marine Fisheries Service (NMFS). If an activity authorized, funded, or carried out by a federal agency may affect a listed species or its designated critical habitat, that activity cannot go forward until consultation with USFWS or NMFS to ensure that it will not jeopardize the species or result in the destruction or

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O4-8

adverse modification of designated critical habitat. 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a).

Furthermore, the listing of a species under the ESA triggers prohibitions under Section 9 of the Act, 16 U.S.C. § 1538, including the prohibition on the “take” of species, which includes “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” 16 U.S.C. § 1532(18). The prohibitions in Section 9 of the ESA encompass “incidental take,” or take that is not a direct goal of the proposed action. During Section 7 consultation, if USFWS or NMFS concludes that take will not jeopardize the species, then the agency may issue an Incidental Take Statement that specifies the impacts of the incidental take on the species, mitigation measures, reporting requirements, and any other terms and conditions with which the action agency must comply. 16 U.S.C. § 1536(b)(4)(C).

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d. The Wilderness Act

Lethal WDM violates the express terms of the Wilderness Act, 16 U.S.C. §§ 1131-1136. Congress enacted the Wilderness Act to “secure for the American people of present and future generations the benefits of an enduring resource of wilderness.” 16 U.S.C. § 1131(a). The Act defines Wilderness as “an area of undeveloped Federal land retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions.” *Id.* § 1131(c). Congress mandated agencies to preserve the untrammeled nature and natural conditions of wilderness. *Id.* These fundamental tenets of wilderness stewardship were reiterated in a program review initiated by the USDA Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service and U.S. Geological Survey by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight “fundamental principles” for stewardship emphasized the need to preserve the wildness in nature. As the Pinchot report stated, “Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness Since wildness is a fundamental characteristic of wilderness that is not attainable elsewhere (Pinchot Institute for Conservation 2001).” By contrast, lethal WDM manipulates natural conditions in an attempt to prevent commercial livestock losses for the perceived benefit of the private agricultural industry.

O4-9

3. **General Concerns Over DEIS**

- a. Draft EIR/EIS fails to properly consider the impacts of conducting WDM in Congressionally Designated Wilderness Areas, contravening the Wilderness Act

O4-10

In our scoping comment, we noted WDM, including killing native predators, is inconsistent with statutory mandates governing Wilderness Areas in California.¹⁴ WDM activities will alter the natural and untrammelled conditions of Wilderness by killing native predators. WS-California and CDFA assume that WDM is allowed within designated Wilderness merely because the Wilderness Act does not expressly prohibit it. WS-California in the draft EIR/EIS fails to disclose how the actions it plans to conduct in its proposed action and the methods it plans to use are consistent (or not consistent) with the mandate to preserve natural, untrammelled, and undeveloped conditions imposed by the Act, or any additional mandates imposed by each Wilderness's establishing legislation.

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- i. Lethal WDM in Wilderness is antithetical to preserving its natural conditions

To secure an enduring resource of wilderness, Congress required agencies that administer federal land “to preserve its wilderness character.” 16 U.S.C. § 1133(b). The Ninth Circuit determined that “[a]lthough the Act stresses the importance of wilderness areas as places for the public to enjoy, it simultaneously restricts their use in any way that would impair their future use as wilderness” and “[t]his responsibility is reiterated in Section 1131(b), in which the administering agency is charged with preserving the wilderness character of the wilderness area.” *High Sierra Hikers Ass’n v. 12 Blackwell*, 390 F.3d 630, 648 (9th Cir. 2004) (emphasis in original). Because lethal WDM serves to protect commercial interests as opposed to wilderness interests or national wilderness policy, it violates the Act’s mandate to manage Wilderness “so as to preserve its natural conditions.” 16 U.S.C. § 1131(c). Lethal WDM within Wilderness is unambiguously

O4-11

¹⁴ California’s Wildernesses are: Agua Tibia, Ansel Adams, Argus Range, Avawatz Mountains, Beauty Mountain, Big Maria Mountains, Bigelow Cholla Garden, Bighorn Mountain, Bighorn Mountain, Black Mountain, Bright Star, Bristol Mountains, Bucks Lake, Buzzards Peak, Cache Creek, Cadiz Dunes, Cahuilla Mountain, Caribou, Carrizo Gorge, Carson-Iceberg, Castle Crags, Cedar Roughs, Chanchelulla, Chemehuevi Mountains, Chimney Peak, Chuckwalla Mountains, Chumash, Cleghorn Lakes, Clipper Mountain, Coso Range, Coyote Mountains, Cucamonga, Darwin Falls, Dead Mountains, Death Valley, Desolation, Dick Smith, Dinkey Lakes, Domeland, El Paso Mountains, Elkhorn Ridge, Emigrant, Farallon, Fish Creek Mountains, Funeral Mountains, Garcia, Golden Trout, Golden Valley, Granite Chief, Granite Mountain, Grass Valley, Great Falls Basin, Hain, Hauser, Havasu, Hollow Hills, Hoover, Ibex, Imperial Refuge, Indian Pass, Inyo Mountains, Ishi, Jacumba, Jennie Lakes, John Krebs, John Muir, Joshua Tree, Kaiser, Kelso Dunes, Kiavah, King Range, Kingston Range, Lassen Volcanic Wilderness, Little Chuckwalla Mountains, Little Picacho, Machesna Mountain, Magic Mountain, Malpais Mesa, Manly Peak, Marble Mountain, Matilija, Mecca Hills, Mesquite, Milpitas Wash, Mojave, Mokelumne, Monarch, Mount Lassic, Mt. Shasta, Newberry Mountains, Nopah Range, North Algodones Dunes, North Fork, North Mesquite Mountains, Old Woman Mountains, Orocopa Mountains, Otay Mountain, Owens Peak, Owens River Headwaters, Pahrump Valley, Palen/McCoy, Palo Verde Mountains, Phillip Burton, Picacho Peak, Pine Creek, Pinto Mountains, Piper Mountain, Piute Mountains, Pleasant View Ridge, Red Buttes, Restrung Spring Range, Rice Valley, Riverside Mountains, Rocks and Islands, Rodman Mountains, Russian, Sacatar Trail, Saddle Peak Hills, San Gabriel, San Geronio, San Jacinto, San Mateo Canyon, San Rafael, Sanhedrin, Santa Lucia, Santa Rosa, Sawtooth Mountains, Sequoia-Kings Canyon, Sespe, Sheep Mountain, Sheephole Valley, Silver Peak, Siskiyou, Snow Mountain, Soda Mountains, South Fork Eel River, South Fork San Jacinto, South Nopah Range, South Sierra, South Warner, Stateline, Stepladder, Surprise Canyon, Sylvania Mountains, Thousand Lakes, Trilobite, Trinity Alps, Turtle Mountains, Ventana, Whipple Mountains, White Mountains, Yolla Bolly-Middle Eel, Yosemite, and Yuki. See Wilderness Connect for Practitioners: Advanced Wilderness Search, available at <https://wilderness.net/practitioners/wilderness-areas/search.php#resultsSection>. Last Accessed on Feb. 26, 2024.

contrary to the plain language of the Wilderness Act. Where an agency “is not managing the wilderness but acting contrary to wilderness policy for the benefit of outsiders,” the agency violates the Wilderness Act. *Sierra Club v. Lyng*, 662 F. Supp.40, 42 (D.D.C. 1987) (holding “[t]he destruction of many acres of pine trees by chain sawing, and chemical spraying . . . is hardly consonant with preservation and protection of these areas in their natural state”). Like the destructive conduct in *Lyng*, lethal WDM is expressly intended to manipulate natural wilderness conditions (i.e., removing native wildlife that influence natural ecological processes) to protect commercial livestock. By authorizing lethal WDM that intentionally manipulates the natural ecosystem to benefit the livestock industry, it fails to preserve the “natural condition” of Wilderness in violation of the Act’s mandate. 16 U.S.C. § 1131(c). Lethal removal of predators from Wilderness Areas impairs several qualities that make up wilderness character—i.e., that Wilderness Areas are untrammeled, natural, and provide opportunities for primitive and unconfined recreation.

O4-11
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ii. Lethal WDM is Impermissible within Wilderness

Lethal WDM is an impermissible “commercial enterprise” within Wilderness. To preserve the character of Wilderness, Congress intentionally prohibited and limited certain activities. Accordingly, the Wilderness Act sets forth “a broad prohibition on the operation of all commercial enterprise within a designated wilderness, except as ‘specifically provided for in the Act.’” *Wilderness Soc’y v. U.S. Fish and Wildlife Serv.* (*Wilderness Soc’y*), 353 F.3d 1051, 1063 (9th Cir. 2003) (en banc) (quoting 16 U.S.C. § 1133(c)). Though Congress specifically provided for “the grazing of livestock, where established prior to [1964],” *see* § 1133(d)(4), Wildlife Services improperly invokes this exception to justify killing native wildlife within Wilderness to protect commercial livestock. Congress did not specifically provide an exception for killing native wildlife in Wilderness for this commercial purpose. Consequently, WS-California’s proposed WDM activities within Wilderness constitute an impermissible “commercial enterprise,” in violation of the Act. *Wilderness Soc’y*, 353 F.3d at 1062 (prohibition on commercial enterprises must be strictly enforced whenever one of the “specific and express” exceptions are not present). Wildlife Services proposed WDM activities fall squarely within the Ninth Circuit’s en banc decision in *Wilderness Soc’y* that held “Congress absolutely proscribed commercial enterprise in the wilderness.” *Wilderness Soc’y*, 353 F.3d at 1063. Applying traditional canons of statutory construction, the Court analyzed the language, purpose, and structure of the Wilderness Act to determine that a “commercial enterprise” is a “project or undertaking of or relating to commerce” with a primarily commercial “purpose and effect.” *Id.* at 1060-1062, 1064. Wildlife Services’ WDM activities in Wilderness purportedly serve to prevent losses of commercial livestock upon request from private livestock producers. Just as the effect of the salmon enhancement project in *Wilderness Soc’y* was “to aid commercial enterprise of fishermen,” 353 F.3d at 1065, here the effect of WDM is to aid the commercial livestock industry because WDM’s purpose and effect is to benefit the commercial livestock industry.

O4-12

Lethal WDM within Wilderness cannot be implicitly read into the Wilderness Act's specific exception for "the grazing of livestock." 16 U.S.C. § 1133(d)(4). "Where Congress explicitly enumerates certain exceptions to a general prohibition, additional exceptions are not to be implied." *United States v. Smith*, 499 U.S. 160, 167 (1991) (citations omitted); *see also, Comm'r of Internal Revenue v. Clark*, 489 U.S. 726, 739 (1989) ("In construing provisions . . . in which a general statement of policy is qualified by an exception, we usually read the exception narrowly in order to preserve the primary operation of the provision."). The plain language of the Act's specifically enumerated exception for "the grazing of livestock" does not include killing or otherwise "managing" native wildlife to reduce the perceived threat that wild animals pose to domestic sheep and cattle. 16 U.S.C. § 1133(d)(4). Nor do the Congressional Grazing Guidelines, which direct livestock grazing to continue in Wilderness "where established prior to classification", address "predator control" or expressly mention "managing" wildlife for the protection of livestock within Wilderness.¹⁵ Killing native wildlife to protect commercial livestock is flatly inconsistent with the express purpose of the Act to preserve the area "as wilderness . . . unimpaired for future use and enjoyment" and "untrammelled by man." 16 U.S.C. § 1133(c).

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iii. Impacts to Forest Service Wilderness Areas

In our scoping comment we requested a detailed analysis of how any activities proposed in Wilderness will comply with the statutory mandates, regulations, policy guidance, Wilderness management plans, and land use plans governing each Wilderness in California. In lieu of any detailed analysis, the draft EIR/EIS provides a blanket disclaimer stating WS-California and CDFA will follow all "applicable laws, WS Directives (only applicable to WS-California personnel), memoranda of understanding, regulations, management plans, Minimum Requirements Analyses, and land management agency policies".¹⁶ However, the EIS/EIR fails to properly consider or interpret Forest Service manuals and Bureau of Land Management manuals and guidance documents on Wilderness and thereby restrictions that apply to WDM activities.

The Forest Service Manual 2300 – Recreation, Wilderness, And Related Resource Management at Chapter 2320 - Wilderness Management¹⁷, provides guidance for WDM activities in Wilderness Areas managed by the Forest Service. The protection of wilderness is elevated above all other concerns in the Forest Service Manual's Wilderness Management Chapter's "Management of Wildlife and Fish" sections:

04-13

2323.31 - Objectives (*directly quoted from the manual*)

¹⁵ Congressional Grazing Guidelines. 8560 - Management of Designated Wilderness Areas. House Report 96-1126.

See: <https://winapps.umn.edu/winapps/media2/wilderness/toolboxes/documents/grazing/House%20Report%2096-1126.pdf>

¹⁶ EIR/EIS at 5.6.

¹⁷ Forest Service Manual Chapter 2320 - Wilderness Management. Amendment Number 2300-2007-1 See: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053277.pdf

- Provide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist.
- Consistent with objective 1, protect wildlife and fish indigenous to the area from human caused conditions that could lead to Federal listing as threatened or endangered.
- Provide protection for known populations and aid recovery in areas of previous habitation, of federally listed threatened or endangered species and their habitats.

The above objectives are plainly inconsistent with the draft EIR/EIS proposed project. Lethal WDM is the use of “human actions” to “determine which and what numbers of wildlife species will exist” and is, therefore, action that is directly opposite of that stated in the first objective. Extermination of sensitive and ESA candidate species risks introducing “human caused conditions” that “lead to Federal listing.” Finally, extermination of predators does not “provide protection” of wilderness resources nor does it aid in the recovery of species. Instead it interferes with natural ecosystem function and dynamics and social and ecological processes of targeted species.

O4-13
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2323.32 - Policy (*directly quoted from the manual*)

- Recognize that States have jurisdiction and responsibilities for the protection and management of wildlife and fish populations in wilderness. Cooperate and work closely with State wildlife and fish authorities in all aspects of wildlife and fish management. Base any Forest Service recommendation to State wildlife and fish agencies on the need for protection and maintenance of the wilderness resource. Recognize wilderness protection needs and identify any needed requirements in coordination efforts and in cooperative agreements with State agencies.
- Wildlife and fish management programs shall be consistent with wilderness values.
- Discourage measures for direct control (other than normal harvest) of wildlife and fish populations.
- Manage wilderness to protect known populations of federally listed threatened or endangered species where necessary for their perpetuation and aid in their recovery in areas of previous habitation. When alternative areas outside of wilderness offer equal or better protection, take actions to recover threatened or endangered species outside of wilderness areas first.
- Apply the "Policies and Guidelines for Fish and Wildlife Management in Wilderness and Primitive Areas," developed jointly by the Forest Service, Bureau of Land Management, and the International Association of Fish and Wildlife Agencies in a practical, reasonable, and uniform manner in all National Forest wilderness units. Use the guidelines as a foundation for or as addendums to State or individual wilderness cooperative agreements.

O4-14

The myth of state wildlife supremacy (Nie et al. 2017) has been thoroughly debunked. The claim that the state of California or any other state has the ultimate say over wildlife management on federal lands allows Wildlife Services and federal agencies to abdicate their responsibilities and violate federal laws governing public lands management, including the Wilderness Act.

Section 2323.32 requires that WS-California “apply” Policies and Guidelines for Fish and Wildlife Management in Wilderness and Primitive Areas when making management recommendations to agencies “in a practical, reasonable, and uniform manner in all National Forest wilderness units... use the guidelines as a foundation for or as addendums to State or individual wilderness cooperative agreements.” This document is not referenced in the draft EIR/EIS. As part of vetting Minimum Requirements Decisions, federal agencies must determine if any proposed action taken is necessary to manage the area as wilderness. Indeed, WDM in Wilderness Areas is detrimental to wilderness character and wilderness because killing native wildlife does not work to meet wildlife conservation objectives.

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2323.33c - Predator Control

- Predatory mammals and birds play a critical role in maintaining the integrity of natural ecosystems. Consider the benefits of a predator species in the ecosystem before approving control actions. The Regional Forester may approve predator control programs on a case-by-case basis where control is necessary to protect federally listed threatened or endangered species, to protect public health and safety, or to prevent serious losses of domestic livestock. Focus control methods on offending individuals and under conditions that ensure minimum disturbance to the wilderness resource and visitors. Poison baits or cyanide guns are not acceptable. Poison bait collars may be approved.
- The U.S. Fish and Wildlife Service or approved State agencies shall carry out control programs. The Forest Service is responsible for determining the need for control, the methods to be used, and approving all proposed predator damage control programs in wilderness (FSM 2650). Only approve control projects when strong evidence exists that removing the offending individual(s) will not diminish the wilderness values of the area.

O4-15

Section 2323.33c above provides guidance on predator control in Wilderness Areas, stating that some WDM to “prevent serious losses of domestic livestock” is allowed. However, this guidance clearly states that WDM should focus on targeted actions directed at the individuals that caused the losses. WS-California should not be deploying lethal WDM if they are unable to target offending individuals. Further, indiscriminate methods also cause diminishment of the value of Wilderness Areas and disturb wildlife within these Wilderness Areas as well as disrupt human visitation, all which is in conflict with the above guidance.

WS-California must take into account the critical role that predatory mammals play in the health of wilderness ecosystems. As we explain throughout these comments, the science is clear

that killing native predators disrupts entire ecosystems, wildlife social dynamics, predator-prey relationships, hunting behavior and as a result harms wilderness character and influence. If the agency actually considered the best available science, it could only conclude that lethal control could not be within the scope of its activities in Wilderness Areas because it does not fit the purpose and need of this draft EIR/EIS. Disrupting natural processes harms human visitors, impoverishing their experience in Wilderness Areas.

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iv. Impacts to Bureau of Land Management Wilderness Areas

In 2012, the Bureau introduced Manual 6330, Management of Designated Wilderness Areas (BLM 2012b) (“Manual 6330”).¹⁸ The document provides guidance to the Bureau on managing lands designated by Congress as part of the National Wilderness Preservation System. Of particular relevance here is the Wilderness Act and Manual 6330’s restrictions on predator killing which provides: “Predator control activities must be directed at the specific offending animal or group of animals. Such activities should be carried out so as to minimize impacts to the wilderness characteristics of the WSA (including the natural interaction of native species).”

04-16

Shooting of animals from aircraft is only allowed where specifically authorized. To comply with governing law, all impacts from Wildlife Services’ activities must be compared to baseline levels of disturbance present in each Wilderness Area when it was designated, for all of the relevant resources the WSA was designated to protect. *See GYC v. Timchak*, No. CV-06-04-E-BLW, 2006 WL 3386731 (D. Idaho Nov. 21, 2006) (agency action authorizing heli-skiing in WSA violated Wilderness Act, NEPA, and NFMA because agency did not compare authorized levels to levels when WSA was designated). WS-California cannot proceed with WDM activities in Wilderness Areas without this analysis, otherwise it will be violating laws including, but not limited to, NEPA, NFMA, FLPMA, the Wilderness Act, and others.

v. No evaluation of site-specific impacts of WDM in Wilderness Areas

In our scoping comments we note that the draft EIR/EIS must include an analysis of the potential effects of predator control on individual designated Wilderness areas. 40 C.F.R. § 1508.27(b)(3). The draft EIR/EIS fails to analyze whether WDM in Wilderness areas is consistent with individual wilderness management mandates and fails to consider site-specific information about predator populations or other environmental conditions in individual Wilderness Areas. The draft EIR/EIS must consider how each WDM program alternative will affect individual designated Wilderness Areas in California.¹⁹

04-17

¹⁸ BLM Manual 6330—Management of BLM Wilderness Study Areas (2012). Available at: https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6330.pdf.

¹⁹ See footnote 14 for a list of all Wilderness areas in California.

b. Failure to properly consider and analyze effects on public safety (40 C.F.R. § 1508.27(b)(2))

The draft EIR/EIS fails to properly analyze the degree to which the proposed project will affect public health and safety, including proper analysis of the psychological impacts that lethal WDM can inflict on the public and their pets as they seek to enjoy California's Wilderness and Recreational Areas. *See* 40 C.F.R. § 1508.27(b)(2). As part of its proposed project, WS-California intends to deploy methods such as aerial gunning, trapping, and snaring. These lethal WDM can impact recreationists in several ways.

04-18

Wildlife Service's lethal practices impact recreationists who value carnivores and other species; virtually every time Wildlife Services kills wolves, coyotes, bears, foxes, or mountain lions, and other species, it devastates local recreationists who enjoy viewing, photographing, and watching these species in the wild. More broadly, Wildlife Service's reckless and indiscriminate methods, whether or not they are intended as lethal or non-lethal, can inflict trauma on recreationists who happen to stumble upon these activities, including witnessing aerial gunning or viewing a trapped animal.²⁰ Aerial gunning activities in particular can contribute to psychological harm to recreationists if they are forced to witness aircraft overhead carting dead carnivores.²¹ Witnessing the devastating consequences of Wildlife Service's activities can have a psychological impact on humans, including Post Traumatic Stress Disorder. In our scoping comments, we requested WS-California to evaluate the degradation of recreation caused by predator damage management overflights. Instead, the draft EIR/EIS dismissed the information provided in our scoping comments detailing the psychological harm caused by this WDM activity.

04-19

Psychological trauma to humans can also stem from the very real risk of losing one's beloved pet if the animal happens to stumble into an inherently indiscriminate trap set by Wildlife Services. A 2012 Sacramento Bee investigation²² into Wildlife Services' lethal practices documented one of many instances in which a family dog met her death at the hands of Wildlife Services. Maggie the dog had her spine crushed by a body-grip trap set near the family's suburban home. There is no justification for the lasting psychological damage caused by Wildlife Services' reckless killing methods. Maggie's death does not represent a single occurrence: the reports compiled by Sacramento Bee showed that an average of eight dogs a month were unintentionally killed by Wildlife Services between 2000-2012, but given Wildlife

04-20

²⁰ Roberts, Andrea L., et al. Race/ethnic differences in exposure to traumatic events, development of post-traumatic stress disorder, and treatment-seeking for post-traumatic stress disorder in the United States. *Psychological medicine* 41.1 (2011): 71.

²¹ Four wolves killed after recent cattle deaths in western Wyoming, *Casper Star Tribune* (August 26, 2020), available at https://trib.com/news/state-and-regional/four-wolves-killed-after-recent-cattle-deaths-in-western-wyoming/article_5a20f8f3-139e-5995-afd0-54fef8a423ac.html.

²² Tom Knudson, The Killing Agency: Wildlife Services' brutal methods leave a trail of animal death, *The Sacramento Bee* (April 12, 2012). Available at: <https://www.sacbee.com/news/investigations/wildlife-investigation/article2574599.html>.

Services documented history of not reporting unintentional kills, this number is almost certainly a gross underestimate.

↑ O4-20
Cont

c. The draft EIR/EIS does not contain a cost-benefit analysis in violation of NEPA

The draft EIR/EIS fails to include a cost-benefit analysis in violation of NEPA, stating it is not the purpose of the EIR/EIS to “debate the costs and benefits of specific wildlife damage management (WDM) activities or methods of WDM.”²³ Not only is it outrageous that a taxpayer funded program does not consider the benefit of those funds, it does not constitute a hard look and is unacceptable. The economic analysis must be present in the NEPA document. Agencies are required to ensure the professional integrity of all discussions and analyses in an environmental review, including economic analyses.²⁴ As the court stated in *Sierra Club v. Sigler*, 695 F.2d 957, 975-76 (5th Cir. 1983), “[t]here can be no hard look at costs and benefits unless all costs are disclosed.”

O4-21

d. The EIR/EIS Fails to Adequately Assess the Humaneness of Certain WDM Methods

The EIR/EIS fails to take a hard look at the humaneness of certain methods used by WS-California technicians to conduct WDM activities. The EIR/EIS states that the lethal methods used by WS-California technicians include shooting, neck snares, carbon dioxide, aerial operations, padded steel-jaw leghold traps, body-crushing traps, and gas cartridges, among other methods.²⁵ The EIR/EIS largely fails to directly evaluate the humaneness of these methods and lacks adequate consideration of much of the relevant scientific literature. Information about the humaneness of methods is essential for the public to be able to fully understand the impacts of the proposed action on both target and non-target wildlife. In particular, we are most concerned about the lack of a complete analysis on the humaneness of neck snares, padded steel-jaw leghold traps, body-crushing traps such as conibear, quick-kill, and snap traps, gas cartridges used in denning operations, and aerial gunning. These methods are particularly cruel and also pose a danger to people, companion animals, and non-target species, including threatened and endangered species. Below is a discussion of our concerns about these methods.

O4-22

i. Neck Snares

Neck snares are used by WS-California, yet this device is a particularly inhumane method of wildlife management. In 2022, WS-California killed 505 animals in neck snares, including

O4-23
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²³ Draft EIR/EIS at 3.2

²⁴ 40 C.F.R. §§ 1502.24, 1508.8 (the “effects” that a NEPA environmental review must evaluate include economic impacts).

²⁵ Appendix C at 1-14-19.

badgers, beavers, coyotes, raccoons, and skunks.²⁶ In prior years, WS-California has also killed red foxes, river otters, and cottontail rabbits using neck snares.²⁷ As all of these mortalities were categorized as “euthanized/killed,” it is unclear if the neck snares were used in kill sets or to restrain the target animals prior to euthanasia, nor is it known if the neck snares used by WS-California are manual or mechanical neck snares. The final EIR/EIS must provide clarity on these points.

Regardless of the intention of the snare set (i.e., killing or restraining) or the type of snare in use, the cruelty associated with neck snares is extreme. In kill sets, the snare continues to tighten as the animal struggles until strangulation occurs. In sets intended to restrain the snared animal, the captured animal is held by his or her neck until the trapper arrives to kill the animal, unless the animal has already died due to the extent of his or her injuries and/or struggles, or from predation, extreme weather, or dehydration or starvation.

WS-California uses neck snares primarily to capture coyotes,²⁸ which is a method of particular humane concern for canids. In their analysis of manual and powered neck snares for use in trapping canid species in Canada, Proulx et al. (2015) documented significant welfare concerns associated with the use of neck snares.²⁹ They found that manual and powered killing neck snares did not consistently and quickly render canids unconscious, were non-selective, and did not routinely capture animals by the neck. Proulx et al. also found the following:

1. Laboratory researchers failed to achieve exact and ideal positioning of neck snares behind the jaw of the target animal suggesting that, in the field, such exact placement would be far more difficult; for manual killing neck snares, one study of 65 snared coyotes found that 59 percent were captured by the neck, 20 percent by the flank, and 10 percent by the foot, and nearly half of the animals were still alive the morning after being snared;
2. In another study of various manual killing neck snares, between 5 and 32 percent of the snared animals were still alive when found 12 or more hours after capture;
3. The amount of disturbance at a capture site is not indicative of time to death of the captured animal as “captured animals may remain conscious but physically inactive due to distress, shock, injury or pain;”

²⁶ USDA-APHIS, Program Data Report G-2022, Filtered by State: California (2022). Available at:

https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX

²⁷ See, e.g., USDA-APHIS, Program Data Report G-2019, Filtered by State: California (2019). Available at:

https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2019:INDEX

²⁸ USDA-APHIS, Program Data Report G-2022, Filtered by State: California (2022). Available at:

https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX

²⁹ Proulx, G., Rodtka, D., Barrett, M.W., Cattet, M., Dekkers, D., Moffatt, E., and Powell, R. 2015. Humaneness and Selectivity of Killing Neck Snares Used to Capture Canids in Canada: A Review. *Canadian Wildlife Biology and Management*, 4(1): 55-65.

O4-23
Cont.

O4-24

4. In a thorough evaluation of power killing neck snares, three models rendered 4 of 5 anesthetized red foxes irreversibly unconscious within 10 minutes but when used on non-anaesthetized animals in a semi-natural environment it was difficult to capture foxes behind the jaw with the snares and to cause irreversible loss of consciousness within 300 seconds.³⁰

04-24
Cont.

Proulx et al. noted it is not the placement or operation of the neck snares that can result in suffering, but rather that the anatomy and physiology of canids can exacerbate the suffering associated with the use of neck snares. As reported by Proulx et al., laboratory tests with dogs show that canids have the ability to continue to circulate blood to the brain after bilateral ligation of the common carotid arteries because of the ability of other arteries (e.g., vertebral arteries) situated more deeply within the neck to compensate. Collateral circulation also occurs within the venous blood flow from the brain such that drainage can continue if the internal jugular veins are occluded. Because of collateral blood circulation, it is difficult, if not impossible, to stop blood flow to and from the brain by tightening a snare on the neck.

04-25

More recently, in his book *Intolerable Cruelty: The Truth Behind Killing Neck Snares and Strychnine*,³¹ Dr. Proulx reports that when a canid is snared, the thick musculature around the animal's neck allows the carotid artery to continue to supply blood to the brain, but the jugular vein is constricted, cutting off blood back down to the heart. A telltale sign is the grotesquely swollen heads of the snare's victims (which trappers refer to as "jellyheads"). Canids caught in neck snares take hours, if not days, to die.

04-26

Furthermore, the non-selectivity of neck snares for target and non-target mammal and bird species was clearly reflected in data presented in Table 1 in Proulx et al. (2015):

Species Common Name	Number of Cases		
	Injured by Snare	Killed by Snare	Total Snared
Coyote	2	0	2
Gray wolf	4	0	4
Red fox	1	0	1
American black bear	1	0	1
Bobcat	0	1	1

04-27

³⁰ *Id.* See also Guthery, F. S., and S. L. Beasom. 1978. Effectiveness and selectivity of neck snares in predator control. *Journal of Wildlife Management* 42: 457-459, Phillips, R. L. 1996. Evaluation of 3 types of snares for capturing coyotes. *Wildlife Society Bulletin* 24: 107-110, Proulx, G., and M. W. Barrett. 1994. Ethical considerations in the selection of traps to harvest martens and fishers. Pages 192-196 in S. W. Buskirk, A. S. Harestad, M. G. Raphael, and R. A. Powell, editors, *Martens, sables, and fishers: biology and conservation*. Cornell University Press, Ithaca, New York, USA.

³¹ Proulx, G. 2018. *Intolerable Cruelty: The Truth Behind Killing Neck Snares and Strychnine*. Alpha Wildlife Research and Management Limited.

Canada lynx	0	8	8
Fisher	0	2	2
Mountain lion	0	4	4
Snowshoe hare	0	1	1
White-tailed deer	0	4	4
Wolverine	0	1	1
Bald eagle	4	75	79
Barred owl	0	2	2
Common raven	0	2	2
Golden eagle	2	25	27
Goshawk	0	3	3
Great horned owl	2	2	4
Red-tailed hawk	1	10	11
Rough-legged hawk	0	7	7
Total specimens	17	147	164

O4-27
Cont.

The issues raised in these studies must be adequately addressed in the final EIR/EIS to fulfill the mandates of NEPA.

ii. Padded Steel-Jaw Leghold Traps

Another method of concern is padded steel-jaw leghold traps, which WS-California uses on a limited basis to trap coyotes, free ranging cats, foxes, opossums, skunks, and ravens.³² The California Fish and Game Code states: “It is unlawful for any person, including an employee of the federal, state, county, or municipal government, to use or authorize the use of any steel-jaw leghold trap, padded or otherwise, to capture any game mammal, fur bearing mammal, nongame mammal, or protected mammal, or any dog or cat. The prohibition in this subdivision does not apply to federal, state, county, or municipal government employees or their duly authorized agents in the extraordinary case where the otherwise prohibited padded-jaw leghold trap is the only method available to protect human health or safety.”³³ The draft EIR/EIS should identify what circumstances qualify as an “extraordinary case” that justifies the use of this otherwise banned method.

O4-28

The draft EIR/EIS states that WS-California technicians will continue to use padded steel-jaw leghold traps.³⁴ To circumvent California state law, WS-California relies on *Nat. Audubon Society v. Davis*, 144 F. Supp. 2d 1160 (N.D. Cal. 2000), which the draft EIR/EIS states stands

O4-29

³² USDA-APHIS, Program Data Report G-2022, Filtered by State: California (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX

³³ CA Fish and Game Code, section 3003.1(a)(3).

³⁴ Appendix C at 1-16-17.

for the proposition that section 3003.1(a)(3) “did not apply to federal agencies engaged in wildlife management on federal lands or in conservation efforts under federal law, including the protection of T&E species[.]”³⁵ Yet the draft EIR/EIS provides minimal information to the public that it is actually confining its use of padded steel-jaw leghold traps to these instances. Thus, the public has not been provided with the information it needs to fully understand the extent of WS-California’s operations in this regard. Moreover, the inhumaneness of this method was not carefully evaluated in the draft EIR/EIS in terms of injuries sustained, suffering and potential mortality due to predation or exposure, as well as the risk of non-target capture. These shortcomings must be remedied in the final EIR/EIS.

04-29
Cont.

Steel-jaw leghold traps—whether (so-called) padded, off-set, long-spring, coil-spring, dog-proof, or any other variety—are inhumane in terms of pain, distress, and physical injuries as a result of being caught in these devices, as well as potential mortality. Fundamentally, despite the wide range of device modifications that may be employed, no steel-jaw trap has been created that is able to reduce animal suffering to an acceptable level. The jaws of a leghold trap must slam together with sufficient force to catch the animal’s limb, and they must clamp together with enough force to prevent an animal from pulling free. It is this basic operating principle that makes such traps brutal regardless of the modifications.

04-30

Some animals may suffer for an extended time in these traps until they are killed by the trapper (or are drowned). Animals may be miscaught, enduring additional trauma. Many trapped animals will violently fight the trap after being caught, often biting at the device, which results in broken teeth and gum damage in addition to the damage to the captured limb, including lacerations, strained and torn tendons and ligaments, extreme swelling, and broken bones.³⁶ Some trapped animals are known to chew off their own trapped limb to escape on three legs. Constriction of a limb in a trap can greatly reduce or completely cut off blood supply to the affected appendage, which can cause the appendage to slough off due to gangrene and oftentimes require amputation of the limb in non-target animals. In winter conditions, the portion of the animals’ toes or foot that are below the jaws can freeze. For these reasons, steel-jaw leghold traps have been condemned as inhumane by the World Veterinary Association, the American Veterinary Medical Association, the National Animal Control Association of the United States, and the American Animal Hospital Association.³⁷

04-31

³⁵ Appendix C at 2-16.

³⁶ See Iossa, G., Soulsbury, C.D., and Harris, S. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare* 2007, 16: 335-352.

³⁷ See, e.g., *Leghold Traps*, AM. ANIMAL HOSPITAL ASS’N (Nov. 2014). Available at: <https://www.aaha.org/about-aaha/aaha-position-statements/leghold-traps/> (“The American Animal Hospital Association opposes the use of steel-jaw leghold traps on the grounds that their use is cruel and inhumane.”); *AVMA positions address animal welfare concerns*, AM. VETERINARY MED. ASS’N (July 1, 2001). Available at <https://www.avma.org/javma-news/2001-07-15/avma-positions-address-animal-welfare-concerns> (“The AVMA considers the steel-jaw leghold trap to be inhumane”).

Iossa et al. (2007) provided an extensive review of the injury rates associated with multiple trap types, including padded, off-set, enclosed, and unpadded leghold traps.³⁸ While the percentage of no injuries for some foothold traps for select species were in excess of 50 percent, foothold traps resulted in minor injuries more than 50 percent of the time in the majority of studies reviewed, ranging from 8 percent minor injuries for Canada lynx captured in a padded foothold trap to 100 percent for a bobcat captured in a leg hold snare. For major injuries, the percentage of injuries ranged from 4 percent for red foxes captured in a padded leghold trap to 74 percent for raccoons captured in an unpadded foothold trap.³⁹

O4-32

The types of injuries assessed in evaluating the “humaneness” of traps include: (1) mild trauma, such as claw loss, edematous swelling or hemorrhage, minor cutaneous laceration, minor subcutaneous soft tissue maceration or erosion, major cutaneous laceration, except on footpads or tongue, and minor periosteal abrasion; (2) moderate trauma, such as severance of minor tendon or ligament, amputation of 1 digit, permanent tooth fracture exposing pulp cavity, major subcutaneous soft tissue laceration or erosion, major laceration on footpads or tongues, severe joint hemorrhage, joint luxation at or below the carpus or tarsus, major periosteal abrasion, simple rib fracture, eye lacerations, and minor skeletal degeneration; (3) moderately severe trauma, including simple fracture at or below the carpus or tarsus, compression fracture, comminuted rib fracture, amputation of two digits, major skeletal degeneration, and limb ischemia; and (4) severe trauma, including amputation of three or more digits, any fracture or joint luxation on limb above the carpus or tarsus, any amputation above the digits, spinal cord injury, severe internal organ damage (internal bleeding), compound or comminuted fracture at or below the carpus or tarsus; severance of a major tendon or ligament, compound or rib fractures, ocular injury resulting in blindness of an eye, myocardial degeneration, and death.⁴⁰

O4-33

Such injuries, particularly those included in the moderate trauma, moderately severe trauma, and the severe trauma categories, should not be considered acceptable or humane. In addition to identifiable injuries caused by the trap, when evaluating the impact of mammal damage management on target and non-target species it is critical to consider the potential for indirect mortality as a result of capture in a leghold trap, or any restraining device. Intentional live capture and release of targeted species as well as unintentional capture and release of non-target species, can be harmful to the animal. Even if the animal is released with no apparent injuries or injuries deemed to be minor, the animal may still be suffering adverse side effects from restraint (including from restriction of blood flow or extended exposure to the elements), causing pain, suffering, and even death, hours, days, or weeks after capture.

O4-34

³⁸ Iossa, G., Soulsbury, C.D., and Harris, S. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare* 2007, 16: 335-352.

³⁹ *Id.*

⁴⁰ *Id.*

This was demonstrated by Andreasen et al. (2018) in a study that examined cause-specific mortality in mountain lions unintentionally caught in leghold traps set for bobcats from 2009 through 2015 in their study site in Nevada.⁴¹ The authors found that if female mountain lions were captured in leghold traps, it directly reduced their survival by causing injuries that made the animals more susceptible to other forms of mortality. Of the forty-eight lions originally included in the study, thirty-three died during its seven-year duration. Of the thirty-three lions, seven died as a consequence of non-target trapping (five were caught in leghold traps and two in snares). Of the seven that died due to non-target trapping, five (four adult females and one juvenile) had been captured in leghold traps one or more times, and the other two had been captured in snares. Most of the injuries recorded ranged from no visible damage or slight edema, to more severe lacerations or broken toes. Of the four adult females, two died as a result of trap related injuries several weeks after capture, another died from starvation and was missing two digits on her front right paw, and the fourth died three weeks after she escaped from a trap. The fourth mortality was discovered as a result of a lion paw being found in a trap, suggesting the animal may have self-amputated the paw to escape from the trap.

O4-35

Despite the literature on this subject, the draft EIR/EIS provides only cursory statements about animals who are unintentionally caught and released, and undergoes no analysis of the welfare implications of capture and release. The document simply states: “non-target individuals inadvertently captured are typically released unharmed.”⁴² This statement is insufficient to comply with NEPA’s requirements. The document provides no discussion of how technicians evaluate whether an animal is “unharmed,” what aid technicians render when an animal is “harmed,” and whether any follow-up assessments are conducted on released animals to determine harm that may not be apparent upon release. These issues, as well as the literature on this subject, must be evaluated in the final EIR/EIS.

O4-36

Another type of leghold trap is the enclosed leghold trap (dog proof trap), which is generally used for trapping raccoons and opossums and is included as an Association of Fish and Wildlife Agencies’ Best Management Practices (“BMP”) trap for both species. Notably, such traps are particularly inhumane for raccoons, who experience excruciating pain when one of their front feet is caught due to the hyper-sensitivity of those limbs. While such traps, given their design, are intended to reduce bycatch of non-target species, feral cats and any species with a small paw able to reach into the trap and pull up could be captured in such traps. Even a human, including a young child, could be caught in such traps. Despite reducing the potential for non-target captures, enclosed leghold traps can result in injuries, amputations, and mortality.

O4-37

⁴¹ Andreasen, M. et al., Survival of Cougars Caught in Non-Target Foothold Traps and Snares, 82(5) J. WILDLIFE MGMT. 906 (2018).

⁴² EIR/EIS at 4.2.5-3.

Hubert et al. (1996) evaluated the injury rates associated with the EGG trap (one type of enclosed leghold trap) for capturing raccoons.⁴³ They used a scoring system that assigned points to different types of documented injuries with the higher scores reserved for the more severe injuries.⁴⁴ A score greater than 50 is considered serious damage while scores greater than 125 are reflective of severe damage. Of the 62 raccoons studied by Hubert et al., 23 experienced injury scores associated with the EGG trap of 50 or higher with 9 experiencing injury scores of 125 or greater. Of 62 raccoons captured in the EGG trap, there were 125 instances (affecting 82.3 percent of captured raccoons) of edematous swelling and/or hemorrhage, 47 (37 percent) cutaneous lacerations greater than or equal to 2 centimeters, and 19 (22.6 percent) instances of damage to the periosteum.

O4-38

The draft EIR/EIS states that WS-California uses traps identified as “humane” through the Association of Fish and Wildlife Agencies’ Best Management Practices (“BMP”) testing process for all restraining, killing, and foothold traps used in its mammal damage management operations, when it is feasible to do so.⁴⁵ The undersigned organizations question the veracity of AFWA’s testing program, particularly because it relies on trappers for trap testing purposes and reporting on injury types and rates, and non-target captures, as well as because the actual injury/mortality data is not disclosed in the trap-specific BMP reports. Since the species-specific BMP trap reports do not contain the actual injury/mortality scoring information for each trap, WS-California should obtain and disclose that data so that the public can compare the “humaneness” of each species-specific BMP trap type. Such disclosure is necessary so that WAS-California’s claims of using BMP traps can be verified and to permit the public to provide substantive and informed comments as to whether such traps should be used given welfare concerns. Similarly, since BMP reports do not disclose the number, species, and type of injury sustained by non-target animals trapped during BMP testing or cite to the relevant species-specific trapping literature, WS-California must disclose that information so the public is aware of non-target take data and the scientific, peer-reviewed literature, if any, that substantiates the findings in BMP trap reports.

O4-39

Currently there are 22 species-specific BMP reports.⁴⁶ Each report contains information about several recommended BMP traps that have been evaluated as “humane” including information about any trap accessories (e.g., swivels, springs, anchors) and trap set requirements used to achieve the “humane” rating. The draft EIS/EIR does not, however, adequately disclose which BMP traps, trap accessories, and trap set requirements it uses for each species that it traps for mammal damage management. Regarding trap accessories, that disclosure should include

O4-40

⁴³ Hubert, G.F., et al., Evaluation of Two Restraining Traps to Capture Raccoons, 24(4) WILDLIFE SOC’Y BULL. 699 (1996).

⁴⁴ *Id.* at 702.

⁴⁵ EIR/EIS at 4.2.5-3.

⁴⁶ All BMP species-specific trap reports are available at: <https://www.fishwildlife.org/afwa-inspires/furbearer-management>. The 22 reports include separate reports for eastern and western coyotes and for gray, red, and Arctic fox.

information on the use of additional springs (“beefier kits”), swivels, and the type of anchors used. For padded traps, the EIR/EIS should disclose how frequently rubber strips commonly damaged by trapped animals are replaced with new ones. Information on the maintenance routine for traps and snares used by Wildlife Services technicians should be provided as trapping devices that are not working properly due to age, rust, non-working parts, and lack of care are likely to be even more cruel than fully functioning devices. These issues must be addressed in the final EIR/EIS.

O4-40
Cont.

When WS-California uses traps in its operations, the agency should adhere to California’s trap check times, which is set at 24 hours, and trap monitors should be employed. Wildlife Services’ National Wildlife Research Center (NWRC) has found that trap monitors save driving or hiking time, decrease fuel usage and reduce driving time over rough terrain, save Wildlife Services and its customers money, and prioritize checks of particular traps.⁴⁷ These devices can and should be used in circumstances where they are reliable and Wildlife Services, in collaboration with NWRC and trap monitor device manufacturers, should be pioneering efforts to improve the design, functionality, and efficiency of these devices by continually testing them under field conditions.

O4-41

From a humane perspective, the use of monitoring devices is very important because they can greatly decrease the amount of time a captured animal is restrained, minimizing pain, stress, and injury, and allowing non-target animals to be released in a timely manner to increase the likelihood of post-release survival.⁴⁸ Animals caught in these traps can suffer from a condition called capture myopathy which occurs when an animal overexerts itself from struggling in a trap, and can lead to sudden death.⁴⁹ Symptoms of capture myopathy can develop within hours of capture. The benefits of trap check monitors were demonstrated by Will et al. (2010) in their study of the use of a telemetry-based trap monitoring system on San Nicolas Island off the coast

⁴⁷ U.S. Department of Agriculture, Animal and Plant Health Inspection Service, National Wildlife Research Center. 2007. Evaluation of Remote Trap Monitors. Available at: https://www.aphis.usda.gov/wildlife_damage/nwrc/publications/Tech_Notes/TN_%20Remote%20Trap%20Monitors.pdf.

O4-42

⁴⁸ See Donald M. Broom, Some Thoughts on the Impact of Trapping on Mammal Welfare With Emphasis on Snares, in MAMMAL TRAPPING: WILDLIFE MANAGEMENT, ANIMAL WELFARE & INTERNATIONAL STANDARDS 121 (Gilbert Proulx ed., 2022) (“Animals left in snares are susceptible to thirst, hunger, further injury and attack by predators, especially if in the trap for many hours or days.”); Irene Rochlitz, *The Impact of Snares on Animal Welfare*, in ONEKIND REPORT ON SNARING (2010) (“Snares can cause severe injuries, pain, suffering, and death in trapped animals” and leaving animals in snares for hours or days “expos[es] them to the elements, to thirst, hunger, further injury and attack by predators.”); Gilbert Proulx & Dwight Rodika, *Killing Traps and Snares in North America: The Need for Stricter Checking Time Periods*, 9(8) ANIMALS 570 (2019).

⁴⁹ Breed, D., Conserving wildlife in a changing world: Understanding capture myopathy-a malignant outcome of stress during capture and translocation. 7(1) CONSERV PHYSIOL. (2019). DOI: 10.1093/conphys/coz027https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6612673/

of California during a project to eradicate the island's feral cat population.⁵⁰ Given the size of the island and the presence of fewer than 600 island foxes, the trap monitoring system was essential to "remotely check trap status, decrease staff time spent checking traps, and decrease response time to captured animals to limit fox injuries and mortalities due to exposure."⁵¹ The system allowed a field team of six people to conduct daily checks of nearly 250 traps with a response time of less than 60 minutes during daylight hours. Specifically, Will et al. reported:

The average daytime response time for capture events was 43 minutes \pm 31 minutes (n = 162), while the average overall response time was 5 hours \pm 4 hours (n = 853). Foxes that were caught after working hours spent an average of 6 hours \pm 3 hours (n = 691) in traps. While 4 foxes were in a trap for an unknown amount of time because of monitor failures, no animal was in a trap for more than 14 hours with a working monitor. There were 1,012 total non-target capture events with 74 injuries, for an injury rate of 7%. There were 9 monitor failures with 4 leading to injury or casualty.⁵²

In another experiment where Global System for Mobile communication trap alarms were used when capturing otter, Néill et al. (2007) found that functioning alarms permitted trapped otters to be removed within 22 minutes of capture and reduced the injuries suffered by the animals from an average, cumulative score of 77.7 to only 5.5 on the trap trauma scale developed by the International Organization for Standardization, ISO 10990-5.⁵³ This information must be evaluated in the final EIR/EIS.

iii. Body-Crushing Traps

The EIS/EIR also fails to consider the humaneness of Conibear and other body-crushing traps, which WS-California uses to kill approximately 600 animals per year, including beavers, muskrats, opossums, pocket gophers, rabbits, raccoons, ground squirrels, and skunks.⁵⁴ To satisfy NEPA's requirements, WS-California must disclose the specific types of body-gripping traps it uses and provide information about those traps, including the intended strike location, strike momentum, clamping force, expected percentage of accurate strikes (with data to support this), time to death, time to unconsciousness, injury/wounding scores, and non-target species capture rates, as well as an analysis of the welfare implications of the traps in use and the impacts on non-target species.

⁵⁰ Will, D., Hanson, C.C., Campbell, K.J., Garcelon, D.K., and Keitt, B.S. 2010. A Trap Monitoring System to Enhance Efficiency of Feral Cat Eradication and Minimize Adverse Effects on Non-Target Endemic Species on San Nicolas Island. Proceedings 24th Vertebrate Pest Conference (R. M. Timm and K. A. Fagerstone, Eds.), Pp. 79-85.

⁵¹ *Id.*

⁵² *Id.*

⁵³ Néill, L.O., de Jongh, A., Ozolin, J., de Jong, T., and Rochford, J. 2007. Minimizing Leg-Hold Trapping Trauma for Otters With Mobile Phone Technology. Journal of Wildlife Management, 71(8):2776-2780.

⁵⁴ See, e.g., USDA-APHIS, Program Data Report G-2022, Filtered by State: California (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX

O4-42
Cont.

O4-43

O4-44

According to Iossa et al. (2007),⁵⁵ for a kill trap to satisfy humaneness criteria in North America, 70 percent of animals must be rendered unconscious within 70 seconds for stoats, 120 seconds for marten, lynx, and fisher, and 180 seconds for all other species. As noted in Table 1 (see below) in Iossa et al. (2007), the majority of killing traps tested, including a variety of different models of Conibear traps, failed to satisfy the loss of consciousness standard for humaneness.

O4-45

⁵⁵ See Iossa, G., Soulsbury, C.D., and Harris, S. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare* 2007, 16: 335-352.

Table 1 Accepted standards of animal welfare for killing traps.

Species	Trap model	Mis-strike	Time limits to unconsciousness			Reference	
			Current technology	n	Criterion Pass Fail		
<i>Canis latrans</i>	King necksnare ¹	-	> 180 s	-	180 s	-	Garrett 1999; Proulx 1999a
	Moshier necksnare ¹	-	> 180 s	-	180 s	x	
<i>Canis lupus</i> ⁶	-	-	-	-	180 s	-	-
<i>Castor canadensis</i> ⁶	Conibear 330™	-	> 180 s	6	180 s	x	Novak 1981a
	Modified Conibear 330™	-	< 180 s	6	180 s	x	
<i>Lontra canadensis</i>	-	-	-	-	180 s	-	-
<i>Lynx rufus</i>	-	-	-	-	180 s	-	-
<i>Lynx canadensis</i>	Conibear 330™	1	> 180 s	9	180 s	x	Proulx et al 1995
	Modified Conibear 330™	1	67.2 ± 4.0 s	9	180 s	x	
<i>Martes americana</i>	Conibear 120™	3	> 180 s	6	120 s	x	Barrett et al 1989; Proulx et al 1999a,b
	Conibear 120 Magnum™	2	68 ± 8.2 s	14	120 s	x	
	Conibear 160™	3	> 180 s	16	120 s	x	
	Sauvageau 2001-5™	-	> 180 s	14	120 s	x	
<i>Martes pennanti</i>	Bionic ²	0	< 55 s	9	180 s	x	Proulx & Barrett 1993a,b; Proulx 1999b
	Conibear 220™	-	> 180 s	4	180 s	x	
	Modified Conibear 220™	0	> 180 s	4	180 s	x	
<i>Ondatra zibethicus</i> ⁶	Leprich spring trap	0	31.5 ± 16.3 s	12	180 s	x	Inglis et al 2001
	Conibear 110™	3	184.0 ± 31.7 s ¹	12	180 s	x	
<i>Procyon lotor</i> ⁶	Conibear 160™	-	> 180 s	5	180 s	x	Novak 1981a; Proulx & Drescher 1994; Sabenn & Mills 1994
	Conibear 280™	0	> 180 s	6	180 s	x	
	Conibear 330™	5	> 180 s	5	180 s	x	
	Sauvageau 2001-8™	0	> 180 s	3	180 s	x	
<i>Taxidea taxus</i>	-	-	-	-	180 s	-	-
<i>Castor fiber</i>	-	-	-	-	180 s	-	-
<i>Lutra lutra</i>	-	-	-	-	180 s	-	-
<i>Lynx lynx</i>	-	-	-	-	180 s	-	-
<i>Martes martes</i>	-	-	-	-	120 s	-	-
<i>Martes zibellina</i>	-	-	-	-	120 s	-	-
<i>Meles meles</i>	-	-	-	-	180 s	-	-
<i>Mustela erminea</i> ⁶	Fenn Mk IV	-	> 180 s	-	60 s	x	Warburton et al 2002; Poutu & Warburton 2003; Warburton & O'Connor 2004
	Fenn Mk VI	-	> 180 s	-	60 s	x	
	Victor Snapback ³	1	37.3 ± 5.0 s	7	60 s	x	
	Waddington backcracker	4	113 s	8	60 s	x	
<i>Nyctereutes procyonoides</i>	-	-	-	-	180 s	-	-

Mis-strike refers to the number of animals struck in a non-target body part; time limits to unconsciousness refer to loss of corneal and palpebral reflexes; n is the number of animals tested.

Most of the tests were conducted in North America under the criteria that ≥ 70% of animals should be unconscious in ≤ 60, 120 or 180 seconds (eg Proulx 1999a; review in Powell & Proulx 2003). This is therefore used to assess passes and failures. The line divides North American from European species.

⁶ Species found in both continents; ¹ the trap failed because of high number of mis-strikes; ² not tested in the field; in a different experiment 2/10 animals escaped and 1/10 mis-strike; ³ time to loss of heartbeat; ⁴ see main text for stoat; ⁵ the trap failed because of high number of escapes.

The failure of kill traps to meet established welfare standards has been documented by other researchers. Proulx and Barrett (1988)⁵⁶ rejected the commercially available Conibear 120 as an effective trap to kill marten since it failed to render greater than/equal to 5/6 unanesthetized marten struck in the head/neck region irreversibly unconscious within three minutes (based on

⁵⁶ Proulx, G., and Barrett, M.W. On the Development and Implications of the Conibear 120 Magnum Trap to Harvest Marten and Mink, PROCS. NE. FUR RES. TECH. COMM. WORKSHOP 193 (1988).

Canada's General Standards Board (CGSB) performance criteria). Linscombe (1976),⁵⁷ when comparing the killing efficiency of the Victor No. 2 leghold and Conibear 220 traps, determined, as expected, that more trapped animals were found alive in the leghold trap but that the Conibear 220 trap does not consistently kill trapped animals with 9.7 percent of adult nutria and 10.7 percent of immature nutria found alive in the traps. For fisher, Proulx and Barrett (1993)⁵⁸ "determined that the Conibear 220 trap, despite being mechanically improved compared to the standard Conibear trap, did not consistently render the species irreversibly unconscious in ≤ 5 minutes, thereby failing to satisfy the three-minute standard." Proulx et al. (1995)⁵⁹ found that the Conibear 330 trap failed to consistently render trapped lynx irreversibly unconscious within three minutes for one animal struck in the shoulder and two of eight animals struck in the neck. This trap, when modified by adding two clamping bars, did satisfy the standard. Proulx (1999)⁶⁰ determined that the Conibear 120, 160, 220, 280, and 330 traps did not consistently satisfy the three-minute standards for irreversible unconsciousness for multiple species while modified versions of some of these traps (e.g., Conibear 120 Magnum with pitchfork trigger, Conibear 120 Magnum with pan trigger, Conibear 330 with clamping bars) did satisfy the standard. In their assessment of the welfare implications and ethics of multiple trap types, including kill traps, Powell and Proulx (2003)⁶¹ found that, absent modification, no standard or commercially available Conibear traps, or other types of killing traps, consistently killed animals within three minutes.

Proulx and Rodtka (2019)⁶² determined, in their review of the relevant literature, that Conibear traps used for marten and mink failed to satisfy either the CGSB criteria or the Agreement on International Humane Trapping Standards (AIHTS) criteria (e.g., for martens the animals must be rendered unconscious and insensible within two minutes). For the standard, commercially available Conibear 120 trap, which is not certified as humane under Canadian standards⁶³ but is considered acceptable under the BMP trapping criteria, they determined that:

Mechanical evaluations showed that the Conibear 120 trap does not have the potential to render animals unconscious in ≤ 3 min [15] and thus to meet AIHTS' 2-min time limit. This was further

⁵⁷ Linscombe, G. 1976. An evaluation of the No. 2 Victor and 220 Conibear traps in coastal Louisiana. Louisiana Wildlife and Fisheries Commission.

⁵⁸ Proulx, G., and Barrett, M.W. 1993. Evaluation of mechanically improved Conibear 220™ traps to quickly kill fisher (*Martes pennanti*) in simulated natural environments. *Journal of Wildlife Diseases*, 29(2), 1993, pp. 317-323.

⁵⁹ Proulx, G., Kolenosky, A.J., Cole, P.J., and Drescher, R.K. 1995. A humane killing trap for lynx (*Felis lynx*): the Conibear 330™ with clamping bars. *Journal of Wildlife Diseases*, 31(1), 1995, pp. 57-61.

⁶⁰ Proulx, G. 1999. Review of current mammal trap technology in North America. Chapter 1 in Proulx, G. (editor) *Mammal Trapping*.

⁶¹ Powell, R.A. and Proulx, G. 2003. Trapping and Marking Terrestrial Mammals for Research: Integrating Ethics, Performance Criteria, Techniques, and Common Sense. *ILAR Journal*, Vol. 44 (4): 259-276.

⁶² Proulx, G., and Rodtka, D. 2019. Killing traps and snares in North America: the need for stricter checking time periods. *Animals*, 9, 570; doi:10.3390/ani9080570.

⁶³ As noted by Proulx & Rodtka, mechanically improved Conibear 120 trap models have now been developed and have been certified as humane by the Fur Institute of Canada. *Id.*

O4-47
Cont.

O4-48

demonstrated in tests with wild animals in simulated natural environments where 2 out of 6 tested animals did not lose consciousness within 5 min (the time limit was 3 min but the research protocol allowed researchers to prolong it to 5 min to learn more about traps). This result suggests that, based on the normal approximation to the binomial distribution (one-tailed), the Conibear 120 trap would then be expected to humanely kill (by rendering animals unconscious in ≤ 3 min as per CGSB), with 95% confidence, $>20\%$ of all captured martens of a true population. The poor performance of the Conibear 120 trap to humanely kill martens was further determined on working traplines. At least 4 out of 13 martens captured in Conibear 120 traps were struck in non-lethal regions that would not result in a loss of consciousness in ≤ 3 min. Thus, on the basis of a one-tailed binomial test, the trap would, with 95% confidence, render $<40\%$ of captured martens unconscious in ≤ 3 min.⁶⁴

O4-48
Cont.

For mink, which have greater cervical musculature and stronger bones compared to the American marten, Proulx and Rodtka reported that:

Mink ... cannot be humanely killed, i.e., lose consciousness in ≤ 3 min as per CGSB, by the Conibear 120 trap. In fact, even the mechanically superior and stronger C120 Magnum failed to humanely kill mink captured by the neck. Furthermore, while the Conibear 120 trap is marketed with a two-prong trigger, its inability to properly strike mink in vital regions was reported nearly 50 years ago. The stronger C120 Magnum trap equipped with a pan trigger humanely killed mink double-struck in the neck and thorax. Because the two-prong trigger fails to ensure strikes in vital regions, and the Conibear 120 trap does not have the striking and clamping forces to produce a humane kill, many mink captured in this trap stay alive for many hours, and sometimes until the following day. Thousands of mink are trapped every year in North America, and many of those captured in the Conibear 120 trap must experience pain and suffering for periods of time exceeding AIHTs' time limit of 5 min.⁶⁵

O4-49

Warburton (1982) examined two kill traps from New Zealand (the Banya and Kaki traps) and two from North America (the Conibear and Bigelow traps).⁶⁶ The two North American traps proved to be the least humane as several common brushtail possums caught by the neck remained alive while others were trapped across the chest, abdomen, or rump. In another study

O4-50

⁶⁴ *Id.* (citations omitted).

⁶⁵ *Id.* (citations omitted).

⁶⁶ Warburton, B. Evaluation of Seven Trap Models as Humane and Catch-efficient Possum Traps, 9(3) N.Z. J. ZOOLOGY 409 (1982).

from New Zealand, Warburton and Hall (1995)⁶⁷ assessed the impact momentum and clamping force of kill traps. Based on their preliminary tests, they found that:

[m]ost kill-traps available in New Zealand generate an impact momentum of about 1 kg.m.s⁻¹, much lower than the impact threshold of about 7 kg.m.s⁻¹ required to kill a possum when no clamping force is added. It appears unlikely, therefore, that new traps based solely on impact to achieve a humane kill can be developed if the strike location and direction of impact are the same as those used by the simulator.

Furthermore, when the possums struck across the neck were examined, it was determined that death was caused by suffocation and/or cerebral anoxia due to the compression of the trachea and jugular veins. Physical trauma in the form of vertebral or cranial fractures was only found when the impact momentum exceeded c. 5-6 kg.m.s⁻¹. Additionally, Warburton and Orchard (1996) determined that the Conibear 160 trap and the BMI 160 trap failed to satisfy humane criteria for traps contained in the draft standards from the International Organization for Standardization because the Conibear 160 trap did not kill enough possums during pen trials, and the BMI 160 trap failed to achieve a sufficiently high number of correct strikes during field trials.⁶⁸

The location where the trap strikes the animal is critical in determining how quickly the trapped animal dies and, in the field, animals do not consistently enter the trap in ways that assure a rapid loss of consciousness.⁶⁹ Several studies have found misstrikes ranging from eight to fifteen percent.⁷⁰ Warburton (2000) found that possums trapped in the field were often found with their necks rotated in the trap and/or with a forelimb caught between the striking bar and the neck reducing the efficiency of the killing traps.⁷¹ When the neck is rotated, he determined that it is unlikely that both carotid arteries would be totally occluded, preventing rapid, irreversible unconsciousness. Therefore, for a kill trap to operate effectively, the animal “must, as much as possible, be vertically aligned with no limbs obstructing the striking bar” – a circumstance that is difficult to consistently achieve in the wild.⁷²

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⁶⁷ Warburton, B. and J.V. Hall, Impact Momentum and Clamping Force Thresholds for Developing Standards for Possum Kill Traps, 22(1) N.Z. J. ZOOLOGY 39 (1995).

⁶⁸ Warburton, B. and I. Orchard, Evaluation of Five Kill Traps for Effective Capture and Killing of Australian Brushtail Possums (*Trichosurus vulpecula*), 23(4) N.Z. J. ZOOLOGY 307 (1994).

⁶⁹ Warburton, B. Evaluation of Seven Trap Models as Humane and Catch-efficient Possum Traps, 9(3) N.Z. J. ZOOLOGY 409 (1982).

⁷⁰ Phillips, R.L. 1996. Evaluation of 3 types of snares for capturing coyotes. Wildlife Society Bulletin, 24: 107-110.117 (reporting misstrikes ranging from eight to fourteen percent); Pohlmeier, K. et al., [The total efficiency of stunning traps for the capture of stone martens and red foxes in hunting situations], 102(3) DEUTSCHE TIERARZTLICHE WOCHENSCHRIFT 133 (1995) (reporting misstrikes ranging from thirteen to fifteen percent).

⁷¹ Warburton, B. et al., Effect of Jaw Shape in Kill-traps on Time to Loss of Palpebral Reflexes in Brushtail Possums, 36(1) J. WILDLIFE DISEASES 92 (2000).

⁷² *Id.*

Furthermore, these devices present a significant risk of capture of non-target species. Trap selectivity is assessed by measuring the number of individuals of the target species captured relative to the number of non-target animals (Iossa et al. 2007).⁷³ As noted in Table 6 from Iossa et al. (see below), trap selectivity varies widely with trap type. For rotating jaw traps (or Conibear traps), one study found that forty-three percent of the devices set to trap American martens captured non-target species Canada jay's and Northern flying squirrels, all of whom were found dead in the traps. In a second study assessing the selectivity of Conibear traps, thirty percent of the trapped animals were non-target species, including the American crow, rat species, and domestic house cats.

04-53

⁷³ See Iossa, G., Soulsbury, C.D., and Harris, S. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare* 2007, 16: 335-352.

Table 6 Selectivity (number of non-target animals relative to total captures), mortality and injury caused to non-target species in various types of traps.

Trap type	Target species	Non-target species	Selectivity	Mortality	Injury	Reference
<i>Killing traps</i>						
Drowning trap	<i>Ondatra zibethicus</i>	<i>Anas platyrhynchos</i> , <i>Rattus</i> spp, <i>Mustela erminea</i>	1.44-7.40% ¹	-	-	Crasson 1996
Spring trap in tunnels	<i>Mustela erminea</i> , <i>M. nivalis</i> , <i>M. vison</i>	<i>Alectoris rufus</i> , <i>Erinaceus europaeus</i> , <i>Oryctolagus cuniculus</i> , <i>Mustela putorius</i>	5%	100% ²	-	Short & Reynolds 2001
Tunnel traps/snare	-	<i>Mustela putorius</i>	-	61%	39%	Birks & Kitchener 1999
Spring trap	<i>Trichosurus</i> spp	<i>Erinaceus europaeus</i> , <i>Mustela putorius</i> , <i>Rattus</i> spp	23%	50%	50%	Warburton & Orchard 1996
Leg-hold snare/coil spring trap	<i>Oryctolagus cuniculus</i> , <i>Vulpes vulpes</i>	<i>Lynx pardinus</i>	-	64%	22.5%	Garcia-Perea 2000
Neck snare	<i>Canis latrans</i>	<i>Odocoileus hemionus</i> , <i>O. virginianus</i> , <i>Bos taurus</i>	21%	33-63%	-	Phillips 1996
Neck snare	<i>Lepus americanus</i>	<i>Martes americana</i>	50%	0%	0%	Proulx et al 1994a
Rotating jaw-trap	<i>Martes americana</i>	<i>Perisoreus canadensis</i> , <i>Glaucomys sabrinus</i>	43%	100%	-	Naylor & Novak 1994
Rotating jaw trap	<i>Martes americana</i>	<i>Corvus brachyrhynchos</i> , <i>Rattus</i> spp, <i>Felis catus</i>	30%	-	-	Proulx & Barrett 1993a
<i>Restraining traps</i>						
Box trap	<i>Felis silvestris</i> , <i>Lynx lynx</i>	<i>Meles meles</i> , <i>Ursus arctos</i>	64%	0%	0%	Potočník et al 2002
Box trap	<i>Canis familiaris</i>	<i>Corvus brachyrhynchos</i> , <i>Felis catus</i> , <i>Procyon lotor</i> , <i>Mephitis mephitis</i>	93%	-	-	Way et al 2002
Box trap	<i>Martes pennanti</i>	<i>Martes americana</i> , <i>Gulo gulo</i> , <i>Vulpes vulpes</i>	94%	1%	-	Weir 1997
Leg-hold snare	<i>Panthera leo</i>	<i>Hyena hyaena</i> , <i>Cracuta cracuta</i> , <i>Acinonyx jubatus</i>	32%	0%	17%	Frank et al 2003
Leg-hold snare	<i>Puma concolor</i>	<i>Odocoileus hemionus</i> , <i>Canis latrans</i> , <i>Bos taurus</i>	45%	17%	-	Logan et al 1999
Neck snare	<i>Vulpes vulpes</i>	<i>Canis familiaris</i> , <i>Felis catus</i> , <i>F. silvestris</i> , <i>Meles meles</i> , <i>Martes martes</i> , <i>Lutra lutra</i> , <i>Lepus europaeus</i>	46%	-	-	Chadwick et al 1997

¹ The relative % of injured and dead animals is not known.² Mortality and injury combined.

The lack of selectivity with body-gripping traps is consistently noted in the published literature. Linscombe (1976) documented 57 non-target mammals and 127 non-target birds were captured in No. 2 Victor and No. 220 Conibear traps with more non-target species, particularly birds, captured in the Conibear trap.⁷⁴ In his study of multiple trap types in Arkansas, Sasse (2018)

⁷⁴ Linscombe, G. 1976. An evaluation of the No. 2 Victor and 220 Conibear traps in coastal Louisiana. Louisiana Wildlife and Fisheries Commission.

O4-54

O4-55

found that non-target spotted skunks, a species of “greatest conservation need in Arkansas” that may warrant protection under the Endangered Species Act, were captured in body-gripping traps set for bobcats, raccoons, coyotes, and fox.⁷⁵ Neither Linscombe nor Sasse indicated whether any of the non-target animals trapped in their studies were found alive. Nor did they provide any estimates of time to death or unconsciousness. Hill (1987) found that trap mortality in non-target animals taken in No. 220 Conibear traps was “sufficiently high to make them unsuitable for conventional terrestrial trapping in the Southeastern United States, except for special situations such as for control of feral dogs, or predator populations on specific areas during rabies epizootics.”⁷⁶ No. 120 Conibear traps also captured non-target species but not in the numbers captured in the 220 traps. Davis et al. (2012), in their study of body-gripping traps in the Cape Horn Archipelago that straddles the border of Chile and Argentina, determined that a number of non-target bird species (caracaras, kelp gulls, flightless streamer ducks) and mammal species (domestic cats, feral pigs) were captured when they used an open front configuration for their trap sets.⁷⁷ These issues must be evaluated in the final EIR/EIS.

04-55
Cont.

iv. Denning Operations

Denning, which involves the use of gas canisters containing sodium nitrate to kill animals in their dens, is an inhumane practice used by WS-California to target California ground squirrels. In 2022, WS-California targeted 918 burrows.⁷⁸ When gas canisters are used, they are ignited, placed inside the active den, and then the den opening is covered with soil. When heated to 1,000 degrees, sodium nitrate explodes and produces toxic fumes of nitrous oxide and sodium oxide.⁷⁹ The resulting gas that is released, carbon monoxide, converts the hemoglobin in blood to methemoglobin, which is unable to carry oxygen,⁸⁰ effectively suffocating the animals inhabiting the den. This method often causes the deaths of entire animal families, including young. Furthermore, it is likely that this method results in the deaths of considerably more animals than WS-California reports. Since Wildlife Services technicians do not excavate burrows/dens to determine the number and species of animals killed using gas canisters, it is unclear how many animals are actually killed by this method. The number of deaths reported are merely estimates based on consideration of the species, time of year, average litter size, and anticipated number of

04-56

⁷⁵ Sasse, D. Incidental Captures of Plains Spotted Skunks (*Spilogale putorius interrupta*) By Arkansas Trappers, 2012-2017, 72 J. ARK. ACAD. OF SCI. 187 (2018); *see also* 90-Day Finding on a Petition To List the Prairie Gray Fox, the Plains Spotted Skunk, and a Distinct Population Segment of the Mearns' Eastern Cottontail in East-Central Illinois and Western Indiana as Endangered or Threatened Species, 77 Fed. Reg. 71,759 (Dec. 4, 2012).

⁷⁶ Hill, E.P. Catch Effectiveness and Selectivity of Several Traps, 3 THIRD E. WILDLIFE DAMAGE CONTROL CONF. 23 (1987).

⁷⁷ Davis, E.F. et al., American Mink (*Neovison vison*) Trapping in the Cape Horn Biosphere Reserve: Enhancing Current Trap Systems to Control an Invasive Predator, 49(1-2) ANNALES ZOOLOGICI FENNICI 12 (2012).

⁷⁸ *See, e.g.*, USDA-APHIS, Program Data Report G-2022, Filtered by State: California (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX

⁷⁹ Environmental Protection Agency - Office of Prevention - Pesticides - and Toxic Substances. 1991. RED Facts: Inorganic Nitrate/Nitrite (Sodium and Potassium Nitrates).

⁸⁰ *Id.*

young in the burrows/dens.⁸¹ The actual death toll could be significantly higher based on variations in litter size and may include non-target species. Notably, EPA labels for large and small gas cartridges warn against harm to a variety of non-target species.⁸² The draft EIS/EIR does not adequately evaluate these issues, or the potential impacts of a sub-lethal dose of carbon monoxide to target or non-target species in the event a canister is not set correctly or malfunctions. This deficit must be remedied in the final EIR/EIS.

04-56
Cont.

v. Aerial Gunning

Aerial gunning, which is sometimes used to kill coyotes in California,⁸³ is inherently inhumane for several reasons. First, this method causes extreme stress due to noise from the aircraft and from gunfire, which can harm the hearing of multiple species. Second, this method forces animals to expend critical energy reserves to escape, which may affect survival and reproduction. Third, target animals are often not killed by the first shot, which prolongs suffering and can allow maimed animals to escape. Lastly, there is a significant likelihood that dependent young will be orphaned because these operations often coincide with the peak coyote birthing period. In other NEPA documents produced by Wildlife Services on predator damage management operations in other states frequently dismiss the impact of noise on wildlife by citing a number of species-specific studies that examined the effect of aircraft overflights of wildlife,⁸⁴ but few of these studies involved an assessment of low-flying aircraft engaging in aerial predator control. It is imperative that such studies be conducted in different habitat types, at different altitudes, with real or mock gunfire, and accurate monitoring of noise levels, as well as involve third party observers to record wildlife reactions to fully assess the impact of aerial gunning on target and non-target species in order to effectively evaluate the real impact of these operations on wildlife.

04-57

Pepper et al. (2003),⁸⁵ in their study of the impacts of low flying aircraft on wildlife, found that aircraft noise, turbulence, and vibrations can adversely impact the hearing of multiple species, while the mere appearance of aircraft can cause a flight response forcing animals to expend critical energy reserves to escape the perceived threat. This energy loss, depending on the

04-58

⁸¹ U.S. Dept. of Agriculture. 2019. The Use of Carbon Monoxide in Wildlife Damage Management. Chapter VIII in Human Health and Ecological Risk Assessment for the Use of Wildlife Damage Management Methods by USDA-APHIS-Wildlife Services. Available at: https://www.aphis.usda.gov/wildlife_damage/NEPA/risk_assessment/RA8%20Gas%20Cartridge%20RA%20-%20Pepper%20Reviewed.pdf.

⁸² Keefover-Ring, W. 2009. War on Wildlife - The U.S. Department of Agriculture's "Wildlife Services" - a report to President Barack Obama and Congress. WildEarth Guardians. Available at: http://wg.convio.net/support_docs/report-war-on-wildlife-june-09-to.pdf.

⁸³ See, e.g., USDA-APHIS, Program Data Report G-2019 (2019). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2019:INDEX.

⁸⁴ See, e.g., USDA-APHIS, Wildlife Services - Wyoming, Pre-Decisional Draft Environmental Assessment, Predator Damage and Conflict Management in Wyoming 175 (July 2020).

⁸⁵ Pepper, C. B., M. A. Nascarella, and R. J. Kendall. 2003. A review of the effects of aircraft noise on wildlife and humans, current control mechanisms, and the need for further study. Environmental Management 32:418-432.

availability of food and seasonal timing of the impact, may affect survival or reproduction.⁸⁶ This should be evaluated in the draft EIR/EIS.

↑ 04-58
Cont.

Furthermore, NEPA documents produced by Wildlife Services on predator damage management operations in other states have claimed that aerial gunning results in the death of most target animals after a single pass,⁸⁷ yet the agency offered no data or studies to verify that target species are killed in a single pass or even after two passes. First, it is difficult to ascertain whether a target has been killed or merely wounded by the first shot. Targeted animals not killed by one shot prolongs suffering and can allow maimed animals to escape. This should be taken into consideration in the draft EIR/EIS, along with an assessment of factors that may affect how quickly animals are killed and the likelihood they will be injured but escape. These factors include variations depending on habitat type, shooter experience, the time it takes for an aircraft to prepare to conduct a second pass of a particular area or animal, and the likelihood of finding and killing a wounded animal if the animal has found cover. Wildlife Services should also conduct studies focused on the impact on wildlife from the noise generated by low-flying aircraft in different habitat types and at different altitudes, with real or mock gunfire, using accurate monitoring or noise levels, and using third party observers to record wildlife reactions to these activities so that the impacts of aerial gunning on both target and non-target species may be fully assessed.

04-59

Lastly, dependent young will be orphaned as a result of its aerial gunning operations, particularly given the timing of many of those operations, which often coincide with the peak coyote birthing period. NEPA documents produced by Wildlife Services on predator damage management operations in other states have claimed that technicians try to locate coyote dens in areas where aerial gunning occurs in order to kill the pups,⁸⁸ but the agency provides no data on the success of such den location searches, what proportion of estimated dens are found, or how many personnel or hours are utilized in such searches over the course of a year. Nor has the agency disclosed, discussed, or evaluated the potential fate of dependent young that are not found. The draft EIR/EIS fails to adequately evaluate these issues when assessing the question of the humaneness of aerial gunning. This deficit must be remedied in the final EIR/EIS.

04-60

f. The EIR/EIS Fails to Adequately Assess Lethal WDM Operations on Non-target Species, including Threatened and Endangered Species

04-61

The draft EIR/EIS doesn't adequately assess the numerous instances of Wildlife Services' non-selective lethal WDM activities unintentionally killing companion animals, vertebrates of

⁸⁶ *Id.*

⁸⁷ *See, e.g.*, USDA-APHIS, Wildlife Services – Wyoming, Pre-Decisional Draft Environmental Assessment, Predator Damage and Conflict Management in Wyoming 181 (July 2020).

⁸⁸ *Id.* at 212.

150 species,⁸⁹ and thousands of mammals of at least 20 different taxa that are listed as threatened or endangered federally or in certain states.⁹⁰ Since 2000, Wildlife Services has killed more than 50,000 non-target animals, including red-tailed hawks, great horned owls, kangaroo rats, armadillos, pronghorns, porcupines, long-tailed weasels, javelinas, marmots, snapping turtles, turkey vultures, great blue herons, ruddy ducks, sandhill cranes, and ringtail cats.⁹¹ Wildlife Services has also mistakenly killed threatened and endangered species that have been the subject of costly conservation efforts, including Mexican gray wolves, grizzly bears, a California condor, gray wolves, wolverines, river otters, swift and kit foxes, and bald and golden eagles.⁹² These killings undermine federal efforts to conserve and recover the affected species, which often need protection under state and/or federal laws in part due to Wildlife Services' practices.⁹³

O4-61
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We are particularly concerned about the potential for non-target animals to be caught in neck and foot snares, steel-jawed leghold traps, body-gripping traps, as well as killed by aerial gunning operations. These concerns are discussed in greater detail above in Section d. These devices are highly indiscriminate,⁹⁴ and the use of bait associated with snares and traps is very problematic because it lures not only the target species but non-target species as well, in addition to causing conflicts between animals and disrupting behavioral ecology.⁹⁵ Even research

⁸⁹ Knudson, T. The killing agency: Wildlife Services' brutal methods leave a trail of animal death—wildlife investigation. *The Sacramento Bee*, April 29, 2012; see also Tom Knudson, *Wildlife Services' Deadly Force Opens Pandora's Box of Environmental Problems*, SACRAMENTO BEE (Apr. 30, 2012). Available at: <http://www.sacbee.com/news/investigations/wildlife-investigation/article2574608.html>; B.J. Bergstrom et al., *License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function*, 7 CONSERV. LETTERS 131-42 (2013).

⁹⁰ Bergstrom, B.J., L.C. Arias, A.D. Davidson, A.W. Ferguson, L.A. Randa, and S.R. Sheffield. 2014. License to kill: reforming federal wildlife control to restore biodiversity and ecosystem function. *Conservation Letters* 7: 131-142.

⁹¹ Tom Knudson, *Suggestions in Changing Wildlife Services Range from New Practices to Outright Bans*, SACRAMENTO BEE (May 6, 2012). Available at: <http://www.sacbee.com/news/investigations/wildlife-investigation/article2574659.html>.

⁹² *Id.*

⁹³ Over the past century, Wildlife Services played a leading role in the decimation of populations of a multitude of wildlife species, contributing to the endangerment of the bald eagle, California condor, Canada lynx, kit fox, swift fox, Utah prairie dog, Gunnison's prairie dog, grizzly bear, gray wolf, Mexican gray wolf, fisher, and others. 41 Fed. Reg. (July 12, 1976) (bald eagle); U.S. Fish and Wildlife Service ("FWS"), ANIMAL DAMAGE CONTROL "MAY AFFECT" DETERMINATIONS FOR FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES, USFWS BIOLOGICAL OPINION 44 (1997) (California condor); FWS, SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM, Gunnison's prairie dog (2010); FWS, RECOVERY PLAN FOR UPLAND SPECIES OF THE SAN JOAQUIN VALLEY, CALIFORNIA (1998) (San Joaquin kit fox); FWS, UTAH PRAIRIE DOG (*CYNOMYS PARVIDENS*) REVISED RECOVERY PLAN (2012); FWS, GRIZZLY BEAR RECOVERY PLAN (1993); FWS, NORTHERN ROCKY MOUNTAIN WOLF RECOVERY PLAN (1987); FWS, SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM, WEST COAST POPULATION OF FISHER (2012). By targeting carnivores, the Wildlife Services program acts as a subsidy for livestock producers in contravention of other federal expenditures; for example, the federal government spent more than \$43 million since 1974 to recover the gray wolf. See B.J. Bergstrom et al., *License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function*, 7 CONSERV. LETTERS 131-42 (2013).

⁹⁴ Virgós, Emilio, et al., A poor international standard for trap selectivity threatens carnivore conservation. *Biodivers. Conserv.* 25 (2016) 1409-1419.

⁹⁵ J.A. Shivik, and K.S. Gruver, Animal attendance at coyote trap sites in Texas. *Wildl. Soc. Bull.* 30 (2002) 502-57; J.K. Bump, et al., Bear-Baiting May Exacerbate Wolf-Hunting Dog Conflict. *PLoS ONE* 10.1371/journal.pone.0061708 (2013); L. Dunkley, and M.R.L. Cattet, A Comprehensive Review of the Ecological and Human Social Effects of Artificial Feeding and Baiting of Wildlife, *Wildlife Damage Management*, Internet Center for Canadian Cooperative Wildlife Health Centre: Newsletters & Publications, University of Nebraska,

O4-62

conducted by Wildlife Services' NWRC shows the large number of non-target species that visit Wildlife Services' trap sites.⁹⁶ The draft EIR/EIS must address these issues in detail.

↑ O4-62
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There are several threatened or endangered species listed under the ESA and/or the California Endangered Species Act,⁹⁷ that are at particular risk from WS-California's indiscriminate methods, including wolverines, San Joaquin kit fox, Sierra Nevada red fox, gray wolves (discussed in greater detail in section O), Humboldt marten, and fishers. As well as species that are a State Candidate for Listing including the mountain lions in the Southern California and Central Coast Region and greater sage grouse.⁹⁸ It is imperative that WS-California take actions to reduce the likelihood of take of these animals.

O4-63

5. Analysis of Proposed Alternatives

We commend WS-California and CDFA for including two alternatives that focus on varying degrees of non-lethal WDM, as we requested in our scoping comments. However, WS-California and CDFA failed to consider a range of reasonable alternatives as required by NEPA. An agency's duty to consider alternatives to the proposed action has been described as the "heart" of the NEPA process. 40 C.F.R. § 1502.14. Agencies are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332(2)(E); see also 42 U.S.C. § 4332(2)(C)(iii). It is essential that NEPA documents contain "detailed and careful" analysis of the relative merits and demerits of the proposed action and proposed alternatives, a requirement which courts have characterized as the "linchpin" of the NEPA process. *Natural Resources Defense Council, Inc. v. Callaway*, 524 F.2d 79, 92 (2d Cir. 1975) (quoting *Monroe Cnty Conservation Soc'y, Inc. v. Volpe*, 472 F.2d 693, 697-98 (2d Cir. 1972)). All reasonable alternatives must receive a "rigorous exploration and objective evaluation . . . particularly those that might enhance environmental quality or avoid some or all of the adverse environmental effects." 40 C.F.R. § 1500.8(a)(4).

O4-64

The purpose of NEPA's alternatives requirement is to ensure agencies do not undertake projects "without intense consideration of other more ecologically sound courses of action, including shelving the entire project, or of accomplishing the same result by entirely different means." *Env'tl. Defense Fund, Inc. v. U.S. Army Corps of Engrs.*, 492 F.2d 1123, 1135 (5th Cir. 1974). The discussion of alternatives is intended to provide a "clear basis for choice among options by the

Lincoln, Nebraska, USA, 2003; J.L. Manning, and J.L. Baltzer, Impacts of black bear baiting on Acadian forest dynamics - An indirect edge effect? *For. Ecol. Manage.* 262 (2011) 838-844; Dunkley, L., & Cattet, M. R. L. (2003). A Comprehensive Review of the Ecological and Human Social Effects of Artificial Feeding and Baiting of Wildlife. *Canadian Cooperative Wildlife Health Centre: Newsletters & Publications.*, 21, 1-68.

O4-65

⁹⁶ Shivik, J.A., Gruver, K.S., 2002. Animal attendance at coyote trap sites in Texas. *Wildlife Society Bulletin* 30, 502-557.

⁹⁷ CESA; California Code of Regulations, Title 14, Chapter 6, §§783.0-787.9; Fish and Game Code Chapter 1.5, §§ 2050-2115.5

⁹⁸ State and Federally Listed Endangered and Threatened Animals of California. Updated January 2024. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline>

decision maker and the public.” 40 C.F.R. § 1502.14. This requirement is critical to serving NEPA’s primary purposes of ensuring fully informed decisions and providing for meaningful public participation in environmental analyses and decision-making. *See* 40 C.F.R. §1500.1(b), (c), *Friends of Yosemite Valley v. Kempthorne*, 520 F.3d 1024, 1039 (9th Cir. 2008) (the NEPA analysis must identify multiple viable alternatives, so that an agency can make “a real, informed choice” from the spectrum of reasonable options).

O4-65
Cont.

WS-California alternatives within the draft EIR/EIS maintain the assumption that lethal WDM is still necessary and ignores research and reports showing that non-lethal methods work.⁹⁹ The EIR/EIS ignores the science that demonstrates that non-lethal programs are more functionally effective than lethal control, and that lethal control may actually serve to increase predation.¹⁰⁰ It ignores the numerous non-lethal wildlife management techniques that exist and have been demonstrated to be effective.¹⁰¹ It also fails to analyze the structure of the current program and proposed action of providing lethal control for free and how that incentivizes ranchers to not take actions to prevent predation (although it makes this argument to undermine compensation programs). It fails to analyze the phenomenon that ranchers may even allow livestock to get killed on purpose in order to have carnivores killed, as admitted by a rancher.¹⁰² It also fails to address equitable management of carnivores for the public. The program’s failure to analyze alternatives that would reduce the killing of carnivores on the ground shows deep, institutional bias towards lethal control despite the growing scientific evidence to the contrary.

O4-66

These errors resulted in a biased analysis of the true impacts of WS-California’s wildlife killing program and failed to “sharply defin[e] the issues and provid[e] a clear basis for choice among options by the decisionmaker and the public.” 40 C.F.R. § 1502.14. Alternatives we proposed for consideration in our scoping comments that were not considered in the draft EIR/EIS include:

1. An alternative that would prioritize and require documented exhaustion of nonlethal methods before WS-California resorts to lethal action, except as necessary to address an immediate risk to human health or safety, or to address a

O4-67

⁹⁹ T. M. Gehring, K. C. VerCauteren, and A. C. Cellar, Good Fences Make Good Neighbors: Implementation of Electric Fencing for Establishing Effective Livestock-Protection Dogs, 5 *Human-Wildlife Interact.* 106–11 (2011); S. Davidson-Nelson and T. M. Gehring, Testing Fladry as a Nonlethal Management Tool for Wolves and Coyotes in Michigan, 4 *Human-Wildlife Interact.* 87–94 (2010); T. M. Gehring, K. C. VerCauteren, M. L. Provost, and A. C. Cellar, Utility of Livestock-Protection Dogs for Deterring Wildlife From Cattle Farms, 37 *Wildlife Res.* 715–721 (2010).

¹⁰⁰ Treves, Adrian, Miha Krofel, and Jeannine McManus. “Predator control should not be a shot in the dark.” *Frontiers in Ecology and the Environment* 14.7 (2016): 380-388.

¹⁰¹ Thompson, R., & Cassaigne, I. (2017). The empowerment of livestock owners and the education of future generations to reduce human-feline carnivore conflicts. *Conflicto entre felinos y humanos en América Latina*. Instituto de Investigación de Recursos Biológicos Alexander von Humboldt, Bogotá, DC, Colombia, 413-422. See also Scasta, J.D., Stam, B. & Windh, J.L. Rancher-reported efficacy of lethal and non-lethal livestock predation mitigation strategies for a suite of carnivores. *Sci Rep* 7, 14105 (2017) doi:10.1038/s41598-017-14462-1.

¹⁰² J. Dougherty, Last Chance for the Lobo. *High Country News* (2007). Available at: <http://www.hcn.org/issues/361/17419>.

situation for which the California Department of Fish and Wildlife has already evaluated the conflict and issued a depredation permit.¹⁰³

2. An alternative that would prevent WS-California from conducting lethal wildlife damage management operations on all public lands.
3. An alternative that would prevent WS-California from conducting lethal wildlife damage management operations in wilderness and wilderness study areas.
4. An alternative that would require the exclusive use of nonlethal methods for damage management operations targeting beavers.
5. An alternative that would require the exclusive use of nonlethal methods for damage management operations targeting predators.

O4-67
Cont.

Out of the five recommendations we made in our scoping comments, we urge WS-California to provide consideration to two alternatives in particular. We recommend that WS-California modify one of the non-lethal alternatives in the EIR/EIS to provide proper and full consideration to a wide range of alternatives. Specifically, we request an alternative that would prohibit lethal WDM on public lands including wilderness areas, and an alternative that would prioritize and require documented exhaustion of nonlethal methods before WS-California resorts to lethal action.

O4-68

6. Failure to take the requisite “hard look” at numerous issues

- e. Failure to properly consider the benefits and efficacy of non-lethal WDM over lethal WDM

Practical and feasible non-lethal alternatives suggested in our scoping comment were disregarded without full consideration despite broad public support, increased humaneness, effectiveness, and lessened negative ecosystem impacts associated with non-lethal methods. WS-California and CDFA make the case numerous times that if lethal WDM is not conducted by WS-California then private landowners would resume conflict management with less experience and less agency oversight.¹⁰⁴ We agree with concerns that agency oversight of WDM is important. However, this speculative argument fails and could be considered a self-assertion given WS-California’s clear bias toward a lethal WDM response despite robust literature that shows non-lethal effectiveness over lethal. The draft EIR/EIS provides an insufficient analysis of non-lethal alternatives to WDM.

O4-69

Scientific studies, discussed in detail below, demonstrate that nonlethal methods are effective at mitigating and preventing human-wildlife conflicts. From 2016 to 2020 at least six independent

O4-70

¹⁰³ This type of program was adopted by Humboldt County in May 2020. See Amendment 1 to the Cooperative Service Agreement (CSA) between Humboldt County (Cooperator) and United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Wildlife Services (WS) (May 5, 2020) (attached).

¹⁰⁴ EIS/EIR at 4.2.1-10-11

scientific teams have published nine reviews of evidence addressing lethal carnivore control in response to livestock losses. The scientific consensus is clear that there is better evidence for functional effectiveness in preventing livestock losses from non-lethal methods than from lethal methods and the quality of evidence is higher for studies involving non-lethal methods. These reviews include:

- A. Eklund, A., López-Bao, J.V., Tourani, M., Chapron, G., Frank, J., 2017. Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Scientific Reports*.
- B. Khorozyan, I., & Waltert, M. (2020). Variation and conservation implications of the effectiveness of anti-bear interventions. *Scientific Reports*, 10(1), 1–9.
- C. Lennox, R.J., Gallagher, A.J., Ritchie, E.G., Cooke, S.J., 2018. Evaluating the efficacy of predator removal in a conflict-prone world. *Biological Conservation* 224, 277-289.
- D. Miller, J., Stoner, K., Cejtin, M., Meyer, T., Middleton, A., Schmitz, O., 2016. Effectiveness of Contemporary Techniques for Reducing Livestock Depredations by Large Carnivores. *Wildlife Society Bulletin* 40, 806-815.
- E. Moreira-Arce, D., Ugarte, C.S., Zorondo-Rodríguez, F., Simonetti, J.A., 2018. Management Tools to Reduce Carnivore-Livestock Conflicts: Current Gap and Future Challenges. *Rangeland Ecology & Management*.
- F. Treves, A., Krofel, M., McManus, J., 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14, 380-388.
- G. Treves, A., Krofel, M., Ohrens, O., Van Eeden, L.M., 2019. Predator control needs a standard of unbiased randomized experiments with cross-over design. *Frontiers in Ecology and Evolution* 7 402-413.
- H. van Eeden, L.M., Crowther, M.S., Dickman, C.R., Macdonald, D.W., Ripple, W.J., Ritchie, E.G., Newsome, T.M., 2018. Managing conflict between large carnivores and livestock. *Conservation Biology*.
- I. van Eeden, L.M., Ann Eklund, Jennifer R. B. Miller, José Vicente López-Bao, Mikael R. Cejtin, Guillaume Chapron, Mathew S. Crowther, Christopher R. Dickman, Jens Frank, Miha Krofel, David W. Macdonald, Jeannine McManus, Tara K. Meyer, Arthur D. Middleton, Thomas M. Newsome, William J. Ripple, Euan G. Ritchie, Oswald J. Schmitz, Kelly J. Stoner, Mahdieh Tourani, Treves, A., 2018. Carnivore conservation needs evidence-based livestock protection. *PLoS Biology*.
- J. Treves, A., Fergus, A. R., Hermanstorfer, S. J., Louchouart, N. X., Ohrens, O., & Pineda-Guerrero, A. (2023). Gold-standard experiments to deter predators from attacking farm animals. *AgriRxiv*, 14(1).

O4-70
Cont.

- K. Khorozyan, I. (2021). Defining practical and robust study designs for interventions targeted at terrestrial mammalian predators. *Conservation Biology*, April, 1–11.
- L. Khorozyan, I., & Waltert, M. (2021). A global view on evidence-based effectiveness of interventions used to protect livestock from wild cats. *Conservation Science and Practice*, 3(2), 1–13.
- M. Bruns, A., Waltert, M., & Khorozyan, I. (2020). The effectiveness of livestock protection measures against wolves (*Canis lupus*) and implications for their co-existence with humans. *Global Ecology and Conservation*, 21, e00868.
- N. Khorozyan, I., & Waltert, M. (2019). How long do anti-predator interventions remain effective ? Patterns , thresholds and uncertainty. *Royal Society Open Science*, 6(190826).

Considering the body of literature cited above suggests the analysis of alternatives is clearly biased in favor of the use of lethal methods and, for that reason, against Alternatives 2 and 3 (and our proposed Alternative (1) above). The analysis erroneously presupposes that having lethal methods available is somehow more effective for conflict resolution and reduction, even as a last resort, than non-lethal methods, when the best scientific literature available does not support that assertion. In fact, the analysis does not cite a single study suggesting lethal methods are an effective and long-term conflict resolution strategy. Clearly, the scientific literature suggests that consistent use of non-lethal methods has been proven to be a more effective long-term solution than lethal methods, yet this literature and its results are absent from the draft EIS.

Many of these studies, such as Khorozyan et al. 2020; Treves et al. 2019, and van Eeden et al. 2018 were published in the world's top scientific journals based on the criteria of impact factor and editorial adherence to the independent Committee on Publication Ethics. The strength of inference and lack of bias in scientific studies is paramount to the use of research as evidence, yet multiple studies sponsored by Wildlife Services or conducted by the agency from the 1970s to 2002 often have a poor record of scientific reliability on the topic of predator control due to fatal flaws in research design due to biases, whether intentional or unintentional.¹⁰⁵ Moreover, the few outdated studies that show the desired effects of predation reduction have been shown to have fatal flaws in research design, so their conclusions are unreliable.¹⁰⁶

The second concern with lethal control, besides its poor history of research design, is that lethal methods have produced recurrent counterproductive effects leading to more livestock losses in Europe and North America. Most lethal control is implemented indirectly with traps, or far from the site of predation, or long afterwards. Perhaps, at a site with few territorial large

¹⁰⁵ Treves, A., Krofel, M., McManus, J., 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14, 380-388.

¹⁰⁶ *Id.*

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O4-71

O4-72

O4-73

carnivores, such as African lions, killing a lioness returning to a carcass soon after predation might protect other livestock¹⁰⁷, but experiments with such methods also show surprisingly high error rates¹⁰⁸. Indeed, recent, independent research in several regions found killing wild animals could exacerbate future threats to human interests, e.g., cougars¹⁰⁹, birds¹¹⁰, and wolves¹¹¹ – without requiring us to delve into the unresolved controversy and contested evidence about wolves in the Northern Rocky Mountains or in Southern Europe¹¹². The draft EIR/EIS does not evaluate these studies and best available science on the higher effectiveness of non-lethal WDM over lethal which is less effective and at times counterproductive for addressing conflict.

O4-73
Cont.

In the draft EIR/EIS, WS-California claims that it practices “Proactive” or “Preventative” coyote killing WDM, in which “reducing the number of predators, specifically coyotes, operating in a territory near livestock, the risk of damage at the time is potentially reduced.”¹¹³ Yet evidence for the functional effectiveness of such ‘proactive/preventative’ practices is clearly lacking, from the EIS and in the scientific literature. Conner et al. 1998 is the only reliable study evaluating the effects of lethal control on future livestock losses.¹¹⁴ That study showed that the after-effects of lethal control were sometimes positive (lower livestock losses),

O4-74

¹⁰⁷ Woodroffe, R., Frank, L.G., 2005. Lethal control of African lions (*Panthera leo*): local and regional population impacts. *Animal Conservation* 8, 91-98.

¹⁰⁸ Sacks, B.N., Blejwas, K.M., Jaeger, M.M., 1999. Relative vulnerability of coyotes to removal methods on a northern California ranch. *Journal of Wildlife Management* 63, 939-949.

¹⁰⁹ Cooley, H.S., Wielgus, R.B., Koehler, G.M., Maletzke, B.T., 2009. Source populations in carnivore management: cougar demography and emigration in a lightly hunted population. *Animal Conservation* 12, 321-328; Cooley, H.S., Wielgus, R.B., Robinson, H.S., Koehler, G.M., Maletzke, B.T., 2009. Does hunting regulate cougar populations? A test of the compensatory mortality hypothesis. *Ecology* 90, 2913-2921; Peebles, K., Wielgus, R.B., Maletzke, B.T., Swanson, M.E., 2013. Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations. *PLoS ONE* 8, e79713.

¹¹⁰ Bauer, S., Lisovski, S., Eikelenboom-Kil, R.J.F.M., Shariati, M., Nolet, B.A., 2018. Shooting may aggravate rather than alleviate conflicts between migratory geese and agriculture. *Journal of Applied Ecology* 55, 2653-2662; Beggs, R., Tulloch, A.I.T., Pierson, J., Blanchard, W., Crane, M., Lindemayer, D.L., 2019. Patch-scale culls of an overabundant bird defeated by immediate recolonization. *Ecological Applications* 29, e01846.

¹¹¹ Santiago-Avila, F.J., Comman, A.M., Treves, A., 2018. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS ONE* 10.1371/journal.pone.0189729; Santiago-Avila, F.J., Comman, A.M., & Treves, A. (2018). Correction: Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS One*, 209716.

¹¹² Bradley, E.H., Robinson, H.S., Bangs, E.E., Kunkel, K., Jimenez, M.D., Gude, J.A., Grimm, T., 2015. Effects of Wolf Removal on Livestock Depredation Recurrence and Wolf Recovery in Montana, Idaho, and Wyoming. *Journal of Wildlife Management* 79, 1337-1346; Fernández-Gil, A., Naves, J., Ordiz, A.s., Quevedo, M., Revilla, E., Delibes, M., 2015. Conflict Misleads Large Carnivore Management and Conservation: Brown Bears and Wolves in Spain. *PLoS ONE* DOI:10.1371/journal.pone.0151541, 1-13; Imbert, C., Caniglia, R., Fabbri, E., Milanese, P., Randi, E., Serafini, M., Torretta, E., Meriggi, A., 2016. Why do wolves eat livestock? Factors influencing wolf diet in northern Italy. *Biological Conservation* 195, 156-168; Kompaniyets, L., Evans, M., 2017. Modeling the relationship between wolf control and cattle depredation. *PLoS ONE* 12, e0187264; Poudyal, N., Baral, N., T., A.S., 2016. Wolf lethal control and depredations: counter-evidence from respecified models. *PLoS ONE* 11, e0148743; Wielgus, R.B., Peebles, K., 2014. Effects of wolf mortality on livestock depredations. *PLoS ONE* 9, e113505; see also Santiago-Avila, F.J., Comman, A.M., Treves, A., 2018. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS ONE* 10.1371/journal.pone.0189729.

¹¹³ EIR/EIS at 3.16

¹¹⁴ Conner, M.M., Jaeger, M.M., Weller, T.J., McCullough, D.R., 1998. Effect of coyote removal on sheep depredation in northern California. *Journal of Wildlife Management* 62, 690-699.

sometimes ineffective (no change in livestock losses), and sometimes counter-productive (higher livestock losses), with the latter two results predominating in a multi-year dataset (see also Treves et al. 2016). We emphasize this study for coyotes because previous studies at the same site or in private livestock operations have been judged unreliable.¹¹⁵ Indeed, other studies show that coyotes compensate powerfully for lethal controls through increased reproductive rates and that destabilizing packs by killing territorial adults may exacerbate predation problems.

O4-74
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Killing one or a few coyotes in an area will leave vacancies and social instability that can invite a greater number of newcomers (ie., migration) than the number of residents removed and encourage more breeding.¹¹⁶ Unexploited coyote populations are self-regulating based on the availability of food and habitat and territorial defense by resident family groups. Typically, only the dominant pair in a pack of coyotes reproduces, and they behaviorally suppress reproduction among subordinate members of the group. When one or both members of the dominant pair are killed, socially bonded packs break up, and subordinate members disperse, find mates and reproduce. More coyotes breed at younger ages, and more pups survive following a temporary increase in available prey. These factors work synergistically to quickly increase coyote populations, compensating for any reductions following exploitation events.¹¹⁷

O4-75

Recent studies also found that hunting of cougars may increase conflicts with livestock. Specifically, cougar hunting destabilizes the social structure of cougars in the wild, disrupting cougars' sex-age structure and tilting cougar populations so that they are composed of younger males. Younger males are more likely to engage in livestock depredations than animals in stable, older populations.¹¹⁸ Additionally, another recent study suggests that carnivores may increase prey kills as a result of stress from hunting.¹¹⁹

O4-76

We cannot find any truly meaningful discussion of this issue in the draft EIR/EIS. The EIR/EIS's attempt to merely discount this issue because WS-California program will not wholly eradicate apex predators from the landscape is insufficient in light of evidence that

O4-77

¹¹⁵ *Id.*

¹¹⁶ 4 Kilgo, J. C., Shaw, C. E., Vukovich, M., Conroy, M. J., & Ruth, C. (2017). Reproductive characteristics of a coyote population before and during exploitation. *Journal of Wildlife Management*, 81(8), 1386–1393. F. F. Knowlton, E. M. Gese, and M. M. Jaeger, Coyote Depredation Control: An Interface between Biology and Management, *Journal of Range Management* 52, no. 5 (1999); Robert Crabtree and Jennifer Sheldon, Coyotes and Canid Coexistence in Yellowstone, in *Carnivores in Ecosystems: The Yellowstone Experience*, ed. T. Clark et al. (New Haven [Conn.]: Yale University Press, 1999); J. M. Goodrich and S. W. Buskirk, Control of Abundant Native Vertebrates for Conservation of Endangered Species, *Conservation Biology* 9, no. 6 (1995).

¹¹⁷ F.F. Knowlton. 1972. Preliminary interpretations of coyote population mechanics with some management implications. *J. Wildlife Management*. 36:369-382.

¹¹⁸ K.A. Peebles, R.B. Wielgus, B.T. Maletzke, and M.E. Swanson, Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations, 8 *PLoS One* 1–8 (2013); C. Lambert et al., Cougar Population Dynamics and Viability in the Pacific Northwest, 70 *J. Wildl. Manage.* 246–54 (2006).

¹¹⁹ H.M. Bryan et al., Heavily Hunted Wolves Have Higher Stress and Reproductive Steroids than Wolves with Lower Hunting Pressure, 29 *Funct. Ecol.* 347–56 (2015).

disruption of the species' spatio-temporal activities, social fabric and life-history events (e.g., reproduction or hibernation) can also have substantial ecological and evolutionary impacts.¹²⁰ As is the argument that if WS-California is discontinued, predator killing WDM activities will just resume among private parties. The issue of the relative ineffectiveness of lethal methods relative to non-lethal ones also cuts to the heart of whether the lethal WDM program is actually achieving its stated goal of protecting domestic animals or should be replaced by non-lethal methods except in the rarest circumstances. The agency should fully evaluate all relevant studies cited in this comment.

O4-77
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a. Ecological impacts of removing carnivores

WS-California must consider its wildlife killing program's impacts on biodiversity and ecosystems in sufficient detail, and cannot overlook the fact that its program has significant impacts to ecosystem integrity. The current wildlife killing program raises significant concerns about the potential for trophic cascades and mesopredator release. WS-California must consider the numerous credible studies opposing lethal carnivore control on these grounds.¹²¹ This issue warrants an in-depth analysis, even if WS-California does not intend to eradicate native wildlife populations, and keep wildlife killing within "sustainable mortality threshold." Adverse ecosystem effects can occur well before the eradication of a species at both local and regional scales.¹²²

O4-78

In Fiscal Year 2022, WS-California reported that it killed/euthanized or removed/destroyed 22,854 animals in California including 17,641 native animals.¹²³ The removal of so many animals from the environment – especially carnivores – certainly alters native ecosystems directly, indirectly, and cumulatively.¹²⁴

O4-79

Indeed, literature indicates that killing wildlife at this scale has contributed to the localized

¹²⁰ Moll, R. J., Jackson, P. J., Wakeling, B. F., Lackey, C. W., Beckmann, J. P., Millspaugh, J. J., & Montgomery, R. A. (2021). An apex carnivore's life history mediates a predator cascade. *Oecologia*, 196(1), 223–234.; Ordiz, A., Bischof, R., & Swenson, J. E. (2013). Saving large carnivores, but losing the apex predator? *Biological Conservation*, 168, 128–133; Bump, J., Gable, T., Johnson-Bice, S., Homkes, A., Freund, D., Windels, S., & Chakrabarti, S. (2022). Predator personalities alter ecosystem services. *Frontiers in Ecology and the Environment*, 20(5), 275–277; Leo, V., Reading, R. P., Gordon, C., & Letnic, M. (2018). Apex predator suppression is linked to restructuring of ecosystems via multiple ecological pathways. *Oikos*, 1–10.

¹²¹ See Carter, N. H., et al. (2019). Integrated spatial analysis for human-wildlife coexistence in the American West. *Environmental Research Letters* (highlighting the need for greater consideration of full ecological impact of predator removal).

¹²² See note 103.

¹²³ U.S. Dept. of Agriculture, Animal & Plant Health Inspection Service, Wildlife Services, Program Data Report G – Filtered by State: California (2022). Available at: https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/pdr/?file=PDR-G_Report&p=2022:INDEX; (noting 22,854 total animals were killed/euthanized and removed/destroyed by WS-California in 2022, including 5,213 invasive species).

¹²⁴ John Winnie Jr., Scott Creel; Montana State University. "The many effects of carnivores on their prey and their implications for trophic cascades, and ecosystem structure and function," *Food Webs*, Volume 12, September 2017, Pages 88-94.

O4-80

extinction (extirpation) of many North American species, and has fundamentally altered ecosystems at a local, regional, and continental scale.¹²⁵ There is a consensus emerging among ecologists that extirpated, depleted, and destabilized populations of large predators are negatively affecting the biodiversity and resilience of ecosystems.¹²⁶

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An overview of ecological principles illustrates this. “Predators” are animals that prey on other animals.¹²⁷ “Apex” predators such as wolves, mountain lions, and coyotes (in some contexts) have few or no predators of their own and occupy the top of the food chain.¹²⁸ Apex predators create a trophic cascade of beneficial effects that flow through and sustain ecosystems and the web of life.¹²⁹ For example, coyotes help to control disease transmission by keeping rodent populations in check, consume carrion, remove sick animals from the gene pool, disperse seeds, protect ground-nesting birds from smaller carnivores, and increase the biological diversity of plant and wildlife communities.¹³⁰ Additionally, wolves in Yellowstone and Grand Teton National Parks have been found to benefit a host of species, including aspen, songbirds, beavers, bison, fish, pronghorn, foxes, and grizzly bears.¹³¹ By reducing numbers and inducing elk to move, wolves have reduced browsing on aspen and other streamside vegetation, which has benefitted beavers, songbirds and fish populations. Studies have also shown how wolves and coyotes interact, and how wolves can aid pronghorn populations because “wolves suppress[] coyotes and consequently fawn depredation.”¹³² Wolves also benefit scavengers by leaving

¹²⁵ Ripple, William J., Thomas P. Rooney, and Robert L. Beschta. “Large predators, deer, and trophic cascades in boreal and temperate ecosystems.” *Trophic cascades: predators, prey, and the changing dynamics of nature* (2010): 141-161.

¹²⁶ Bradley J. Bergstrom, *Carnivore conservation: shifting the paradigm from control to coexistence*, *Journal of Mammalogy*, Volume 98, Issue 1, 8 February 2017, Pages 1–6, <https://doi.org/10.1093/jmammal/gyw185>; See also note 103.

¹²⁷ A.S. Leopold et. al., *Carnivore and Rodent Control in the United States* 9 (1964) (“The assertion that native birds and mammals are in general need of protection from native carnivores is supported weakly, if at all, by the enormous amount of wildlife research on the subject conducted in the past two or three decades.”).

¹²⁸ L. R. Prugh et al., *The Rise of the Mesopredator*, 59 *Bioscience* 779–91 (2009).

¹²⁹ J.A. Estes et al., *Trophic Downgrading of Planet Earth*, 333 *Science* 301–06 (2011); W. J. Ripple, R. L. Beschta, *Trophic Cascades in Yellowstone: The First 15 Years After Wolf Reintroduction*, 145 *Biological Conservation* 205–13 (2012); W. J. Ripple, R. L. Beschta, J. K. Fortin, and C. T. Robbins, *Trophic Cascades From Wolves to Grizzly Bears in Yellowstone*, 83 *J. Animal Ecology* 223–33 (2014).

¹³⁰ S. E. Henke and F. C. Bryant, *Effects of Coyote Removal on the Faunal Community in Western Texas*, 63 *Journal of Wildlife Management* 1066 (1999); K. R. Crooks and M. E. Soule, *Mesopredator Release and Avifaunal Extinctions in a Fragmented System*, 400 *Nature* 563 (1999); E. T. Mezquida, et al., *Sage-Grouse and Indirect Interactions: Potential Implications of Coyote Control on Sage-Grouse Populations*, 108 *Condor* 747 (2006). Available at: http://repository.uwyo.edu/cgi/viewcontent.cgi?article=1003&context=zoology_facpub; N. M. Waser et al., *Coyotes, Deer, and Wildflowers: Diverse Evidence Points to a Trophic Cascade*, 101 *Naturwissenschaften* 427 (2014).

¹³¹ B.J. Bergstrom et al., *License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function*, 7 *CONSERV. LETTERS* 131–42 (2013); J.A. Estes et al., *Trophic Downgrading of Planet Earth*, 333 *SCIENCE* 301–06 (2011); W. J. Ripple, R. L. Beschta, *Trophic Cascades in Yellowstone: The First 15 Years After Wolf Reintroduction*, 145 *BIOL. CONSERV.* 205–13 (2012).

¹³² B.J. Bergstrom et al., *License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function*, 7 *CONSERV. LETTERS* 131–42 (2013); L. R. Prugh et al., *The Rise of the Mesopredator*, 59 *BIOSCIENCE* 779–91 (2009); K.M. Berger and E.M. Gese, *Does Interference Competition with Wolves Limit the Distribution and Abundance of Coyotes?* 76 *J. ANIM. ECOL.* 1075–85 (2007); D.W. Smith, R.O. Peterson, D.B.

04-81

carrion derived from predation; hence, wolf removal leads to reduced abundance of carrion for scavengers in specific areas.¹³³ For instance, the extirpation of wolves works to the detriment of grizzly bears, which are listed as a threatened species and which, in addition to acting as apex predators, can steal wolf kills. A 2013 study showed that wolves benefit grizzly bears in Yellowstone through another trophic mechanism as well; specifically, wolf predation on elk has led to less elk browsing of berry- producing shrubs, providing grizzlies with access to larger quantities of fruit.¹³⁴

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The removal of apex predators may have other unexpected outcomes; for example, it can cause the “release” of mid-sized or “mesopredators” like foxes, raccoons, and skunks that are not at the top of the food chain in the presence of coyotes.¹³⁵ Increased abundance of mesopredators in turn can negatively affect populations and diversity of other species, including ground-nesting birds, rodents, lagomorphs, and others.¹³⁶ In some cases, declines in these species result in reduced prey for other carnivores and contribute to their decline and extirpation. Studies have also found that coyotes have a positive effect on rodent species diversity. For example, one study determined that Ord’s kangaroo rat became the dominant species in areas without coyotes.¹³⁷ As their numbers increased, so did their competitive advantage. This had an overall negative effect on species diversity and richness throughout the ecosystem. Correspondingly, coyotes were found to keep kangaroo rat populations in check, which removed their competitive advantage and increased overall rodent species diversity.

O4-82

WS-California fails to fully evaluate the trophic cascade effects of predator control in the EIR/EIS. For example, the EIR/EIS claims that coyote populations will not be negatively affected if less than 50 percent of the population is removed annually, which could occur in perpetuity.¹³⁸ This analysis fails to consider the trophic cascade effects of predator control, such

Houston, *Yellowstone After Wolves*, 53 *BIOSCIENCE* 330 (2003); R.L. Beschta and W.J. Ripple, *Riparian Vegetation Recovery in Yellowstone: The First Two Decades After Wolf Reintroduction*, 198 *BIOL. CONSERV.* 93–103 (2016); D.G. Flagel, G.E. Belovsky, and D.E. Beyer, *Natural and Experimental Tests of Trophic Cascades: Gray Wolves and White-tailed Deer in a Great Lakes Forest*, 180 *OECOLOGIA* 1183–94 (2016).

¹³³ W.J. Ripple and R.L. Beschta, *Trophic Cascades in Yellowstone: The First 15 Years After Wolf Reintroduction*, 145 *BIOL. CONSERV.* 205–13 (2012); C.C. Wilmsers, R.L. Crabtree, D.W. Smith, K.M. Murphy, and W.M. Getz, *Trophic Facilitation by Introduced Top Predators: Grey Wolf Subsidies to Scavengers in Yellowstone National Park*, 72 *J. ANIM. ECOL.* 909–16 (2003); C.C. Wilmsers, D.R. Stahler, R.L. Crabtree, D.W. Smith, and W.M. Getz, *Resource Dispersion and Consumer Dominance: Scavenging at Wolf- and Hunter-Killed Carcasses in Greater Yellowstone, USA*, 6 *ECOL. LETTERS* 996–1003 (2003).

¹³⁴ W.J. Ripple, A.J. Wirsing, C.C. Wilmsers, and M. Letnic, *Widespread Mesopredator Effects After Wolf Extirpation*, 160 *BIOL. CONSERV.* 70–79 (2013).

¹³⁵ L. R. Prugh et al., *The Rise of the Mesopredator*, 59 *BIOSCIENCE* 779–91 (2009); K. Crooks and M. Soulé, *Mesopredator Release and Avifaunal Extinctions in a Fragmented System*, 400 *NATURE* 563–66 (1999) (noting that although coyotes are mesopredators when wolves are present, they can act as apex carnivores where wolves have been extirpated).

¹³⁶ Ripple, William J., et al. “Widespread mesopredator effects after wolf extirpation.” *Biological Conservation* 160 (2013): 70–79.

¹³⁷ S.F. Henke and F.C. Bryan, *Effects of Coyote Removal on the Faunal Community in Western Texas*, 63 *J. WILDL. MANAGE.* 1066–81 (1999).

¹³⁸ EIR/EIS at 4.2.2-20

O4-83

as the ecological impact of coyote-rodent control, the cascading impacts along the food chain, as well as dispersal of seeds, protection of ground-nesting birds from smaller carnivores, and increases in the biological diversity of plant and wildlife communities.

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Moreover, the EIR/EIS fails to consider the localized impact of removal or the establishment of an adequate baseline for local populations (discussed in further detail below), beyond the simple assertion that while local populations may experience a brief and temporary decline, other coyotes will re-occupy the area. Even if the state's population of coyotes may remain stable as a whole with removal rates of less than 50 percent, the EIR/EIS fails to consider the impact on local ecosystems. If the majority of coyotes were removed from an isolated ecosystem (say, 80 percent of the total number of coyotes removed in the state are removed from one region) the local impact would be different than the impact to another region where far fewer coyotes were removed. The stability of the population in the state as a whole cannot be the only relevant metric, since it is, by itself, woefully inadequate to address the real ecological impact(s) of removal of an apex predator from an ecosystem. Proper site-specific analysis is required in the final EIS in order to analyze disproportionate population impacts on local habitats and regions. Site-specific population data is required in order for true consideration of these disproportionate impacts upon localities.

O4-84

O. The Final EIR/EIS Must Include a Section Analyzing the Impacts of WDM Activities on Wolves in California, a Federally and State Listed Endangered Species.

a. The Draft EIR/EIS Contains No Analysis of Wolves.

The Draft EIR's/EIS's analysis of Biological Resources (Chapter 4) lacks any analysis of the potential impacts of Wildlife Damage Management (WDM) on wolves (*Canis lupus*), a species listed as endangered in California under both state and federal law. This constitutes a significant gap which must be corrected in the final version of the EIR/EIS. Other "special status" mammals are analyzed in this chapter, including mountain lion (*Puma concolor*) which is a candidate for full state protections in a portion of this species' range. Yet the Draft EIR/EIS contains no analysis of the gray wolf despite presence in the state of a nascent population of around 45-50 wolves inhabiting portions of at least eight counties.

O4-85

b. The BTR Accompanying the Draft EIR/EIS as Appendix D Contains No Analysis of Wolves.

Similarly, Appendix D for the EIR/EIS, "Biological Technical Report Wildlife Damage Management Project," (hereafter, BTR) contains no section on wolves. This is a notable gap which must be remedied in the final version of the EIR/EIS since the stated purpose of the BTR is to evaluate "*the potential impacts on biological resources associated with WDM activities performed by the CDEA and the various California counties under the Proposed Project as*

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required by the California Environmental Quality Act (CEQA), and by WS-California as required by the National Environmental Policy Act (NEPA). This Report provides analyses of potential impacts to biological resources, including federally-listed and state-listed threatened and endangered species.”¹³⁹

- Chapter 4 of the BTR contains a section titled “Non-Target Species Analysis”. This section includes several tables which list non-target species by name and the average number of non-lethal capture and average number of lethal take for each of the named species during the baseline period of 2010-2019. The fact that no gray wolf was either non-lethally captured or lethally taken by WS-CA during that period does not mean the species should have been excluded from the tables. Other non-target species with zero capture or zero take averages are included, and the gray wolf should have been, as well.
- Chapter 5 of the BTR is a summary of WDM by county and each county’s description identifies the main species which are the subject of management activities. In most if not all counties – including every single county in which wolves currently are residing in 2024 -- coyotes are an identified subject of WDM activities. WDM activities to control coyotes, per Draft EIR/EIS Appendix C, involve the use of methods such as traps, snares, ground shooting, aerial gunning, and denning (killing animals in dens with the use of fumigants). All of these activities, which are discussed at length below, place wolves at risk.
 - c. The Summary of Methods Used During Lethal and Non-Lethal WDM Activities which Accompanies the Draft EIR/EIS as Appendix C Contains No Analysis of Impacts of the Methods on Wolves.

Appendix C of the Draft EIR/EIS provides detailed descriptions of all methods used during lethal and non-lethal Wildlife Damage Management (WDM) activities to resolve wildlife damage situations. Many of the described methods (*e.g.*, traps, snares, ground shooting, aerial gunning, and denning) place wolves at risk. This makes it all the more essential that Chapter 4 of the EIR/EIS and the BTR contained in Appendix D of the EIR/EIS must include discussions and analyses of the impacts of WDM activities and methods on wolves, a biological resource which is federally and state listed as endangered in California.

- d. The Biological Assessment (BA) by WS-CA on Impacts to Wolves is Not – But Should Be -- Included or Directly Referenced in the EIR/EIS.

WS-CA prepared a Biological Assessment (BA) on the “*Effects of Integrated Wildlife Damage Management for the Protection of Agriculture, Property, and Public Safety on Gray Wolves in California.*” The BA is dated May 2020. In its executive summary, the BA notes that an Informal Section 7 Consultation with US Fish and Wildlife Service (USFWS) was conducted in 2012, to

¹³⁹ BTR at p. 1.

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address possible effects on adult gray wolves in California. The 2012 consultation was initiated following the dispersal into California in late 2011 of an adult male wolf from Oregon known as OR-7. USFWS' 2014 concurrence letter in response to the 2012 informal consultation concurred with WS's effect determination that Integrated Wildlife Damage Management (IWDM) activities at that time may affect but are not likely to adversely affect gray wolves. The executive summary for the 2020 BA goes on to state that, in the intervening years, there has been increased dispersal of wolves into California and also pups born in California. As a result, WS sought to reconfirm the 2012 Informal Consult and prepared a BA for consideration by USFWS. In its 2020 BA, WS-CA provides:

- A chronology of consultation history by WS-CA with US Fish and Wildlife Service (USFWS) re: gray wolves in California; a project description of its current WDM program in California; a species description; and a description of legal status and population of wolves outside of California and within California at the time of preparation of the BA.
- A description of minimization measures that WS-CA IWDM activities incorporate to “effectively avoid or minimize taking or killing an adult or juvenile wolf” under its proposed action, in occupied wolf range (defined as “areas of confirmed presence of resident breeding packs or pairs of gray wolves or areas consistently used by \geq one resident gray wolf or wolves over a period of at least one month”), specifically an area of:¹⁴⁰
 - o “5-mile radius around all locations of gray wolves and wolf sign confirmed as described above (non-radio monitored)”;
 - o “5-mile radius around radio locations of resident gray wolves when < 20 radio locations are available (for radio monitored gray wolves only), or”
 - o “3-mile radius around the convex polygon developed from ≥ 20 radio locations of a pack, air, or single wolf taken over a period of ≥ 6 months (for radio-monitored gray wolves).”
- A description of minimizing measures established during the 2012 informal section 7 consultation with USFWS that are still being taken.¹⁴¹
- A description of additional minimization measures that WS-CA will implement, which include the following:¹⁴²
 - o No traps or snares will be used “within 1 mile proximity to any known occupied den sites, rendezvous sites, or areas of recently documented pup activity from

¹⁴⁰ BA at p. 24.

¹⁴¹ *Id.*

¹⁴² BA at p. 25.

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- June 1 to October 1 each year, unless approved on a case-by-case basis by USFWS.”* ↑ 04-94
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- o No dog work will be used “*within 1 mile proximity to occupied den sites, rendezvous sites, or areas of recently documented pup activity from June 1 to October 1 each year, unless approved on a case-by-case basis by USFWS.”* 04-95
 - o In areas of new gray wolf activity, WS-CA will follow all minimization measures identified in the BA and these will remain in effect for a 2-week period after new wolf activity is documented. If after two weeks of monitoring and three attempts to search the location, if no additional wolf sign or activity is detected, WS-CA will resume regular activities in the area. 04-96
 - A description of the effects of the proposed action, including accidental injury or death as a non-target animal and changes to normal behavior such as “avoidance of certain parts of territory or moving of a den site” in response to non-lethal efforts such as fladry and increased human presence. 04-97
 - o The BA acknowledges the potential for incidental take due to increase of in-migrating wolves, the established Lassen pack and the occurrence of pups, and that “*risk of incidental take may increase as gray wolves become more prevalent in California.*”¹⁴³ [Emphasis added.] 04-98
 - o The BA acknowledges that “*lethal predator control activities that are undertaken to minimize livestock losses*” could adversely affect gray wolves by potentially harming or killing gray wolves or their pups.¹⁴⁴ [Emphasis added.] 04-99
 - o The BA acknowledges that “*nonlethal actions designed to target gray wolves involved in conflicts with livestock may cause disturbance to gray wolves.*”¹⁴⁵ [Emphasis added.] 04-100
 - A description of the cumulative effects of the proposed action, which include “*unauthorized human-induced mortality from vehicle strikes or other types of accidental take, and unauthorized illegal take (poaching). Therefore, as wolves continue to disperse into new areas, there may be an increase in the likelihood of effects on wolves.*”¹⁴⁶ [Emphasis added.] 04-101
 - WS-CA’s Determination that its IWDM activities in California “*may affect and is likely to adversely affect federally [and state] protected wolves in California*” and that ↓ 04-102

¹⁴³ BA at p. 26.

¹⁴⁴ *Id.*

¹⁴⁵ BA at p. 28.

¹⁴⁶ *Id.*

“anticipated impacts from IWDM activities may capture and/or kill gray wolves.”¹⁴⁷
[Emphasis added.]

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- e. The Biological Opinion (BiOp) Prepared by USFWS as Part of Formal Consultation in Response to WS-CA’s Gray Wolf BA is Not – But Should Be -- Included or Directly Referenced in the EIR/EIS.

On July 21, 2020, USFWS responded to WS-CA’s request for Formal Section 7 Consultation by providing a Biological Opinion (BiOp) which USFWS had prepared in response to WS-CA’s gray wolf BA. The BiOp, according to USFWS, is valid for five years from the date of its signing unless reinitiation of consultation is triggered.¹⁴⁸ In its BiOp, USFWS provides:

- A chronology of consultation history by WS-CA with USFWS regarding wolves in California from 2012 through 2020; a description of WS-CA’s proposed action; and a jeopardy analysis which considers the status of the species, the environmental baseline, the effects of the action, and the cumulative effects in the action area on the gray wolf.
 - At the time the jeopardy analysis was conducted, the environmental baseline for wolves in California was one pack -- the Lassen pack, composed of six wolves -- and no known dispersing wolves at the time.¹⁴⁹
 - As described in more detail below, California now has at least seven times that many packs, and eight times as many wolves, inhabiting four times as many counties.
 - **In its assessment of the effects of the proposed action, the BiOp identified multiple proposed WS-CA activities that may affect gray wolves:** [Emphasis added.] ground shooting; aerial operations; snares; live capture traps; use of trained dogs; quick-kill traps; gas cartridges (used in fumigating dens of target animals; fladry/turbo fladry; and site access/increased presence.¹⁵⁰
 - We agree that all of these proposed activities may affect gray wolves in California and believe this is exactly why they should be addressed directly in the final EIR/EIS.
 - **In its assessment of the effects of the proposed action on gray wolf recovery, the BiOp found that some of the IWDM activities proposed by WS-CA could**

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¹⁴⁷ *Id.*

¹⁴⁸ BiOp at p. 5.

¹⁴⁹ BiOp at pp. 28-29.

¹⁵⁰ *Id.* at pp. 29-34.

adversely affect gray wolves.¹⁵¹ [Emphasis added.] Specifically, it found that “remotely deployed predator control devices such as snares, live-capture traps and quick-kill traps could potentially result in injury or death to gray wolves” but that rates of potential adverse effects, based on data from other states, would not result in impacts of the gray wolf in the lower 48 states.

- However, it is of concern to us that the BiOp did not assess the effects of these adverse effects on recovery of wolves in California. Further, as we discuss below, we disagree with the BiOp’s conclusion that activities such as ground shooting, aerial operations, use of trained dogs, and site access/increased human presence are not expected to result in adverse effects to gray wolves.¹⁵²
- In its assessment of cumulative effects, the BiOp noted that “*if wolves become more abundant in the area, there will be greater potential for some incidental and accidental trapping or snaring of wolves by private trappers, and some illegal shooting of individual wolves by people who either mistake the animal for a coyote or deliberately target it*” [Emphasis added] but concluded that at this point in time the actions are not reasonably certain to occur.¹⁵³
 - As described below, we disagree with the conclusion that the actions are not reasonably certain to occur.
- USFWS’s Determination that “the actions as proposed are not likely to jeopardize the continued existence of the gray wolf population.”¹⁵⁴
 - In our discussion below, we describe why, regardless of this determination in 2020, reinitiation of consultation between WS-CA and USFWS is necessary.
- An Incidental Take Statement (ITS). This statement describes measures which “*are non-discretionary and must be undertaken by WS-CA or become binding conditions of any agreement issued to contractors, operators, or permittees, as appropriate, for the [take] exemption in Section 7(o)(2) to apply.*”¹⁵⁵
 - The ITS estimates that during the five-year period covered by the 2020 Consultation, IWDWM activities implemented by WS-CA in the action area “*is anticipated to result in the serious injury or death of a total of three gray wolves.*”¹⁵⁶

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O4-109

¹⁵¹ *Id.* at pp. 34-35.

¹⁵² *Id.* at pp. 30, 32-33.

¹⁵³ *Id.* at p. 35.

¹⁵⁴ *Id.* at p. 36.

¹⁵⁵ *Id.* at p. 37.

¹⁵⁶ *Id.*

- o The ITS concludes that the effect of this level of take is not likely to jeopardize the continued existence of the gray wolf in the contiguous United States -- but fails to assess its effect on wolf recovery in California.
- o The ITS lists three non-discretionary Reasonable and Prudent Measures (RPMs) which are non-discretionary and lists 11 Terms and Conditions (TCs), which implement the RPMs. We have specific concerns regarding the following TCs:
 - TC 1.1 – TC 1.4 regard the use of live traps, quick-kill traps, and snares in occupied wolf range and areas of new wolf activity. However the TCs are inadequate to protect adult wolves, juvenile wolves or pups from harm or death due to traps or snares, for the following reasons:
 - No traps or snares should be permitted in occupied wolf range or in areas of new wolf activity. The BiOp and BA define “occupied wolf range”, for purposes of implementing minimization measures, as being only a “5-mile radius around all locations of gray wolves and wolf sign”, or only a “5-mile radius around radio locations of resident gray wolves” when fewer than 20 radio location are available, or only a “3-mile radius around convex polygons” developed from 20 or more radio locations of a pack, air or single wolf over a period of six months or more.¹⁵⁷ A 3 or 5 mile radius around known wolf locations as a buffer zone within which to implement RPMs and TCs is simply too small of an area to adequately protect wolves from risk of harm or death. To be a wolf means to be an animal which travels many miles daily; decades of research on wolf biology and ecology wherever the species lives confirm that, on average, a wolf may travel anywhere from one to 45 miles in a day.¹⁵⁸ One radio-collared Oregon wolf who came to California in late 2015-early 2016 but then returned to Oregon after about six weeks on one occasion traveled nearly 70 miles in a 24-hour period.¹⁵⁹ A 2017 paper reviewed wolf dispersal in 1,681 radio-collared wolves in the northern Rockies from 1993-2008 and among its findings concluded that dispersal is innate in sexually mature wolves and occurs throughout the year; that median dispersal distance ranged from 98.1 ± 99.9 km for males, 87.7 ± 101.9 km for females, and was longer for yearlings than for adults; and 10 wolves dispersed distances greater than 300

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¹⁵⁷ BiOp at p. 16; BA at p. 24.

¹⁵⁸ Mech, L.David, 1970. *The Wolf. The Ecology and Behavior of and Endangered Species*. University of Minnesota Press. 384 pp., at pp. 159-161.

¹⁵⁹ Personal communication, USFWS biologist John Stephenson, August 2020.

km.¹⁶⁰ Given this well-documented aspect of wolf behavior, it is simply a fact that an adult gray wolf, during breeding season, pup rearing or non-breeding season can easily travel 20 miles in a night and be back to the den or rendezvous site by the next morning if they do not befall misfortune and get caught in a trap or snare during their travels.¹⁶¹

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- TC 1.1. requires daily checks of live-traps, quick-kill traps, and snares, but this is insufficient. Periods of hot weather or cold weather, which expose wolves to heat stress and dehydration and/or freezing of limbs whose circulation is compromised from being held fast in a trap or snare necessitates that trap and/or snare checks be made multiple times each day. The bottom line, however, is these methods should not be used at all.
- TC 1.2 provides that no live-traps, quick-kill traps, or snares be used within 1 mile of occupied den sites, known active rendezvous sites, or areas of recently documented pup activity from June 1 to October 1 unless approved on a case-by-case basis by USFWS. A 1-mile buffer is insufficient as it runs counter to known, well-documented biological data on wolf behavior and ecology. While a 1-mile buffer has been used as the standard elsewhere, since the early days of wolf reintroduction/recovery efforts in the northern Rocky Mountains, given its complete lack of scientific foundation it seems more likely that the 1-mile radius designation was simply one of many attempts to minimize the influence of “land use restrictions” to minimize resistance to and any sense of inconvenience by wolf reintroductions. The fact is, as noted above, adult wolves travel many miles each day. Adults hunting for food to provision themselves or pups will range far beyond one mile and need to be able to safely return home unharmed and alive in order to feed their pups. And pups, which typically are born in early-to-mid April, generally are strong enough and sufficiently mobile to follow the adults for several miles by the time they reach three to four months of age.¹⁶² Thus from mid-July onward,

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¹⁶⁰ Jimenez, M.D., Bangs, E.E., Boyd, D.K., Becker, S.A., Ausband, D.E., Woodruff, S.P., Bradley, E.H., Holyan, J., and K. Laudon. 2017. Wolf dispersal in the Rocky Mountains, Western United States: 1993-2008. *J. of Wildlife Management* 81(4): 581-592.

¹⁶¹ Personal communication, retired USFWS Idaho Wolf Recovery Coordinator and USDA/WS Wolf Specialist Carter Niemeyer, March 2024.

¹⁶² Mech, L. David, and Luigi Boitani, Eds. 2003. *Wolves. Behavior, Ecology, and Conservation*. The University of Chicago Press. 448 pp., at p. 52.

- pups will be at risk from any traps or snares set beyond the prescribed 1-mile radius.
- TC 1.3 provides that snares used in occupied wolf range or areas of new wolf activity must have breakaway devices, and that neck snares without breakaway devices must not be used (and existing ones must be removed) within 3 miles of an area where monitoring information suggests wolves may be present. However, as noted above, the risk to adults or pups from snares is too great to allow their use at all in such areas.
 - Reinitiation – the BiOp notes that reinitiation of formal consultation is required where discretionary federal agency involvement or control over the action is retained and if (1) amount or extent of incidental take is exceeded; (2) new information reveals effects of agency action that may affect listed species or critical habitat in a manner or extent not considered in this opinion; (3) agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action.
 - As we describe in the following section, new information which meets reinitiation criterion (2) requires the reinitiation of formal consultation.
 - f. The Significant Increase in Both Wolf Numbers and Wolf Range in California Since the Consultation was Conducted in 2020 Requires Reinitiation of Consultation by WS-CA with USFWS.
 - USFWS’s Determination in its BiOp that “the actions as proposed are not likely to jeopardize the continued existence of the gray wolf population” relies on an outdated legal status assessment of the species, an outdated environmental baseline, and an outdated analysis of the effects of CA-WS’s proposed action:
 - **An outdated legal status assessment of the species** - The BiOp describes that gray wolves outside of the already-delisted Northern Rocky Mountains Distinct Population Segment (NRM DPS) are proposed for delisting due to recovery. Since this BiOp was completed gray wolves were federally delisted nearly nationwide but the delisting was overturned in federal court in 2022. The court concluded that the USFWS’ reliance on the status of wolves in the Western Great Lakes DPS to enact near-nationwide delisting failed to take into account the impacts to wolf recovery in other parts of the country (such as in California).¹⁶³

↑ O4-114
Cont.

O4-115

O4-116

O4-117

¹⁶³ *Depts. of Wildlife v. U.S. Fish & Wildlife Serv.*, 584 F. Supp. 3d 812 (N.D. Cal. 2022).

- o **An outdated environmental baseline** – The BiOp relies on the baseline of 2010-2019 used by WS-CA in its BA. At time of consultation in 2020, the confirmed California wolf population consisted solely of the Lassen pack, composed of six wolves. Since that time, reproduction by the Lassen pack has been confirmed annually, and six additional wolf packs have been confirmed in the state. Of these six additional packs, the Whaleback pack has reproduced annually since 2021 and the Yowlumni, Beyem Seyo, and Harvey packs all reproduced in 2023. In addition to the seven total packs, CDFW also has confirmed the presence of a group of two to three wolves which don't yet qualify as a pack, plus two individual wolves. At present, California has at least 45-50 wolves, many of which are juveniles/yearlings, and new pups will be born to most if not all of these packs this April.¹⁶⁴
- o **An outdated analysis of the effects of the action** – At the time the BiOp was prepared, California's sole known wolf pack occupied portions of Lassen and Plumas Counties. At present, California's wolf population ranges across far more terrain than was the case in 2020. Wolves now occupy portions of eight counties in California, placing them at risk in many additional parts of the landscape where WS-CA is conducting IWDM activities.¹⁶⁵

O4-118

O4-119

Reinitiation of formal consultation between CA-WS and USFWS is required, due to the existence of new information revealing the effects of agency action that may affect the listed species (gray wolf) in a manner or extent not considered in this opinion: Namely, California now has seven times as many packs, approximately eight times as many wolves, occupying four times as many counties as was the case when the BiOp was prepared in 2020. Thus all of the WS-CA IWDM activities aimed at predator control, especially for coyotes, now place at risk of harm or death an exponentially greater number of wolves, including pups; and any of the non-lethal methods employed by WS-CA for managing conflicts between livestock and wolves now places at risk of disturbance an exponentially greater number of wolves, including pups.

O4-120

The BiOp lists minimization methods aimed at reducing the potential for incidental take from CA-WS' IWDM activities.¹⁶⁶ But the new information we have described renders the USFWS BiOp Minimization Methods Inadequate. Methods contained in the BiOp were identified when California's wolf population consisted solely of one pack of six animals whose territory straddled portions of Lassen and Plumas counties. The state's wolf population currently is eight times larger and ranging across four times as many counties as when the BiOp was completed, and the methods described in 2020 cannot be expected to reliably protect California's current endangered

O4-121

¹⁶⁴ California Department of Fish and Wildlife Wolf Management Update November-December 2023, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=220053&inline>

¹⁶⁵ California Department of Fish and Wildlife Approximate Area of Gray Wolf Activity, January 2024, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=219800&inline>

¹⁶⁶ BiOp at pp. 23-25.

wolf population from incidental or accidental take. As described above, requiring implementation of minimization methods within only a 5-mile or 3-mile radius of known wolf locations is wholly insufficient since wolves, as part of their everyday biology and ecology travel much greater distances than this. And with the increase in pack numbers and annual reproduction and recruitment of pups, this means that within California counties of known wolf packs there also will exist an increasing number of lone dispersing wolves leaving their birthpacks to seek mates and territories of their own.

04-121
Cont.

Further, both the CA-WS BA and the USFWS BiOp fail to acknowledge that endangered wolves are at risk of harm or death from ground shooting or aerial gunning of coyotes, an IWDM activity that CA-WS clearly intends to continue conducting. It is not clear if the BiOp will allow night-shooting of coyotes in occupied wolf range or areas of new wolf activity. There is always the potential for mistaken identity shootings of wolves which a shooter believes to be coyotes and this potential is magnified if coyote shooting is allowed to take place at night when visibility and certainty of identification of the species are both lessened.

04-122

The new information – *i.e.*, the greatly increased number of adult wolves and pups plus the significant expansion of locations of wolf pack territories and areas of wolf activity within the state significantly increase the risk of harm or death to California’s wolves at both the ecoregion and county levels:

04-123

- o **At the Ecoregion Level:** In BTR Chapter 1 (“Introduction”), Table 1-2 lists the target species located within each of California’s eight ecoregions. In all eight ecoregions, coyotes are a target species. Thus in all eight ecoregions, any wolves present are at risk of harm or death from WDM activities aimed at coyotes.¹⁶⁷
- o **At the County Level:** In BTR Chapter 5 (“Summary of Wildlife Damage Management by County”), counties are listed and categorized according to whether they have cooperative service agreements (CSAs) with WS, or if they instead use county-directed programs, or if they are counties with no known government-provided WDM. Of the eight California counties where wolves are currently known to exist, wolf-occupied counties which have a CSA with WS include Siskiyou, Modoc, Lassen, Plumas, Sierra, Nevada, Tehama, and Tulare counties; no known wolves currently exist in any counties whose WDM activities are county-directed; and there are two counties with known wolves, Tehama and Tulare, which have no known government-provided WDM program. In the descriptions of each of these eight counties, coyotes are listed in tables which project county-program lethal take and cumulative lethal take of target mammal species under the proposed project (Table 5-25, Table 5-35, Table 5-41, Table 5-43, Table 5-57, Table 5-59, Table 5-111, and Table 5-113).¹⁶⁸ Thus in all eight counties, any wolves present are at risk of harm or death from WDM activities aimed at coyotes.

04-124

04-125

¹⁶⁷ BTR at pp. 7-8.

¹⁶⁸ *Id.* at pp. 356, 371, 380, 383, 404, 407, 487, 491.

g. Ground and Aerial Shooting of Coyotes, Especially at Night, and the Use of Lethal Traps and Snares for Coyotes and Other Target Species Should be Prohibited in Wolf Range in California.

Wolves are at heightened risk of harm or death when aerial or ground shooting of coyotes is allowed, especially if night-time shooting is allowed, and when the use of lethal traps or snares are allowed within wolf range, including if these actions are allowed as a part of CA-WS IWDM activities.

04-126

The gray wolf is protected by both the federal Endangered Species Act (“ESA”) and the California Endangered Species Act (“CESA”), yet few on-the-ground protections to the species have been provided since its return to California. In contrast, California’s two other CESA-listed canids, the San Joaquin kit fox (*Vulpes macrotis mutica*) and the Sierra Nevada red fox (*Vulpes vulpes necator*), are currently protected from inadvertent take by prohibitions on night-time hunting and the use of lethal traps within their range.¹⁶⁹ Read together with the statutory prohibitions on taking game mammals at night, these regulations collectively result in a complete ban on the use of lethal traps in the range of both the kit fox and red fox and a ban on the night-time hunting of any mammal in the range of the kit fox. Gray wolves should be afforded comparable protections as is currently provided to these two species, to minimize the likelihood of inadvertent take in violation of CESA and the ESA.

04-127

Both the endangered listing under CESA and ESA as well as the California Wolf Conservation Plan are important regulatory mechanisms to protecting the gray wolf in California, reflective of the legal and public mandate to preserve and recover gray wolves in the state. However, these regulatory instruments are limited because, while they prohibit the taking of wolves, they fail to protect the species from accidental killing and trapping intended for other target animals, such as coyotes, thereby posing a critical gap in wolf recovery efforts. Mistaken killings of non-target species pose an immediate risk to California’s handful of newly establishing wolf packs and to gray wolf recovery more generally. To mitigate these risks to wolf recovery in California and avoid violations of federal and state law, CA-WS should forgo any night-time shooting of coyotes and any use of lethal traps or snares in known wolf territory and new areas of wolf activity.

04-128

Overall, both daytime and night-time shooting of species, particularly in wolf territory, has resulted in innumerable cases in other states of the deaths of wolves and other non-target species. Hunting, particularly recreational coyote hunting, has led to several deaths of endangered wolves mistaken as coyotes. In its notice of findings for the gray wolf CESA listing, the California Fish and Game Commission confirmed that “*dispersing wolves and small wolf populations are inherently at risk due to . . . being killed by hunters that mistake them for coyotes*” and “[*Department staff*] have been fearful that . . . unknown wolves that could be in California

04-129

¹⁶⁹ See 14 CCR § 465.5(g)(5)(c), 466 and 474(a).

would be mistaken for a coyote and shot or harmed.”¹⁷⁰ Such risks have been substantiated in other states. In October 2015, an Oregonian coyote hunter shot a radio-collared wolf which he claimed to have mistaken for a coyote; though he was charged and convicted of killing a state-listed endangered species, this prosecution will not restore the wolf to life.¹⁷¹ In December 2014, the first gray wolf spotted in the Grand Canyon in over 70 years, affectionately named Echo by schoolchildren three months prior to her death, was shot dead by a hunter in southern Utah who mistook Echo for a coyote.¹⁷² **Similarly, in January 2013, a highly endangered Mexican wolf, one of fewer than 100 roaming the southwest after an expensive reintroduction program, was killed in southwestern New Mexico by a U.S. Wildlife Services officer who again mistook the animal for a coyote.**¹⁷³ [Emphasis added.] These deaths follow a string of accidental wolf killings in recent years: gray wolves have been shot mistakenly as coyotes in Iowa in four separate instances in 2014 and 2016; in Missouri in 2001, 2010 and 2012; and in Illinois in separate incidents in 2002, 2008, and 2011.¹⁷⁴ Wolves also have been shot by hunters mistakenly thinking them to be coyotes in states in the northeastern U.S., including in Maine, Vermont, Massachusetts and New York, with the most recent known New York shooting taking place in late 2021.¹⁷⁵

In addition to these breaking headlines, state and federal officials have reported wolves being shot mistakenly as coyotes in all parts of the country where wolves are returning. A 2014 report, prepared by the Center for Biological Diversity, tabulated known dispersals of wolves from gray wolf federal recovery areas in the Western Great Lakes states and northern Rockies to adjacent

¹⁷⁰ California Fish and Game Commission, Notice of Finding and Notice of Proposed Rulemaking Gray Wolf, 2014, provisions 11 and 14, https://biologicaldiversity.org/campaigns/wolves_on_the_west_coast/pdfs/Pages-from-CRNR-10-31-2014-CFEC-wolf-CESA-finding.pdf

¹⁷¹ *Coyote hunter pleads guilty of violation in wolf shooting*. (Feb. 5, 2016), https://www.bluemountaineagle.com/news/coyote-hunter-pleads-guilty-of-violation-in-wolf-shooting/article_7a10224b-92e9-5abe-9658-adb4d11435bd.html

¹⁷² Ari Phillips, *First Gray Wolf Spotted at Grand Canyon In 70 Years Shot Dead by Hunter* (Feb. 12, 2015, 2:59 pm), <http://thinkprogress.org/climate/2015/02/12/3622423/famous-grand-canyon-gray-wolf-shot-by-hunter/>; See also Brett Prettyman, *Coyote hunter kills a wolf by mistake near Beaver* (Dec. 29, 2014, 1:00 pm), <http://www.sltrib.com/news/1999741-155/utah-hunter-kills-wolf-near-beaver>

¹⁷³ Chris Clarke, *Is it time to end coyote hunting in California?* (Jan. 5, 2015, 2:14 pm), <https://www.pbssocal.org/define/is-it-time-to-end-coyote-hunting-in-california>

¹⁷⁴ Hance, Jeremy (May 12, 2014) Grey wolf appears in Iowa for first time in 89 years – and is shot dead, <https://www.theguardian.com/environment/2014/may/12/grey-wolf-iowa-shot-dead>; Love, Orlan (July 17, 2014) Another wolf slain in Iowa, <https://www.thegazette.com/environment-nature/another-wolf-slain-in-iowa/> BMTN Staff (March 4, 2016) 2 gray wolves found dead in Iowa after being mistaken for coyotes, <https://bringmethenews.com/minnesota-sports/2-gray-wolves-found-dead-in-iowa-after-being-mistaken-for-coyotes>; KMZU Staff (March 21, 2013) Hunter shot wolf, not coyote, https://www.kmzu.com/news/local/hunter-shot-wolf-not-coyote/article_724d787f-70f9-5561-a47e-5b33959a62f6.html; Associated Press (Jan 1, 2014) Wolves confirmed in Illinois https://thesouthern.com/news/local/state-and-regional/wolves-confirmed-in-illinois/article_fe563838-7332-11e3-88ca-0019bb2963f4.html

¹⁷⁵ Maine Wolf Coalition, *Wolves in the Northeast*, <https://mainewolfcoalition.org/wolves-in-the-northeast/>; Center for Biological Diversity (July 26, 2022) DNA Test Confirms Another Wolf Shot in New York, https://biologicaldiversity.org/w/news/press-releases/dna-test-confirms-another-wolf-killed-in-new-york-2022-07-26/?_gl=1*1zyzfz*_gl*_NTcxMjM5MDA0LjE3MDYzMDcxOTY

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04-130

states over a 33-year period from 1981-2014, and the outcome of those dispersal events.¹⁷⁶ Of 56 known dispersals, in 48 instances the wolves were later found killed or dead of unknown causes. Of those 48 instances, in 36 cases the wolves were found shot and killed, and in 11 of those cases, agency reports noted that the shooter mistook the animal for a coyote.¹⁷⁷

04-130
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As the accidental killings of wolves mistaken for coyotes in daytime are well-documented, night-time conditions only serve to exacerbate the risk of mistaken wolf taking in potential wolf territory where night-time hunting is permitted. Exemplifying such risk, North Carolina's red wolf population suffered the loss of five wolves in 2012; they were shot by coyote hunters engaging in spotlighting, which compelled a state court to ban night-time spotlight hunting of coyotes entirely in order to protect the imperiled 100 red wolves there.¹⁷⁸

04-131

Further, numerous examples abound of other non-target victims of night-time coyote shooting, demonstrating the significant risk such activity poses to wolf recovery. Such mistaken-identity night-time killings include species that look nothing like the target species, including humans. Exemplifying this in California in 2014, Department Warden Bob Perra suffered near-fatal neck injuries from night-time shots taken by a contestant of a coyote-killing contest in El Dorado County.¹⁷⁹ Other human victims of night-time coyote hunting include seventeen year-old Devin Dourin of Michigan, who was killed by a hunter firing immediately at Dourin when observing movement in the brush at the base of a tree.¹⁸⁰ Twenty-eight year old Trenton Sutherland of Colorado, a coyote hunter himself, was shot dead by his two hunting companions, who mistook his eyes for those of a coyote when engaging in coyote night-hunting.¹⁸¹ U.S. Forest Service ranger Christopher Upton of Georgia was brutally killed with eleven shots by a coyote hunter wielding a high-powered rifle with night-vision equipment; the killer said that he mistook

04-132

¹⁷⁶ Weiss et al., Center for Biological Diversity, Making Room for Wolf Recovery: The Case for Maintaining Endangered Species Act Protections for America's Wolves (2014), available at http://www.biologicaldiversity.org/campaigns/gray_wolves/pdfs/Making_Room_for_Recovery_print.pdf.

¹⁷⁷ *Id.* at 5-6; Appendix D at 19-25.

¹⁷⁸ Brian North, *Fourth red wolf killing prompts hunting change* (Nov. 21, 2012, 8:25 pm),

<https://wcti12.com/amp/archive/fourth-red-wolf-killing-prompts-hunting-change>.

¹⁷⁹ Locke, Cathy, *El Dorado County man charged in 2014 wounding of game warden* (Feb. 25, 2015),

<http://www.sacbee.com/news/local/crime/article11171996.html>.

¹⁸⁰ Roger Weber, *Michigan teen dies in apparent hunting accident in Brockway Township* (Sep. 21, 2012, 10:08 am),

<http://www.clickondetroit.com/news/Michigan-teen-dies-in-apparent-hunting-accident-in-Brockway-Township/16688822>.

¹⁸¹ *Man shot and killed after being mistaken for coyote* (Jan. 5, 2014, 7:24 pm),

<http://kdvr.com/2014/01/05/man-shot-and-killed-after-being-mistaken-for-coyote/#comment-48689>. See also *Man killed in hunting accident* (Jan. 5, 2014, 10:15 am),

<http://www.kktv.com/news/headlines/Man-Killed-In-Hunting-Accident-238774501.html>; Associated Press, *Man*

killed in hunting accident in SW Colorado (Jan. 4, 2014, 2:49 pm),

https://gazette.com/news/man-killed-in-hunting-accident-in-sw-colorado/article_5f090289-3d87-5ca3-a24f-0c9670869ae6.html.

Upton's eyes, looking out from binoculars, as those of a coyote.¹⁸² Such tragedies highlight that even hunters equipped with high-tech equipment fail to differentiate a human from a coyote. It is clear that if coyote shooters cannot adequately differentiate humans from target species at night, wolves face a great risk of accidental targeting.

04-132
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In addition to mistaken human killings during night-time hunting, there is strong anecdotal evidence about mistaken nocturnal shootings of other non-target species, further heightening the case for protections in wolf territory. One example is of a Nevada deaf dog who was run over numerous times by a police officer who believed it was a coyote in the evening time.¹⁸³ Similar incidents have been reported around the country, such as local newspaper accounts from Maine, Michigan, and Pennsylvania.¹⁸⁴

04-133

As demonstrated by the examples we've provided, accidental shootings of wolves and other wildlife is a relatively common occurrence by people intending to shoot coyotes, with the risks greatly exacerbated at night. Further, the instances we describe here are only the ones that agencies know about. It is highly likely far more dispersing wolves have been mistaken for coyotes and killed than have been reported or discovered.¹⁸⁵ While many of these incidents were from private hunters, not state/federal agents, the risk remains when shooting at night because of poor visibility, even if the shooter is trained to distinguish wolves from coyotes.

04-134

Additionally, the use of lethal traps and snares in areas of potential wolf territory also poses the risk of non-target harm or killing of wolves. While the likelihood of shooting accidents can theoretically be reduced by responsible individuals exercising good judgment, traps and snares catch, kill and maim non-target animals without the opportunity for human judgment. Where there is overlap of wolves with traps or snares, wolves will almost inevitably be captured by the devices. For example, in Utah, a gray wolf perished in a neck snare set for coyotes.¹⁸⁶ A study

¹⁸² Rob Pavey, *Forest officer's death investigated after shooter says he mistook man for coyote* (Mar. 8, 2010), <https://www.augustachronicle.com/story/news/2010/03/09/forest-officers-death-investigated-after-shooter-says-he-mistook-man-coyote/14610934007/>.

¹⁸³ John Edwards, *Collingwood police confirm it was dog, not coyote run over by OPP cruiser three times* (Oct. 21, 2015), <http://www.simcoe.com/news-story/5970394-collingwood-police-confirm-it-was-dog-not-coyote-run-over-by-opp-cruiser-three-times/>.

¹⁸⁴ See, e.g., <http://bangordailynews.com/2011/12/30/news/portland/family-dog-mistaken-for-coyote-shot-and-killed-by-hunter/>; <http://huppermichiganssource.com/news/local/purebred-dog-shot-and-killed-mistaken-for-coyote/>; <http://wnep.com/2015/01/12/looking-for-answers-after-family-dog-shot-dead/>.

¹⁸⁵ Illegal killing of wolves occurs for a number of reasons. One of the chief reasons is accidental killings, either through mistaken identity or when caught in traps set for other species. 76 Fed. Reg. at 26117. It is likely that most illegal killings intentional or not, are never reported to government authorities. *Id.* Because the killings generally occur in remote locations and the evidence is easily concealed, there are no reliable estimates of illegal killings of gray wolves. *Id.*

¹⁸⁶ Maffly, Brian, *Utah's war on coyotes claims another wolf I* (Nov. 30, 2015, 2:40 pm), <https://www.slttrib.com/news/environment/2015/11/27/utahs-war-on-coyotes-claims-another-wolf/>.

04-135

by the U.S. Geological Survey found that thirteen highly endangered Mexican wolves were accidentally trapped by trappers targeting other species, with seven of those animals suffering injuries.¹⁸⁷ The Oregon Department of Fish and Wildlife in late 2015 similarly reported that, in Oregon, at least four wolves had been incidentally captured in traps set by recreational trappers seeking species other than wolves.¹⁸⁸ **More recently, an Oregon wolf was accidentally trapped in winter of 2021 by WS's Oregon field staff who were trapping for coyotes in Deschutes County.**¹⁸⁹ [Emphasis added.] After being radio-collared and released, the wolf exhibited a severe paw injury likely caused by the trap. He dispersed to California, where his foot injury greatly hampered his ability to hunt wild prey and he instead preyed on a number of livestock, which are much easier to hunt. Upon returning to Oregon in summer of 2022, this wolf was implicated in more livestock predations over the next few months and that fall he was illegally killed.¹⁹⁰ In February of 2022, a wolf was caught in a trap set for coyotes in Fort McCoy, Wisconsin.¹⁹¹

O4-135
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Clearly, prohibiting -- not merely restricting with minimization measures -- the use of lethal traps and snares in the range of the wolf in California is essential to prevent such from occurring here.

O4-136

In summary, there currently are no limits to night-time hunting of furbearers or nongame mammals, including coyotes, within much of the range of the gray wolf in California. California classifies coyotes as nongame mammals. FGC § 4150. Coyotes may be taken at any time of the year with no bag limits. 14 CCR § 472(a). Consequently, night-time hunting of coyotes is legal except in the area designated for the protection of the endangered San Joaquin kit fox. 14 CCR § 474(a). Coyote shooting, including night-time hunting, is common and widespread within the range of the gray wolf in California and therefore presents a significant threat to both individual wolves as well as to the establishment and recovery of the species. This is true whether the shooting is conducted by private citizens who are hunting recreationally or by field staff from CA-WS, wildlife damage management staff employed by counties, or private individuals hired by counties or private citizens. Similarly, geographic restrictions on the use of lethal traps that

O4-137

¹⁸⁷Turnbull, T.T., Cain, J.W., III, and Roemer, G.W., 2011, Evaluating trapping techniques to reduce potential for injury to Mexican wolves: U.S. Geological Survey Open-File Report 2011-1190, 11, available at: <http://pubs.usgs.gov/of/2011/1190/>.

¹⁸⁸ Oregon Department of Fish and Wildlife, Updated biological status review for the Gray Wolf (*Canis lupus*) in Oregon and evaluation of criteria to remove the Gray Wolf from the list of Endangered Species under the Oregon Endangered Species Act (Nov 9, 2015), available at: https://www.dfw.state.or.us/agency/commission/minutes/15/11_november/Exhibit%20B_Science%20Review_11-6-15.pdf.

¹⁸⁹ Confirmed via personal communication with Oregon Department of Fish and Wildlife wolf biologist Roblyn Brown.

¹⁹⁰ <https://biologicaldiversity.org/w/news/press-releases/15000-reward-offered-for-info-on-oregon-wolf-killed-illegally-in-late-2022-2023-01-10/#~:text=The%20federally%20protected%20Oregon%20wolf,likely%20caused%20by%20the%20trap.>

¹⁹¹ Sturkol, Scott, *Wolf rescued from coyote trap at Fort McCoy, then collared for satellite tracking* (Feb. 25, 2022), <https://www.dvidshub.net/news/415336/wolf-rescued-coyote-trap-fort-mccoy-then-collared-satellite-tracking>

were imposed to protect California's two other endangered canids are not applicable within much of the current known and probable range of wolves in the state. Gray wolves need, are legally-entitled to, and consequently must be afforded the same protections the San Joaquin kit fox and Sierra Nevada red fox currently receive. Night-time shooting of coyotes and the use of lethal traps and snares by staff who work for WS-CA, county governments or as private contractors should be prohibited within the gray wolf's known and projected range.

O4-137
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- h. The Presence in California of Wolves -- a State-and-Federally Listed Endangered Species -- and Current Best Available Science Demonstrating the Effectiveness of Non-Lethal Conflict Deterrence Methods and Tools, Require that the Draft EIR/EIS Proposed Action and Alternatives Include a Through Discussion of How WS-CA, CDFA, and Partnering Counties Will Engage Local Communities in Wolf Range in the Implementation of Proactive, Non-Lethal Conflict Preventatives.

O4-138

Promoting coexistence between livestock operators and wolves is of critical importance for successful wolf recovery in California. Despite a growing population of wolves establishing territories in an increasing number of counties, the Draft EIR/EIS lacks any section devoted to this critical issue.

The use of nonlethal management tools to reduce wolf-livestock conflicts is the key to successful coexistence between livestock owners, rural communities and wolves, and to the success of state and federal agencies in California in ensuring wolf recovery here.

O4-139

In order to have an effective nonlethal IWDM effort, more than a description of the tools is needed. The livestock-raising community will need help to both learn how to use the tools effectively and to properly implement their use on the ground. Success is more than just knowing and having the tools. Success will come through understanding, education, training, local on-the-ground assistance, and local, state and federal level support. The BiOp prepared by USFWS includes in its recommended conservation measures encouraging and aiding livestock operators in using non-lethal techniques to prevent predations by wolves.¹⁹² We cannot emphasize strongly enough the need for WS-CA to fully act on this recommendation.

O4-140

Recently, the California Department of Fish and Wildlife launched a three-year pilot program funded by the state legislature aimed at helping livestock owners to coexist with wolves through three avenues: (1) Monetary compensation for direct losses due to wolves (compensating at full fair market value for livestock injuries and deaths which the agency has deemed a confirmed or probable wolf-caused loss); (2) Monetary reimbursement of expenses incurred by livestock owners to implement non-lethal, proactive, livestock-wolf conflict prevention methods and tools; and (3) Pay for Presence (providing a payment constituting a percentage of the value per head of

O4-141

¹⁹² BiOp at p. 41.

livestock grazing in wolf territory as means to compensate livestock owners for potential stress to livestock due to wolf presence).¹⁹³ The money was allocated by the legislature in 2021 and as of the start of 2024, the Department announced that it had received more than 100 claims and that the fund would likely soon be exhausted. The state wildlife agency, livestock associations and conservation groups would like to see the program continued with a new funding stream approved, along with a review of the pilot program and consequent report evaluating whether the program was effective, successful and/or needs any modifications to improve its effectiveness and accountability.

O4-141
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Given the voluminous published scientific literature describing the effectiveness of non-lethal methods and tools to prevent livestock-wolf conflicts (as detailed elsewhere in this comment letter), and the popularity of this pilot program launched by the state wildlife agency, it is incumbent upon WS-CA to launch its own campaign to educate and assist livestock owners and other living in rural communities where wolves may be present or soon returning to, on the use of non-lethal, proactive livestock predation deterrence activities, methods, tools, and strategies.

O4-142

P. Conclusion

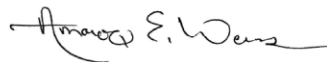
In conclusion, we appreciate the incorporation of non-lethal alternatives as provided for in the draft EIR/EIS, including some of the requests made by our group in our scoping comments. However, the draft EIR/EIS is fundamentally biased toward a lethal WDM response protocol, despite the effectiveness of non-lethal, and public opposition to lethal WDM activities. The current proposed project selected in the draft EIR/EIS provides for the continuance of a lethal WDM approach that is not based on public consensus and the best available science. The current proposed project also fails to adequately analyze adverse impacts to California's current population of state-and-federally endangered wolves, thus requiring reinitiation of Section 7 consultation with US Fish and Wildlife Service. Thank you for considering these comments.

O4-143

Respectfully submitted,



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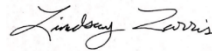
¹⁹³ CDFW Wolf Livestock Compensation Grants, <https://wildlife.ca.gov/Conservation/Mammals/Gray-Wolf/Grants>



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Wally Sykes
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Joshua Rosenau
Director of Policy & Advocacy
Mountain Lion Foundation



Matthew Simmons
Climate Attorney
Environmental Protection Information
Center

Attachments

1. Wolf Management Update from the California Department of Fish and Wildlife (November – December 2023)
2. Approximate Area of Gray Wolf Activity, California Department of Fish and Wildlife, January 2024

**Wolf Management Update
California Department of Fish and Wildlife
November – December 2023**

Field Work

Packs¹

Beckwourth pack (Plumas County)

Status: There was a minimum of two wolves in the Beckwourth pack. There were four detections of two separate wolves, one black and one gray, confirmed in the reporting period. The area continues to be monitored.

Collared wolves: None

Depredation Events: There were no depredation investigations during the reporting period.

Beyem Seyo pack (Plumas County)

Status: There was a minimum of eight wolves in the Beyem Seyo pack. The pack consists of the breeding wolves LAS23F & LAS19M, and six pups.

Collared wolves: The breeding female (LAS23F)

Depredation Events: There were no depredation investigations during the reporting period.

Harvey pack (Lassen County)

Status: There was a minimum of three wolves in the Harvey Pack, including the breeding wolves WHA05F & HAR01M and one pup.

Collared wolves: The breeding female (WHA05F)

Depredation Events: There was one confirmed depredation during the reporting period.

¹ California's 2016 Conservation Plan for Gray Wolves defines a wolf pack as "two or more wolves traveling together and using a definable area". CDFW recognizes wolf groups as packs when it either 1) detects multiple wolves and evidence of reproduction, or 2) detects two or more wolves four or more times within a geographically congruent area within a six-month period.

Lassen pack (Plumas and Lassen counties)

Status: There was a minimum of 10 wolves in the Lassen Pack, including the breeding wolves LAS09F and LAS16M, five yearlings, and three pups.

Collared wolves: A yearling female (LAS32F). However, the collar began to function irregularly during the reporting period.

Depredation Events: There were no depredation investigations during the reporting period.

Whaleback pack (Siskiyou County)

Status: There was a minimum of 11 wolves in the Whaleback Pack including the breeding wolves OR85 & WHA01F, one yearling, and eight pups.

Collared wolves: The breeding male (OR85)

Depredation Events: There were seven confirmed depredations during the reporting period.

Yowlumni pack (Tulare County)

Status: There was minimum of eight wolves in the Yowlumni pack including the breeding wolves YOW01F & LAS24M, and six pups.

Collared wolves: YOW01F was captured and collared during the reporting period.

Depredation Events: There were no depredation investigations during the reporting period.

Unnamed pack (Sierra and Nevada county)

Status: There was a minimum of two wolves documented, traveling together in an area spanning portions of Sierra and Nevada counties.

Collared wolves: None

Depredation Events: There were no depredation investigations during the reporting period.

Areas of Wolf Activity²

Modoc County – Oregon Department of Fish and Wildlife (ODFW) has documented two wolves near the California state line, western Modoc County. This area is being monitored by CDFW and ODFW.

Tehama County – In eastern Tehama County, camera traps detected three wolves in March and two wolves in April 2023. This area continues to be monitored.

Dispersing wolves

There have been no new dispersing wolves detected during this period. However, it is likely that an unknown number of uncollared dispersers exist in the state at any moment in time. CDFW has regularly detected dispersing wolves in California since December 2011. More information about these and other wolves can be found on CDFW's gray wolf web page in a document called "California's Known Wolves – Past and Present."

CDFW continues to receive and investigate reports of wolf presence from many parts of California. Public reports are an important tool for us. Please report wolves or wolf sign on the CDFW Gray Wolf web page: www.wildlife.ca.gov/Conservation/Mammals/Gray-Wolf/Sighting-Report.

Survey for presence (areas of suspected wolf presence)

CDFW continues to survey for the presence of uncollared and collared animals, based on wolf sighting reports and other sign of wolf activity (e.g., suspected depredation, DNA, tracks). Survey areas include the AWAs mentioned above in Modoc and Tehama counties as well as additional areas of suspected wolf presence in Lassen and Plumas counties.

² When two or more wolves are detected at one or more locations outside of a known pack area but one of the pack criteria is not met (see footnote 1 for criteria), an area encompassing the detections will be identified as an Area of Wolf Activity. AWAs will be prioritized for additional survey and will be recognized as packs if a pack criterion is met.

Livestock Interactions

Depredation Investigations

Month	Number of Investigations	Total Probable Wolf	Total Confirmed Wolf
November	11	0	4
December	9	0	4
Total	20	0	8

Date	Determination	Type	Wolf Pack Area	County	Investigators
11/05/2023	Confirmed	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/07/2023	Non-Depredation	1 Cow	Whaleback	Siskiyou	Siskiyou Co.
11/08/2023	Confirmed	1 Cow	Whaleback	Siskiyou	Siskiyou Co
11/12/2023	Confirmed	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/18/2023	Confirmed	1 Cow, 2 Calves	Whaleback	Siskiyou	Siskiyou Co
11/20/2023	Non-Wolf Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/23/2023	Unknown	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/25/2023	Non-Wolf Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/27/2023	Unknown	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/28/2023	Unknown	1 Calf	Whaleback	Siskiyou	Siskiyou Co
11/29/2023	Non-Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
12/07/2023	Non-Wolf Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
12/10/2023	Non-Depredation	1 Cow	Whaleback	Siskiyou	Siskiyou Co
12/16/2023	Confirmed	1 Yearling	Whaleback	Siskiyou	Siskiyou Co
12/17/2023	Non-Wolf Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
12/26/2023	Non-Wolf Depredation	1 Calf	Whaleback	Siskiyou	Siskiyou Co
12/28/2023	Non-Depredation	1 Cow	Whaleback	Siskiyou	Siskiyou Co
12/28/2023	Confirmed	1 Yearling	Harvey	Lassen	USDA - Wildlife Services
12/30/2023	Confirmed	1 Calf	Whaleback	Siskiyou	Siskiyou Co
12/31/2023	Confirmed	2 Calves (confirmed) 1 Calf (unknown)	Whaleback	Siskiyou	Siskiyou Co

Communication

CDFW biologists have been in regular communication and coordination with livestock producers, USDA Wildlife Services, county agriculture departments, private timberland managers, U.S. Fish and Wildlife, CDFW wardens, U.S. Forest Service, and conservation organizations.

Ongoing communication also occurs in counties with any known dispersing wolves. This includes county Boards of Supervisors, agricultural commissioners, farm services advisors, local Cattlemen's, and Farm Bureau boards.

Agency and community engagement events:

Nothing to report for this period.

APPROXIMATE AREA OF GRAY WOLF ACTIVITY

California Department of Fish and Wildlife
January 2024

This map displays the approximate boundaries of known resident California wolf pack territories based on the best available data (e.g., GPS collar locations, trail camera images, tracks, and confirmed sightings). Areas of Wolf Activity are the approximate locations where two or more wolves have been detected but reproduction or persistent use of a specific area has not yet been documented. The locations of dispersing wolves are not included, as dispersing wolves travel widely and their movements are unpredictable. This map will be updated quarterly.

 Pack Territory  Area of Wolf Activity 0 25 50 100 Miles



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Response to Comment Letter O4

Center for Biological Diversity; Project Coyote; Animal Welfare Institute; Endangered Species Coalition; WildEarth Guardians; Kettle Range Conservation Group; Western Watersheds Project; Wildlands Network; Northeast Oregon Ecosystems; Mountain Lion Foundation; Environmental Protection Information Center
 Renee Seacor, JD; Amaroq Wiess, MS, JD; Johanna Hamburger; Francisco J. Santiago-Ávila, PhD; Tara Thorton; Lindsay Larris; Timothy Coleman; Laura Cunningham; Damon Yeh; Wally Sykes; Joshua Rosenau; Matthew Simmons
 March 12, 2024

04-1 through 04-9 Thank you for the background information and introductory comments. The comments do not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comments are noted for the record and no further response is required.

04-10 through 04-17 Commenter claims that the EIR/EIS fails to properly consider the impacts of conducting WDM in Wilderness Areas (WAs). It is understood that some individuals will not agree with the use of WDM in special management areas, such as WAs and Wilderness Study Areas. The Congressional Grazing Guidelines emphasize that congressional intent related to grazing activities in wilderness is that “the general rule of thumb on grazing management in wilderness should be that activities or facilities established prior to the date of an area’s designation as wilderness should be allowed to remain in place and may be replaced when necessary for the permittee to properly administer the grazing program” (HR 2570).

The proposed WDM activities are consistent with the Wilderness Act. The Act permits the continuance of grazing operations in wilderness areas, and WDM is integral to a livestock operation in areas where predating animals exist. The assertion that lethal removal of predators violates the Wilderness Act’s mandate to manage Wilderness “so as to preserve its natural conditions” is incorrect. The assertion that lethal WDM is an impermissible “commercial enterprise” within WAs is also incorrect. “Commercial enterprise” is generally interpreted to mean business activities conducted for profit, including commercial resource development otherwise typical in some public lands, such as timber harvesting. At no point are WS-California or CDFA engaging in explicit commercial activity. WS-California and CDFA are not gaining through the sale of a for-profit product or providing a for-profit service for the generation of funds or revenue. Instead, they are providing otherwise permissible, under State wildlife law, logistical and educational support to those engaged in expressly permitted grazing operations. The States have broad trustee and police powers to manage wild animals within their jurisdictions, and the Wilderness Act does not alter that management authority. The CDFA, WS-California, or county wildlife specialists only provide WDM in WAs and other Special Designation Areas upon request and in coordination with the land manager. All WDM activities would be conducted in compliance with all applicable laws. The analysis in Section 4.2.2.4.1 and Section 5.6 of the EIR/EIS shows that WDM in WAs or other Special Designation Areas would not result in significant impacts.

The commenter’s claim that the EIR/EIS fails to consider U.S. Forest Service and Bureau of Land Management wilderness manuals and guidance documents is incorrect. Coordination with land management policies and plans is discussed in Section 4.2.2.4.1 of the EIR/EIS.

04-18, 04-19, 04-20 Commenter claims that the EIR/EIS fails to properly consider and analyze the effect on public safety (40 CFR 1508.27[b][2]). Commenter states that the EIR/EIS fails to consider psychological impacts of WDM on recreationists and the potential loss of companion animals to lethal

traps. The impacts of WDM on companion animals are examined in Section 4.2.5 of the EIR/EIS. The psychological impacts of WDM on recreationists are discussed in Section 4.3.8 of the EIR/EIS.

The commenter's claim that WDM implemented by WS-California recklessly kills dogs is not supported by the evidence. During the analysis period (calendar years 2010–2019), the average non-target capture rate during WDM activities included 0.3 feral dogs and 0.8 feral cats annually. All non-target feral dogs and cats captured during the analysis period were released unharmed (see Section 4.2.5.3.1 of the EIR/EIS or Section 4.1 of the BTR).

04-21 Commenter claims that the EIR/EIS does not contain a cost-benefit analysis in violation of NEPA. NEPA does not require agencies to conduct an economic analysis or disclose financial information in EISs. See 40 CFR 1502.23. Moreover, under 40 CFR 1502.23 of CEQ's regulations, "[f]or purposes of complying with the [NEPA], the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. Environmental effects were considered, including those that impact economic resources. WS-California determined that a detailed cost-benefit analysis was unnecessary and furthermore determined that there are important qualitative values relevant and important to its decision-making that cannot be readily monetized. These values include recreational, aesthetic, safety, ecological, and spiritual benefits. For these reasons, it was determined that a formal cost-benefit analysis would not contribute substantively to decision-making (i.e., it would not assist in making a choice among environmentally different alternatives) and it was decided to address these issues qualitatively.

04-22 The comment claims that the EIR/EIS fails to take a hard look at the humaneness of WDM. Please refer to Section 1.2.10, Humaneness, of this document. Please also refer to Responses to Comments 04-23 through 04-60.

04-23 through 04-27 Commenter claims that the EIR/EIS fails to adequately assess the humaneness of neck snares. Commenter states that Proulx et al. (2015) documented significant welfare concerns associated with the use of neck snares. Proulx et al. (2015) concluded that manual and powered killing neck snares used in Canada did not meet the Agreement on International Humane Trapping Standards. The United States does not follow the Agreement on International Humane Trapping Standards, which is an agreement between Canada and the European Union. In the United States, the Association of Fish and Wildlife Agencies published Best Practices for Trapping and the American Veterinary Medical Association supports the use of trapping in wildlife management (AVMA 2008). The topic of humaneness as it relates to WDM activities is an important but very complex point that has many interpretations. These topics were included in the analysis because they are a social issue of important public concern. The science of wildlife biology and management, including integrated WDM and wildlife research, often involves a full suite of activities. WS-California, the CDFA, and county personnel strive to undertake these activities as ethically and humanely as possible. Please refer to Section 5.5, Humaneness and Ethics, of the EIR/EIS for detailed discussion on humaneness and Section 4.2.5.4 of the EIR/EIS for detailed analysis of capture devices.

Numerous studies about method efficacy, trap selection, and humaneness identify the skills of the individual conducting the damage management as a crucial component in improving the result of the method. Wildlife Services reviews the use, risk, and humaneness associated with cable restraints (e.g., snares) in a 2019 peer-reviewed risk assessment. The CDFA, WS-California, and county wildlife specialist personnel are well trained and adhere to best management practices (BMPs) as feasible and

Wildlife Services Directives as appropriate to be as humane as possible and reduce non-target capture. Non-target take is discussed in detail in Chapter 4 of the BTR, which states that WS-California lethally takes an average of only 7.5 non-target animals per year.

04-28 through 04-43 Commenter claims that the EIR/EIS fails to adequately assess the humaneness of foothold traps. Commenter asserts that WS-California circumvents California Fish and Game Code Section 3003.1(a)(3), which prohibits the use of padded-jaw leghold traps in California, citing *Nat. Audubon Society v. Davis*, 144 F. Supp. 2d 1160 (N.D. Cal. 2000). In *Nat. Audubon Society v. Davis*, 144 F. Supp. 2d 1160 (N.D. Cal. 2000), the U.S. District Court for the Northern District of California held that Section 3003.1(c) of the California Fish and Game Code, which generally prohibits the use of any steel-jawed leghold trap except when necessary to protect human health or safety, did not apply to federal agencies engaged in wildlife management on federal lands or in conservation efforts under federal law, including the protection of T&E species. The CDFA and county wildlife specialists may also use foothold traps for public safety (*Nat. Audubon Society, Inc. v. Davis* [2002] 307 F.3d 835). As described in Appendix C-1 to the EIR/EIS, padded-jaw foothold traps are used by WS-California only in protection of public safety and T&E species. It is not uncommon for newly established laws and regulations to be legally challenged and then interpreted by the court system. WS-California uses padded-jaw foothold traps in accordance with the court's direction and all other applicable laws. A legal discussion regarding the appropriate interpretation of any specific court ruling or its scope is beyond the scope of this EIR/EIS.

Commenter cites Andreasen et al. (2018) to support the assertion that foothold traps pose a significant risk to non-target populations. Andreasen et al. (2018) examined cause-specific mortality in mountain lions in Nevada and suggested that capture in non-target foothold traps decreases survival of adult female mountain lions. However, the foothold traps that captured non-target mountain lions in Nevada were set by private trappers during legal trapping seasons. During the analysis period (calendar years 2010–2019), no non-target mountain lions were captured by WS-California traps. This supports the assertion throughout the EIR/EIS that wildlife specialist personnel's training and expertise contribute to the selectiveness and effectiveness of WDM traps.

Commenter requests that the EIR/EIS include which traps, trap accessories, and trap set requirements are used for each mammal species. The CDFA and WS-California cannot provide such detailed information because traps are selected based on several factors that can only be identified at the time of the request, such as previous WDM implemented and the effectiveness of that WDM; federal, state, county, and local rules and regulations; the urgency of the request; time of the year; the operational use of the property; and many others. As explained in Section 3.8.1 and demonstrated in Figure 2-3 of the EIR/EIS, wildlife specialists use a decision process (e.g., APHIS-WS Decision Model) to evaluate the unique conditions of each wildlife conflict to recommend or implement WDM that is most appropriate for the situation. Summary descriptions of the various traps used are provided in EIR/EIS Appendix C.

The assertion that California law requires that traps be checked every 24 hours is incorrect. California Code of Regulations Section 465.5(g)(2) states that traps must be checked "daily," which could result in a longer timeline than the referenced 24 hours. For example, checking a trap in the morning on one day and in the afternoon on the next day would be longer than 24 hours but consistent with regulations.

Commenter recommends that WS-California use trap monitor devices. As the commenter states, National Wildlife Research Center (NWRC) (2007) demonstrated that trap monitors can save money and time when capture rates are low. However, NWRC (2007) also noted that visits per active trap

decrease from 365 visits per year to on average 7.4 times per year when monitoring devices are used. WS-California does use trap monitoring devices within the array of equipment used for WDM activities; however, their application may be limited by trap type, location, cellular service availability, and other uncontrollable elements. As such, while they are a useful tool, they cannot be used in every situation and are not required by law. Additionally, the humaneness of traps is examined in Section 5.5 of the EIR/EIS. When appropriate, wildlife specialists may ask the cooperator to monitor a trap and to notify the wildlife specialist when the trap has been triggered.

Commenter asserts that the EIR/EIS does not adequately discuss the inhumaneness associated with enclosed foothold traps (or dog-proof traps), which are generally used for trapping raccoons and opossums and are included as BMP traps for both species. The CDFA and WS-California reviewed Hubert et al. (1996), which found the EGG trap™ (an example of an enclosed foothold trap used for raccoons) to be more humane than coil spring traps. It reduced the severity of trap-related injuries and self-mutilation. The study also cited the Proulx and Barrett (1993) conclusion that the EGG trap was humane. These citations support the analysis and the inclusion of this method.

04-44 through 04-55 Commenter claims that the EIR/EIS fails to adequately assess the humaneness of body grip traps. Commenter asserts that body-grip traps are inhumane. The humaneness of body grip traps on target and non-target species is discussed in Section 5.5 of the EIR/EIS and in the Wildlife Services 2022 peer-reviewed risk assessment of the use of quick-kill traps (body-grip traps) in WDM.

Commenter requests that the type of body-grip traps used and their non-target capture rates be made available. The type of body-grip traps available to wildlife specialists in California is described in Appendix C of the EIR/EIS. Non-target capture rates are discussed in Section 4 of the BTR and are publicly available in program data reports on the Wildlife Services website (<https://www.aphis.usda.gov/wildlife-services/publications/pdr>).

Commenter does not provide any legal authority or explanation to support the claim that to satisfy CEQA/NEPA requirements, WS-California must disclose information about body-gripping traps such as the intended strike location, strike momentum, clamping force, expected percentage of accurate strikes (with data to support this), time to death, time to unconsciousness, and injury/wounding scores.

04-56 Commenter claims that the EIR/EIS fails to adequately assess the humaneness of gas cartridges, and that the EIR/EIS should analyze risks to non-target species of sublethal dosing from gas cartridges or if a gas cartridge is set improperly. Sublethal doses of carbon monoxide from gas cartridges are rare but possible, as stated in the 2019 peer-reviewed Wildlife Services risk assessment on the use of carbon monoxide (gas cartridges) in WDM. Sublethal doses are avoided by wildlife specialist personnel correctly identifying the target species' use of a burrow, determining the size and extent of a burrow system, and using multiple gas cartridges to ensure enough carbon monoxide is produced. This generally precludes take of non-targets or administration of sublethal doses, barring a serious malfunction. Per the gas cartridge pesticide label, gas cartridges are not applied in areas where T&E species could be present, so non-target T&E species do not face a substantial risk from gas cartridge use. Humaneness has been considered and analyzed within this EIR/EIS; however, a policy level decision as to the appropriateness of any specific method on humaneness grounds is beyond the scope of NEPA and CEQA. Please refer to Section 4.2.4, Hazards and Hazardous Materials, of the EIR/EIS for more detailed discussion and analysis. Please also refer to Section 1.2.10 of this document and Section 5.5 of the EIR/EIS.

04-57 through 04-60 Commenter asserts that aerial gunning is inherently inhumane. Please refer to Section 1.2.10 of this document and Section 5.5 of the EIR/EIS.

04-61 through 04-63 Commenter claims that the EIR/EIS fails to adequately assess lethal WDM operations on non-target species, including T&E species. Please refer to Section 1.2.17, Non-Target Species, and Section 1.2.16, T&E Species, of this document.

04-64 through 04-68 The commenter's proposed alternatives are not so functionally different from alternatives already considered in the EIR/EIS that they would result in a different environmental impact. A reasonable range and comparative analysis of alternatives has been developed, analyzed, and documented within this EIR/EIS consistent with CEQA and NEPA requirements. Please refer to Section 1.2.12, Alternatives, of this document.

04-69 Please refer to Section 1.2.9, Non-Lethal WDM.

04-70 through 04-73 Commenter claims that the EIR/EIS failed to consider 14 articles that show that there is better evidence for functional effectiveness in preventing livestock losses from non-lethal methods than from lethal methods. The "gold standard" protocol prescribed by Treves et al. (2016) is called the randomized controlled trials protocol and involves identifying and establishing sufficiently similar sites, randomly assigning control and test status to those sites, and sampling at all sites simultaneously before and after the management actions occur. This type of protocol is often used in controlled biomedical research where the variables between test groups can be minimized and/or controlled. Treves et al. (2016) also designated a "silver standard" of literature, which is a non-randomized version of the gold standard, called before-after control-impact, so long as the study is free of other biases. Treves does not recommend before-after control-impact study design (WildEarth Guardians 2022).

Khorozyan and Waltert (2019) identified several situations where the randomization required by randomized controlled trials prescribed by Treves et al. (2016) is not possible or practical and recommended modifications to the before-after control-impact design to accommodate producers who are not willing to cease all predator management for a study. Khorozyan (2021) did not find any before-after control-impact studies of physical deterrents, electric fencing, translocation, trapping, shooting, calving control, or changing livestock type, but concluded that it would be possible to do these studies. However, Khorozyan (2021) also determined that randomized controlled trials is not an appropriate study design for shooting, translocation, or geofences. The majority of relevant literature that is currently available is sufficient for drawing conclusions about the efficacy and applicability of the WDM methods and strategies. Please refer to Appendix B, Laws, Policies, and Ordinances, of the EIR/EIS for additional information on the basis for WDM methodologies and directives.

The commenter claims that the information presented by Treves et al. (2016), Treves et al. (2019), van Eeden et al. (2018), and Treves et al. (2023) represents the best available science. These studies have criticized certain research on lethal WDM methods and recommend suspension of these tools until more rigorous scientific studies prove their efficacy. These researchers call for new study designs that use the same standards as those in controlled laboratory settings for biomedical research. NWRC research scientists have evaluated these papers and do not agree with the authors' assessments that existing research is flawed (USDA APHIS 2016; Breck 2018). There are important differences between research studies conducted in a field environment and studies in biomedical laboratory settings. Field research inherently brings in variables such as weather, varying habitat quality, and movement of

wildlife that cannot be controlled. Assumptions must be made when trying to answer complex ecological questions in field settings. Scientists address and acknowledge these variabilities using well-established and recognized field study designs, such as the switch-back and paired block designs. Wildlife Services and the CDFA agree that WDM tools and techniques must be based on rigorous, scientifically sound principles. Researchers at NWRC are dedicated to gathering information, testing new ideas and methods, and using experiments (versus observational studies) to the greatest extent possible. Wildlife Services scientists at NWRC's Utah Field Station in particular are leaders in the design and implementation of controlled studies to evaluate predation and predator damage management methods. They collaborate with experts from around the world to conduct these studies and findings are published in peer-reviewed literature.

Eklund et al. (2017), Khorozyan and Waltert (2020), Bruns et al. (2020), Khorozyan and Waltert (2021), Lennox et al. (2018), Miller et al. (2016), Moreira-Arce et al. (2018), and van Eeden et al. (2018) review previously published literature on WDM. The authors of these articles found that both lethal and non-lethal methods can be effective or ineffective, depending on environmental conditions, the predator species targeted for management, and the long-term goals of the management action. These articles do not add substantively to the information or analyses in the EIR/EIS. Whether or not some of these studies met the criteria established by these authors does not imply that better science is available. The need to repeat or continually implement a WDM method is not necessarily an indicator that the method is ineffective. Very few methods, non-lethal or lethal, provide permanent resolution of wildlife conflicts without ongoing effort. Just as lethal methods may need to be periodically repeated on the same property, non-lethal methods such as herding, livestock guarding animals, and frightening devices require sustained effort to implement for effective damage reduction, yet these methods are commonly perceived to be effective. WS-California, the CDFA, and Counties, as applicable and appropriate, respond to individual depredation events to assist in resolving those conflicts, then address the next conflict as requested and funded. Given the analysis in Chapter 4 of the EIR/EIS that indicates predator populations quickly recover from removals by wildlife specialists, this approach does not guarantee predation events will not recur at some later point. WS-California does provide technical assistance on methods that make it less likely for predation to reoccur (e.g., fencing, habitat management, carcass disposal, livestock husbandry practices, livestock guarding animals) where applicable.

04-74 through 04-78 Commenter claims that evidence for functional effectiveness of proactive or preventative practices are lacking and lethal WDM may cause increase in livestock depredations due to disruption of species spatio-temporal activities and compensatory reproduction in coyotes. This would mean lethal WDM leads to increased populations and support the conclusions in 4.2.2.4 Biological Resources Impact Analysis regarding less than significant/not significant impacts on target species populations. Section 3.2.3.2 of the BTR discusses potential environmental effects of coyote removal and the proposed project maximum lethal take estimate. Commenter supplied literature on this topic discusses the effects of sport hunting. The California WDM program does not include the activity of sport hunting. We are unaware of any data that indicates that recovery of coyote or mountain lion populations from lethal WDM directly correlates to an increase in livestock depredations.

04-78 through 04-83 Commenter is concerned that removal of native predators may impact ecosystems, lead to extinctions trophic cascades, and reduced biodiversity. The EIR/EIS includes considerable discussion of biological resources. Please refer to Section 1.2.9, Non-Lethal WDM and Section 1.2.14,

Biodiversity, species analysis in Chapter 4 Biological Resources supported by analysis of direct, indirect, and cumulative effects in Appendix D: Biological technical Report (BTR) of the EIR/EIS, and the BTR's Appendix D: a summary of literature related to trophic cascades.

04-84 Commenter recommends a different spatial scale for the EIR/EIS analyses. The commenter asserts that a separate impact analysis should be completed for WDM conducted on public lands and Special Designation Areas. Commenter also claims that the EIR/EIS fails to consider the localized impact of lethal removal on baseline local populations and that site-specific population data are required for a proper analysis. The analyses in the EIR/EIS of potential impacts on statewide and countywide populations indicate that this level of analysis is not warranted, because the proportion of cumulative take contributed by the CDFA, WS-California, and county wildlife specialists is low for wildlife targeted during WDM. It is redundant to conduct the same analysis of the same issues and alternatives at a smaller scale; an analysis conducted at the statewide or county scale is more informative. Though the commenter may disagree with the rationale, the analysis in Section 3.2.3 of the BTR (Appendix D to the EIR/EIS) cites peer-reviewed literature to support the conclusion that local populations of coyotes may experience a temporary decline, but quickly re-occupy the area. The state- and county-level scope of the EIR/EIS works in good faith to ensure a robust and cumulative analysis of potential impacts to wildlife populations in California.

04-85 through 04-127 Please refer to Section 1.2.15, Wolves.

04-128 through 04-142 Commenter proposes changes to California regulations to prevent night-time hunting/shooting of coyotes. Changes to State fish and game laws and regulations are not within the authority of the CDFA or WS-California. The impact of the use of these methods by WS-California on Gray wolves was evaluated in the 2014 and 2020 Section 7 consultations and was found to not jeopardize the continued existence of the species. See Section 1.2.15, Wolves, for more detail on WS-California Section 7 consultations.

04-143 The comment serves as a conclusion to the comment letter and no further response is required.

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Info CaliforniaWDM

From: Lindsey Carter <lindseyl@cacasa.org>
Sent: Tuesday, March 12, 2024 11:05 AM
To: Info CaliforniaWDM
Cc: King, Ed J.
Subject: California Wildlife Damage Management Draft EIR/EIS Comments
Attachments: Wildlife Services EIR.EIS - Comment Letter.pdf

California WDM
2121 Broadway
P.O. Box 188797
Sacramento, CA 9581

Sent via email:
info@CaliforniaWDM.org

RE: California Wildlife Damage Management Draft EIR/EIS Comments

The California Agricultural Commissioners and Sealers Association (CACASA) applauds the California Department of Food and Agriculture (CDFA) and Wildlife Services-California (WS-California) Draft Environmental Impact Report-Environmental Impact Statement (EIR/EIS). The Draft EIR/EIS provides a comprehensive analysis of wildlife damage management (WDM) activities undertaken in California and identifies a practical and environmentally sound Proposed Project/Proposed Action to effectively protect agriculture, natural resources and human health and safety.

05-1

The California Food and Agricultural Code, Section 2003, establishes CACASA as the official representative body of California's County Agricultural Commissioners and Sealers of Weights and Measures. Representing all of California's 58 counties, County Agricultural Commissioners and Sealers of Weights and Measures have dual roles of promoting and protecting the state's food supply, agricultural trade, environment, public health and safety, consumer confidence and a fair marketplace. Unique to California, Agricultural Commissioners and Sealers work cooperatively with CDFA and the Department of Pesticide Regulation, other state and federal agencies and stakeholders to implement regulatory programs at the local level. Supporting state and federal efforts, Agricultural Commissioners prevent the introduction, establishment and spread of invasive and nuisance pests, including wildlife determined to be injurious to agricultural and natural resources, threatened and endangered species, property and infrastructure and human health and safety.

05-2

CACASA supports the Draft EIR/EIS Proposed Project/Proposed Action. The Proposed Project/Action is the most comprehensive, practical and effective option of the considered alternatives. It creates a coordinated, accountable and adaptive WDM program to resolve wildlife conflicts and protect the breadth of California's agriculture, natural resources and human health and safety from wildlife impacts while also protecting wildlife as an equally valued resource. Notably, CACASA supports the following elements of the Draft EIR/EIS Proposed Project/Action:

05-3

Interagency collaboration

The Proposed Project/Action reintegrates CDFA into state WDM activities with an expanded role beyond its previous (pre-2003) WDM program objectives. Reestablishment of CDFA as an active collaborator and partner with WS-California and counties will advance informed, consistent and compliant WDM activities throughout the state, including: improved high-risk wildlife damage rapid response, advancement of new tools and implementation measures to mitigate unintended impacts to wildlife and other natural resources, build a statewide information management system to track, evaluate and adapt integrated WDM activities and facilitate County environmental compliance.

05-4

Addresses wildlife species known to, or likely to, cause conflicts

The Proposed Project/Action encompasses analyses of wildlife species most commonly responsible for agricultural, natural resources and human health and safety conflicts; and, applies direct effect analyses of lethal and non-lethal WDM activities,

05-5

using the most conservative population estimates, to assess potential impacts to target and non-target wildlife populations.

↑ 05-5
Cont.

Utilizes integrated and adaptive WDM methods and practices

The Proposed Project/Action includes a range of environmentally sound and integrated methods and practices (biological, economic, environmental and legal) to evaluate and respond to WDM issues. This approach assures CDFA, WS-California and counties (in consultation with CDFW and USFWS as needed) are equipped with the most appropriate tools and options to provide effective WDM technical and operational assistance in differing scenarios and environments.

05-6

Further, California's \$55 billion agricultural industry produces more than 400 commodities including more than one-third of the country's vegetables and nearly three-quarters of the country's fruits and nuts. The Proposed Project/Action is essential to securing these resources and protecting the nation's food supply.

05-7

CACASA appreciates the opportunity to comment and are available to answer questions and to work with CDFA and WS-California as needed.

05-8

Thank you for the consideration,



Lisa D. Herbert
President

Lindsey (Liebig) Carter

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California Agricultural Commissioners and Sealers Association



March 7, 2024

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CACASA supports the Draft EIR/EIS Proposed Project/Proposed Action. The Proposed Project/Action is the most comprehensive, practical and effective option of the considered alternatives. It creates a coordinated, accountable and adaptive WDM program to resolve wildlife conflicts and protect the breadth of California's agriculture, natural resources and human health and safety from wildlife impacts while also protecting wildlife as an equally valued resource. Notably, CACASA supports the following elements of the Draft EIR/EIS Proposed Project/Action:

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management system to track, evaluate and adapt integrated WDM activities and facilitate County environmental compliance.

Addresses wildlife species known to, or likely to, cause conflicts

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Thank you for the consideration,

Lisa D. Herbert
President

Response to Comment Letter O5

California Agricultural Commissioners and Sealers Association
Lisa Herbert
March 7, 2024

05-1 through 05-8 Thank you for your supportive comments. Please refer to Section 1.2.2, Support Proposed Project/Proposed Action.

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Via email only

12 March 2024

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RE: California Wildlife Damage Management Project Draft Environment Impact Report/Draft
 Environmental Impact Statement (SCH Number 2020099012 / EIS No. 20240003)

Dear Dr. Jones and Dr. Anderson,

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

Both our physical and email addresses are provided above in our letterhead for your use when providing future correspondence to us. When given a choice, we prefer to receive emails for future correspondence, as mail delivered via the U.S. Postal Service may take several days to be delivered. Email is an "environmentally friendlier way" of receiving correspondence and documents rather than "snail mail."

O6-1

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats occupied by the Mojave desert tortoise (*Gopherus agassizii*) (synonymous with Agassiz's desert tortoise), our comments include recommendations intended to enhance protection of this species and its habitat during activities authorized by the U.S. Department of Agriculture – Wildlife Services in California (WS-California) and California Department of Food and Agriculture (CDFA), which we recommend be added to interagency agreements and directives (e.g., memorandums of agreement, etc.) for implementing wildlife damage management (WDM) activities, as appropriate. Please accept, carefully review, and include in the relevant project file the Council's following comments and attachments for the proposed project.

O6-2

The Mojave desert tortoise is among the top 50 species on the list of the world's most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), "... based on population reduction (decreasing density), habitat loss of over 80% over three generations (90 years), including past reductions and predicted future declines, as well as the effects of disease (upper respiratory tract disease/mycoplasmosis). *Gopherus agassizii* (sensu stricto) comprises tortoises in the most well-studied 30% of the larger range; this portion of the original range has seen the most human impacts and is where the largest past population losses have been documented. A recent rigorous rangewide population reassessment of *G. agassizii* (sensu stricto) has demonstrated continued adult population and density declines of about 90% over three generations (two in the past and one ongoing) in four of the five *G. agassizii* recovery units and inadequate recruitment with decreasing percentages of juveniles in all five recovery units."

O6-3

This status, in part, prompted the Council to join Defenders of Wildlife and Desert Tortoise Preserve Committee (Defenders of Wildlife et al. 2020) to petition the California Fish and Game Commission in March 2020 to elevate the listing of the Mojave desert tortoise from Threatened to Endangered in California. In its status review, California Department of Fish and Wildlife (CDFW) (2024) stated: "At its public meeting on October 14, 2020, the Commission considered the petition, and based in part on the Department's [CDFW] petition evaluation and recommendation, found sufficient information exists to indicate the petitioned action may be warranted and accepted the petition for consideration. The Commission's decision initiated this status review to inform the Commission's decision on whether the change in status is warranted."

O6-4

Importantly, in their February 2024 status review, CDFW concluded: **"The Department's recommendation is that uplisting the Mojave Desert Tortoise is warranted."** Receipt of this [status review] report is to be placed on the agenda for the next available meeting [expected in April 2024] of the Commission after delivery [at the February meeting]. At that time, the report will be made available to the public for a 30-day public comment period prior to the Commission taking any action on the petition."

O6-5

Description of the Proposed Program

The California Department of Food and Agriculture (CDFA) and the U.S. Department of Agriculture, Wildlife Services in California (WS-California) have prepared a joint California Environmental Quality Act (CEQA) /National Environmental Policy Act (NEPA) document to

O6-6

analyze the impacts of a proposed change to the current program implemented by WS-California. WS-California currently uses an integrated approach to recommend and apply a range of legally available nonlethal and lethal methods for reducing wildlife damage and conflicts. Potential methods used as part of Wildlife Damage Management (WDM) can include physical exclusion, harassment and deterrence, capture devices, and lethal techniques.

O6-6
Cont.

Under the proposed program the CDFA would have a new role in statewide activities that is similar to WS-California's existing WDM activities. Thus, this CEQA/NEPA document analyzes the impacts of implementing a change to a program rather than proposing a new project.

O6-7

CDFA and WS-California describe six alternatives in the Draft EIR/EIS:

Alternative 1, No Project/Continuation of WS-California: This is the No Action or No Change Alternative. No new CDFA or county WDM would be established. This alternative would not include any CDFA or county-led emergency/rapid response activities. WS-California would continue to operate WDM. This would include threatened and endangered species protection and airport wildlife hazard management (WHM). This alternative includes collaboration and identification, education and training, technical assistance, non-lethal and lethal operational WDM, and monitoring. WS-California could also loan equipment to cooperators/requestors for WDM activities.

O6-8

Alternative 2, Non-Lethal Operational WDM with Exceptions: The CDFA/Counties/WS-California would provide technical assistance on lethal and non-lethal techniques and/or provide non-lethal operational WDM assistance, but would not provide lethal WDM assistance, except for cases of human health and safety, companion animal health and safety, T&E species protection, and airport WHM. Components of Alternative 2 include collaboration and identification, education and training, technical assistance, non-lethal operational WDM, and monitoring. The CDFA/Counties/WS-California could also loan equipment used for non-lethal techniques and/or other WDM activities.

O6-9

Alternative 3, Non-Lethal Operational WDM: The CDFA/Counties/WS-California would provide technical assistance on lethal and non-lethal techniques and provide only non-lethal operational WDM assistance. No lethal operational WDM assistance would be provided. Components of Alternative 3 include collaboration and identification, education and training, technical assistance, non-lethal operational WDM, and monitoring. The CDFA/Counties/WS-California could also loan equipment used for non-lethal techniques and/or other WDM activities. Alternative 3 could include CDFA/County/WS-California emergency/rapid response activities, but no lethal methods.

O6-10

Alternative 4, Financial Reimbursement Assistance: Alternative 4 is for CEQA consideration only. Participating counties could establish monetary compensation to affected cooperators/requestors (producers), with a focus on funding improved protection from damaging wildlife (e.g., upgrade of fencing, acquisition of guard animals). This alternative would not include operational assistance provided by the CDFA/WS-California. This alternative would not preclude the right of private entities to conduct lethal WDM on their own in accordance with state and federal laws.

O6-11

Alternative 5, Cessation of WS-California: Alternative 5 would not establish or formalize a CDFA WDM Program in California or technical or operational assistance with WDM methods or provision of financial reimbursements as described in Alternative 4. Potential WDM would be handled by other entities, including but not limited to tribes, USFWS, CDFW, Counties, private-resource owners and managers, private contractors, and/or other non-federal agencies.

O6-12

Proposed Alternative: CDFA would have a new role in statewide activities, formalizing a program that provides an adaptive and integrated approach, cooperator/requestor participation, technical assistance on lethal and non-lethal techniques, and/or lethal and non-lethal operational WDM assistance that is similar to WS-California's existing WDM activities. CDFA would also be a centralized data repository for integrated WDM activities (coordination and documentation review), participate in education and outreach, enact a rapid response plan for emergency WDM incidents and/or infestations, and conduct analysis of independent County integrated WDM programs (note that WDM activities of more limited scope could be delegated to individual counties by the CDFA, responding to their specific needs). WS-California would continue to provide technical assistance on lethal and non-lethal WDM techniques and/or provide lethal and non-lethal operational WDM assistance. This alternative would include WS-California T&E species protection and wildlife hazard management (WHM) at airports.

O6-13

Comments on the Draft EIR/EIS

The Council's comments on the DEIR/DEIS are focused on how the proposed change to the WDM program would impact the tortoise/tortoise habitat in California both directly and indirectly. WS-California, CDFA, and counties would implement, as appropriate, methods currently used by WS-California to manage target wildlife species.

O6-14

CDFA and WS-California identified the Preferred Alternative (called the Proposed Alternative) in the DEIR/DEIS. The Council requests the environmentally preferred alternative be identified in the EIR/EIS with a discussion of how the lead agencies made this determination.

O6-15

The Council acknowledges and is supportive of implementing methods that reduce wildlife predation on the Mojave desert tortoise and other threatened and endangered species when this threat has been identified as an impact contributing to the decline of the species. We support management of tortoise predators to ensure that tortoises are able to survive, grow, reproduce, and recruit new individuals to grow tortoise populations and eventually recover the species. In California, all tortoise recovery units have tortoise densities that are below the threshold needed for population viability (USFWS 1994, Allison and McLuckie 2018, USFWS 2016, 2018, 2019, 2020, 2022a, 2022b).

O6-16

However, the implementation of these WDM activities must not adversely affect non-target species [Non-target species are those captured or otherwise affected unintentionally during the implementation of WDM activities that targeted a different species.]. Similarly, the activities implemented for WDM must not adversely impact protected non-target species including the

O6-17

tortoise. These species, especially those listed under the Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA) and fully protected species cannot afford to lose additional individuals because the persons recommending or implementing the WDM activities have not been educated about the ecology and behavior of, and threats to these species. Thus, it is crucial that this knowledge is formally shared, updated, and routinely taught to the people who will be recommending or implementing the WDM in the field, the wildlife specialists.

06-17
Cont.

The description of the Proposed Alternative does not include training. Alternatives 1 through 3 do include training. The Proposed Alternative should include initially a robust training program to train CDFA and county personnel who will be implementing the duties of wildlife specialists in the regulatory requirements they must follow when implementing this program. The WS-California wildlife specialists should assist in administering this training.

06-18

The Council is concerned that CDFA, the counties, and their agents may not have personnel/wildlife specialists with (1) the knowledge and experience to know when they are in the range of a species listed under the FESA, CESA (e.g., Mojave desert tortoise, etc.), or protected by other regulatory methods, (2) the knowledge of what those regulatory protections mean, and (3) the knowledge and experience of the behavior and ecology of and threats to the protected species to select the appropriate lethal or non-lethal methods for the target species that will avoid take (including harming and harassing) of protected non-target species.

06-19

When the Federal Highways Administration (FHWA) delegated its authority to the state transportation agencies several years ago, some of the states in the range of the tortoise took years to learn and properly implement federal environmental laws and regulations for federal highway projects. Similarly, the Council can provide examples of county agencies in California that carry out their missions but lack staff with knowledge of federal environmental laws and regulations. In some instances, their actions resulted in take of species listed under FESA with no take authorization.

06-20

One of the goals of implementing the WDM activities should be to eliminate adverse impacts to non-target species that occur because the activities selected were not compatible with the ecology and behavior of the non-target species. In addition, monitoring the results of implemented WDM activities and regularly reporting and sharing this information is crucial to eliminate adverse impacts to non-target species. Consequently, the Council strongly recommends that the Preferred Alternative include implementing a robust training program to train all current and future personnel who will be performing the duties of a wildlife specialist and their agents about federal and California environmental laws, requirements to follow them, coordination with appropriate federal and California state agencies, and monitoring to determine whether the training program is effective.

06-21

Page 1-23: Beginning on this page and throughout the Draft EIR/Draft EIS, the word “take” is used but not defined. Sometimes it is coupled with “lethal” which implies that take as used in this document may be either lethal or non-lethal.

06-22

“Take” is defined under the FESA to mean “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” We suggest that “take” should be defined in the EIR/EIS.

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Cont.

Page 2-15, Wildlife Services Decision Model: This figure shows that when formulating a wildlife damage management strategy, coordinating with local jurisdictions and partner wildlife agencies would occur. We suggest adding interested organizations, as some private groups and businesses may have expertise and approaches that are more effective than those being implemented by wildlife specialists and their agents and have less of an impact on non-target species.

06-23

Page 3-6: The following statement is provide in the Draft EIR/EIS – “Alternatives 3, 4, and 5 would not have an effect on target species as no lethal operational WDM would occur.” We are confused by this statement. Under Alternative 3, WS-California would provide non-lethal operational WDM assistance. This non-lethal assistance may result in harming or harassing animals (e.g., the activity forces the animal to leave the area, and this movement results in adverse physiological impacts to the species including death). The Draft EIR/EIS should define what “an effect” is, because we would consider this an adverse effect to the target species but accomplishing the purpose of the implemented activity.

06-24

Page 3-6, Non-Target Species: This section is missing information on the protections provided to species listed under the CESA, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, and California Fish and Game codes for fully protected species and certain furbearers. Please add these laws/codes to this section of the document.

06-25

Page 4.2.2-5: This section includes Table 4.2.2-6 with the Mojave desert tortoise indicated in as a species intended as a beneficiary of WS-California activities. Below it in the document is a discussion of target and non-target species. The tortoise is not included in this discussion. For example, our understanding is that during access to some sites in the Mojave and Colorado deserts (including driving off of dirt roads) and use of some methods for lethal take of target species, the tortoise may be accidentally killed or injured. Please explain this absence of information on the tortoise.

06-26

Page 4.2.2-6, Table 4.2.2-3. Threatened and Endangered Bird and Mammal Species Intended as Beneficiaries of WS-California Activities (2010–2019): The desert tortoise is included in this table. Please add “Reptiles” to the name of this table as the tortoise is not a bird or a mammal.

06-27

Page 4.2.2-6: “Other special-status species that could benefit from removal of target species by the Proposed Project/Proposed Action include...smaller species such as kangaroo rats (*Dipodomys* sp.), arroyo toads (*Anaxyrus californicus*), and Tehachapi slender salamanders (*Batrachoseps stebbinsi*).” We suggest adding the Mohave ground squirrel (*Xerospermophilus mohavensis*) that is listed as threatened under CESA to this list.

06-28

Page 4.3-9, Wildfire: This section discusses the precautions that would be implemented for actions that could result in fire hazards, such as pyrotechnics or propane exploders. In addition, “known areas of moderate, high, and very high fire hazard risk would be subject to local regulations and applicable best practices.”

06-29

In years with above average precipitation, the germination and growth of non-native invasive plants in the Mojave and Colorado deserts after drying provide a near continuous carpet of fuel that can carry a fire started by anthropogenic sources such as catalytic converters from the operation of a vehicle and disposing of lighted cigarettes outside. WS-California, CDFA, and county personnel should implement additional precautions to ensure that their typical actions do not cause a wildfire. Please consider this information when assessing the impacts of the alternatives to the resource issue of wildfire.

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Appendix C, Wildlife Damage Management Methods

Methods used for target species include various types of nets and traps, fences, and pyrotechnics. These methods have the potential to adversely impact the tortoise.

06-31

Nets and Traps: If located on or near the ground in the range of the tortoise, a tortoise may become entangled in the net resulting in injury or mortality. This occurred at the Marine Corps Air Ground Combat Center at Twentynine Palms when a camouflage netting was secured to the ground.

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Fences: We presume that fencing would not be used in the Mojave or Colorado deserts as fencing could disrupt a tortoise's movement in its home range, causing it to pace along the fence in an attempt to get to the other side, overheat, and die (Peaden et al. 2017).

06-33

Pyrotechnics: Ignition sources are a concern when used in the desert as they may ignite wildfires. Please see our comments above for Page 4.3-9, Wildfire.

06-34

Page C-2-1: "CDFA shall adopt the Wildlife Services Directives as part of the WDM Program." This adoption does not mean that it is immediately implemented. We reiterate the need for a robust training program to be implemented with WS-California, CDFA, counties, and their agents.

06-35

A footnote on this page says "wildlife specialists" refer to CDFA and/or County personnel (or their agents thereof) that have been specifically trained to carry out WDM activities and methods, including technical assistance as well as operational activities in the field. Wildlife specialists are required to undergo periodic education in current WDM techniques (including use of special equipment such as federally-licensed firearms, pyrotechnics, and specialized traps), and to carry out WDM activities and methods in compliance with local, state, and federal laws."

06-36

Unfortunately, "periodic" is not defined, training budgets are tight, and this verbiage does not mention training in the ecology and behavior of and threats to non-target protected species that would include the tortoise. These areas of knowledge are appropriate for someone with the title of wildlife specialist.

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This statement does not restrict these activities to being carried out by wildlife specialists at CDFA, the counties, or their agents. We recommend this restriction be clearly state in the EIR/EIS.

06-38

Page C-2-2: Animal husbandry modifications are described and include options such as the use of guarding animals (e.g., dogs). Using unleashed and unsupervised dogs in the Mojave or Sonoran Desert may result in dogs finding and injuring or killing tortoises. Unleashed dogs are a known

06-39

source of tortoise predation (Berry et al. 2014). This is another example of a method that would be flagged as inappropriate if the wildlife specialist were knowledgeable about the threats to the tortoise.

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Cont.

Page C-2-19, Gas cartridges: “The cartridges are placed in the active burrows of target animals, the fuse is lit, and the entrance is then tightly sealed with soil. The gas cartridges contain two active ingredients, sodium nitrate and charcoal, and once ignited the main combustion product is carbon monoxide.” Use of gas cartridges would only be used by qualified wildlife specialists who have been trained to distinguish dens and burrows of target species from those of non-target species and not in occupied habitats of T&E species as per listed on label.”

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Germano and Perry (2012) reported cohabitation of a caliche cave by an American badger (*Taxidea taxus*) and an adult desert tortoise. The tortoise was unharmed even though badgers are known predators of desert tortoises.

06-41

The stipulation for gas cartridge use and the cohabitation of a tortoise with a badger reinforces the need for training in the behavior and ecology of and threats to the tortoise.

06-42

Appendix D, Biological Technical Report Wildlife Damage Management Project

Page 8: The Council believes the common raven (*Corvus corax*) should be included in the list of target species for the Mojave Desert, as it is a predator of hatchling and juvenile Mojave desert tortoises and that California-WS has removed predatory ravens in the past. Please add this target species to the list.

06-43

According to CDFW, the range of the California ground squirrel overlaps part of the range of the Mojave desert tortoise. The California ground squirrel and other rodents are target species. Their burrows are used by hatchling and juvenile desert tortoises. This behavioral and ecological information is crucial for a wildlife specialist to know when recommending/using methods to implement to manage target species. This is another example of why training about the ecology and behavior of non-target protected species in the range of where WDM activities would be implemented is necessary to minimize the take of non-target species and to prevent violating federal and state environmental laws.

06-44

Page 8: “Figure 2 shows the ecoregions and wildlife movement corridors within the study area (i.e., the State of California).” When we looked at Figure 2, the wildlife movement corridors shown were mapped at a gross scale, likely only reflecting movements between ecoregions and not within ecoregions. Although a nontarget species, the Mojave desert tortoise’s movements have been studied and connectivity routes mapped for this species within the Mojave and Sonoran deserts. We suggest contacting the Desert Tortoise Recovery Office of the U.S. Fish and Wildlife Office to obtain the most recent information on population connectivity and linkage habitats for the tortoise.

06-45

Page 30: “[I]f a non-target species is caught, every effort is made to release it unharmed unless the non-target animal is injured and determined to be not likely to survive if released.” Please provide information on what the procedure is to treat an injured, protected non-target species or physiologically stressed protected non-target species. We ask this because the tortoise has special

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physiological (Zimmerman et al. 1994, Peterson 1996, Henen et al. 1998) needs especially with respect to ambient and core body temperatures and water balance.

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Cont.

Appendix D Biological Technical Report Wildlife Damage Management Project, Appendix A Section 7 Consultation History

This appendix to an appendix provides information on past compliance with the FESA. However, we were not able to find information on compliance with CESA such as copies of incidental take permits issued by CDFW for incidental take of protected species under CESA from implementation of WDM methods or correspondence between WS-California and CDFW or CDFA and CDFW that explains why an ITP was not needed. Please add this information to the EIR/EIS.

06-47

Please explain what “MA,” “NLAA,” “NE,” and “NL TJ,” and single, double, and triple “*” mean in this appendix on section 7 consultation.

06-48

We appreciate this opportunity to provide the above comments and trust they will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the Council wants to be identified as an Affected Interest for this and all other projects funded, authorized, or carried out by the WS-California or CDFA that may affect desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we ask that you notify the Desert Tortoise Council at eac@deserttortoise.org of any proposed projects that WS-California or CDFA may authorize, fund, or carry out in the range of any species of the desert tortoise in the southwestern United States so we may comment on it to ensure WS-California and/or CDFA fully consider actions to conserve tortoises as part of their directives to conserve listed species in California.

06-49

Please respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this Project.

06-50

Respectfully,



Edward L. LaRue, Jr., M.S.

Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

cc. California State Clearinghouse state.clearinghouse@opr.ca.gov

Donna Lalli, Associate Administrator of APHIS Katrina.e.rudvyj@usda.gov,
aphis.customersupport@usda.gov

Ann McPherson, Environmental Review, U.S. Environmental Protection Agency,
mcperson.ann@epa.gov

Rollie White, Assistant Field Supervisor, Palm Spring Fish and Wildlife Office, U.S. Fish and Wildlife Office, rollie_white@fws.gov

Julie Vance, Regional Manager, Region 4 – Central Region, California Department of Fish and Wildlife, Fresno, CA, Julie.Vance@wildlife.ca.gov

Jaime Marquez, Environmental Scientist, Region 4, California Department of Fish and Wildlife, Fresno, CA Jaime.Marquez@wildlife.ca.gov

Trisha A. Moyer, Region 6 – Desert Inland Region, Habitat Conservation Program Supervisor, California Department of Fish and Wildlife, Bishop, CA, Patricia.Moyer@wildlife.ca.gov
 Heidi Calvert, Regional Manager, Region 6 – Inland and Desert Region, California Department of Fish and Wildlife, Heidi.Calvert@wildlife.ca.gov
 Brandy Wood, Region 6 – Desert Inland Region, California Department of Fish and Wildlife, Brandy.Wood@wildlife.ca.gov

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Response to Comment Letter O6

Desert Tortoise Council
Edward L. LaRue, Jr., MS
March 12, 2024

- 06-1 through 06-13** These comments consist of background information and introductory comments. The comments do not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comments are noted for the record and no further response is required.
- 06-14** This comment introduces the detailed comments to follow. See Responses to Comments 06-15 through 06-49.
- 06-15** Language identifying the environmentally preferred alternative (NEPA) and environmentally superior alternative (CEQA) has been added to the Executive Summary. These will also be identified in the Record of Decision and the Findings of Fact, respectively. Under NEPA regulations, the Record of Decision must identify the environmentally preferred alternative (40 CFR 1505.2[b]). The Proposed Project/Proposed Action has been identified as the environmentally preferable alternative because it allows WS-California to provide the greatest amount of assistance in resolving human-wildlife conflicts while also supporting the welfare of and harmony between wildlife and humans in accordance with NEPA Section 101. CEQA Guidelines Section 15126.6 define the environmentally superior alternative as meeting most of the needs of the basic project objectives, similar to satisfying the purpose and need, and resulting in the fewest or least severe combination of significant environmental impacts. The Proposed Project/Proposed Action has also been identified as environmentally superior alternative.
- 06-16** The CDFA and WS-California agree WDM is an important tool for the protection of threatened and endangered species.
- 06-17, 06-18, 06-19** Please refer to Section 1.2.16, T&E Species; Section 1.2.17, Non-Target Species; and Section 1.2.18, Training.
- 06-20** The CDFA and WS-California thank the commenter for this comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.
- 06-21** Please refer to Section 1.2.5, Transparency; Section 1.2.16; Section 1.2.17; and Section 1.2.18.
- 06-22** The CDFA and WS-California thank the commenter for their attention to detail. Clarifying language has been added.
- 06-23** As described in Section 2.1, Introduction of the EIR/EIS, the nature of independent and collaborative activities is not a finite set of predictable actions in specific locations, but rather, a process of responding to and minimizing damage caused by wildlife, which is inherently unpredictable both spatially and temporally. For each reported incident of wildlife damage, this process involves investigation of the damage, review of available methods, implementation of chosen methods, monitoring effectiveness of the methods, and adaptive management as necessary. WS-California, the CDFA, and Counties have engaged with and collected feedback from private groups and interested parties through outreach and the CEQA/NEPA process and continue to do so.

- 06-24** The CDFA and WS-California thank the commenter for their attention to detail. Clarifying language has been added.
- 06-25** Applicable policies, laws, and ordinances regarding WDM and wildlife management are provided in Appendix B of the EIR/EIS. The Bald and Golden Eagle Protection Act, California Endangered Species Act, Migratory Bird Treaty Acts, and the appropriate California Fish and Game Code Sections are included.
- 06-26** Table 4.2.2-6 in the EIR/EIS lists T&E species that may benefit from WDM. Only special-status species that may also be a target species of WDM are discussed in detail in this section. The desert tortoise is not expected to be a target species and thus is not discussed in detail in this section. While it is possible that desert tortoises and other non-target species could be incidentally taken during T&E protection activities (e.g., through vehicle strikes), those activities are part of the baseline conditions and would not substantially change as a result of the Proposed Project/Proposed Action. Only WS-California would continue to conduct these activities under the Proposed Project/Proposed Action. Any activities by WS-California related to protection of special-status species are conducted in close coordination with partners from USFWS to ensure impacts to non-target species are avoided. This includes implementing minimizing measures specified in federal Endangered Species Act (FESA) Section 7 consultations that are directed specifically at reducing vehicle mortality for desert tortoise (e.g., USFWS concurrence letter of August 17, 2021 [FWS-IMP/KER/LA/RIV/SB-17B0158-2111352]). Please also refer to Appendix D, Appendix A, USFWS Consultation.
- 06-27** The CDFA and WS-California thank the commenter for their attention to detail. This correction has been incorporated into the final document.
- 06-28** The CDFA and WS-California thank the commenter for their attention to detail. This correction has been incorporated into the final document.
- 06-29, 06-30, 06-31** WS-California, the CDFA, and county wildlife specialists would follow common sense safety measures such as not using explosives or parking vehicles in dry grass. WS-California, the CDFA, and county specialists would also follow manufacture's specifications and product recommendations to not use explosive devices near structures or flammable objects. WS-California, the CDFA, and county wildlife specialists also drive on established roads as much as possible. Please also refer to Section 4.2.4, Hazards and Hazardous Materials, of the EIR/EIS for more detailed discussion and analysis regarding the use of explosives.
- 06-32** FESA Section 7 consultations with USFWS are completed before conducting WDM in desert tortoise habitat. MM-BIO-7 states that entities conducting WDM under this EIR/EIS shall follow the protective measures in WS-California FESA Section 7 compliance. Refer to the FESA consultation history summarized in Appendix A to the BTR, which is itself Appendix D to the EIR/EIS. No WDM tools prohibited by protective measures developed during these consultations would be used in desert tortoise habitat.
- 06-33** Desert tortoise movement would be considered when recommending to landowners or managers that large-scale fencing be installed in desert tortoise habitat. Barrier fencing with mesh or electric fencing to exclude predators that may be installed by the CDFA, WS-California, or county wildlife specialists is typically only used for small areas, such as poultry coops or small pastures, which can be

circumnavigated by desert tortoise. Implementation of MM-BIO-4 in the EIR/EIS would ensure that movement of wildlife species is considered when WS-California, the CDFA, or county wildlife specialists are involved in installation of fencing.

06-34 WS-California, the CDFA, and county wildlife specialists would follow common sense safety measures such as not using explosives or parking vehicles in dry grass. WS-California, the CDFA, and county specialists would also follow manufacture's specifications and product recommendations to not use explosive devices near structures or flammable objects. WS-California, the CDFA, and county wildlife specialists also drive on established roads as much as possible. Please also refer to Section 4.2.4 of the EIR/EIS for more detailed discussion and analysis regarding the use of explosives.

06-35 Clarifying language has been added by the CDFA to Appendix C of the EIR/EIS.

06-36 through 06-39 Please refer to Section 1.2.18.

06-40, 06-41, 06-42 Please refer to Section 1.2.13, Chemical WDM, and Section 1.2.18.

06-43 The CDFA and WS-California thank the commenter for their attention to detail. This correction has been incorporated into the final document.

06-44 Please refer to Section 1.2.18.

06-45 WS-California is aware of the modeled desert tortoise connectivity referenced in the comment through extensive consultation with USFWS under Section 7 of the FESA. Desert tortoise movement was considered during preparation of the EIR/EIS, but impacts were considered to be unlikely and would be further minimized through implementation of MM-BIO-4, which would ensure that movement of wildlife species is considered when WS-California, the CDFA, or county wildlife specialists are involved in installation of fencing. Including desert tortoise movement corridors in the EIR/EIS would not substantially change the analysis or the conclusions therein. Please refer to Section 1.2.16.

06-46 Protocols for releasing protected non-target species from traps are included in Wildlife Services Directives (e.g., Wildlife Services Directive 2.310, Endangered and Threatened Species, and Wildlife Services Directive 2.315, Eagles in Wildlife Services Damage Management); local, state and federal laws and regulations (e.g., California Department of Fish and Wildlife Trapping Laws and Regulations); and Section 7 consultations. Documentation in the EIR/EIS on the step-by-step processes for releasing every protected non-target species from every type of trap would not substantially change the analysis or the conclusions therein. Please refer to Section 1.2.16 and Section 1.2.17.

06-47 Please refer to Section 1.2.16.

06-48 The CDFA and WS-California thank the commenter for their attention to detail. These corrections have been incorporated into the final document.

06-49, 06-50 Any individual or group may request to be included in the APHIS Stakeholder Registry and will be notified when NEPA documents for proposed projects are being initiated or are available for public comment. Additionally, individuals or groups can request to be informed by the lead agency when CEQA documents for proposed projects are available on the California State Clearinghouse.

Literature Cited Please refer to Section 1.2.19, Literature and Citations.

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Public Submission

Comment from Sierra Club California Wildlife Committee

Posted by the **Animal and Plant Health Inspection Service** on Mar 6, 2024

Comment

Wildlife in California has long suffered at the hands of agriculture. We cannot as a society who cares about protecting wildlife allow species to be killed. We have to do better and it is enlightening to see our state finally realize that there are many nonlethal methods to protecting crops and herds without causing harm to wildlife. Wildlife and agriculture can coexist by the use of nonlethal methods. We also need to ban the use of anti-coagulant rodenticides which kill mountain lions and other predators which they feed on dead rodents poisoned by rodenticides. The state has started a Beaver relocation program which helps to cut on Beaver damage to agricultural lands and this is a positive step in the right direction and I support that. A publicly assessable website where agencies can post for all to see, what poisons are being used and where would be very helpful before any control methods are used both lethal and nonlethal. Engaging a caring public helps to build trust.

07-1

APHIS-2020-0081-0023

Tracking Number

lta-gala-ncfz

- [Comment Details](#)
- [Submitter Info](#)
- Document Subtype

Public Comment

- Received Date

Mar 1, 2024

Response to Comment Letter O7

Sierra Club California Wildlife Committee
March 1, 2024

- 07-1** Please refer to Section 1.2.9, Non-Lethal WDM, and Section 1.2.5, Transparency. Additionally, the Proposed Project/Proposed Action does not include the use of rodenticide anticoagulants (e.g., brodifacoum or diphacinone).

Comment Letter I1

Info CaliforniaWDM

From: Karen Emanuel <karenabbychalice@yahoo.com>
Sent: Friday, January 12, 2024 4:03 PM
To: Info CaliforniaWDM
Subject: SUBSIDIZE THE PLANT BASED ECONOMY, NOT BIG AG

I I1-1

Response to Comment Letter I1

Karen Emanuel
January 12, 2024

I1-1 Please refer to Section 1.2.7, Economics.

Info CaliforniaWDM

From: Christina Williams <prpldrnfly@gmx.com>
Sent: Sunday, January 14, 2024 9:03 PM
To: Info CaliforniaWDM
Subject: Comment on California WDM Draft EIR/EIS

To Whom it May Concern:

I am writing as a life-long, born-and-raised, native Californian who cares about OUR wildlife. It is NOT wildlife's fault that there are "wildlife-agriculture" and "wildlife-human" conflicts; it is purely the fault of humans (TOO MANY humans). Wildlife are living, sentient beings who deserve to live and shouldn't be murdered simply because there are cattle ranchers on OUR public lands (where they shouldn't be, and where Californians DO NOT want them) and because too many humans have caused destruction of and encroachment on wildlife's homes due to urban sprawl and animal agriculture. Wildlife are not "aesthetic and economic resources", they are living, breathing, *feeling* beings who all have very important roles in California's ecosystem. DO NOT implement any option that allows lethal "management" of wildlife "damage", only implement strictly non-lethal options with non-lethal methods. Californians love our wildlife; we don't want them murdered in order to favor and protect outdated, unnecessary, barbaric, primitive, cruel practices and industries, including ranching, animal agriculture, hunting and trapping. And while we're on the topic, GET THE CATTLE RANCHERS OFF OF OUR LANDS.

I2-1

Thank you for taking the time to read my comment,
 Christina Williams
 Los Angeles, CA 90027

Response to Comment Letter I2

Christina Williams
January 14, 2024

- I2-1** The CDFA and WS-California do not regulate the land use of public lands. Please also refer to Section 1.2.1, Outside the Scope, and Section 1.2.11, Alternatives.

Comment Letter I3

Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Monday, January 15, 2024 4:09 PM
To: Info CaliforniaWDM
Subject: California WDM Draft EIR/EIS

Is a report issued every year, or just this year? Thanks, Margot Lowe

I I3-1

Response to Comment Letter I3

Margot Lowe
January 15, 2024

I3-1 Please refer to Section 1.2.3, Clarification.

Info CaliforniaWDM

From: srakestraw@charter.net
Sent: Monday, January 15, 2024 8:37 PM
To: Info CaliforniaWDM
Subject: RE: CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

This is hilarious! Photo shows wildlands cut up, degraded, and scraped raw for human use and activities. AND now the wildlife is accused of "damaging" the property??

I 14-1

From: "California WDM" <info@californiawdm.org>
Reply-To: "California WDM" <info@californiawdm.org>
To: <srakestraw@charter.net>
Sent: Fri, Jan 12 2024 03:29 PM
Subject: CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS
CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

[View this email in your browser](#)

CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

The California Department of Food and Agriculture (CDFA) and Wildlife Services-California (WS-California), a state office within the U.S. Department of Agriculture's (USDA) Animal Plant and Health Inspection Service (APHIS), have released the Draft California Wildlife Damage Management Environmental Impact Report and Environmental Impact Statement (EIR/EIS).

The Draft EIR/EIS can be accessed electronically at www.CaliforniaWDM.org/documents/.

To request a flash drive containing the Draft EIR/EIS, please fill out the form at the following link: <https://arcg.is/1izOvz>. The last day to request a flash drive is February 26, 2024.

The CDFA and WS-California invite public comment on the Draft EIR/EIS. A 60-day comment period will begin on January 12, 2024, and end on March 12, 2024. The CDFA and WS-California will evaluate comments on environmental issues received in response to the Draft EIR/EIS and will address comments in the Final EIR/EIS. All comments received will be available for public review as required and allowed by law. You may submit comments by either of the following methods:

- **Federal eRulemaking Portal:** Go to <https://www.regulations.gov/docket/APHIS-2020-0081>.

- **Electronic Mail:** Send electronic mail (email) to comments@CaliforniaWDM.org.
- **Postal Mail:** Send your comment to

California WDM, 2121 Broadway, P.O. Box 188797, Sacramento, CA 95818.

- **Public Comment Meeting:** Provide verbal comment at a virtual meeting to be held on February 8, 2024, from 4:00 PM - 7:00 PM. Details for participation will be posted on the project website at www.CaliforniaWDM.org/get-involved/ prior to February 8th. You may register for the public meeting at the above link, although registration is not required for participation in the public meeting. Registrants will receive an email reminder for the public meeting on the day of meeting, February 8, 2024.

Thank you for your participation in the process.

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California WDM
2121 Broadway
P.O. Box 188797
Sacramento, CA 95818

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Response to Comment Letter I4

srakestraw@charter.net
January 15, 2024

- I4-1** Thank you for your comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; the comment is noted for the record and no further response is required.

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Info CaliforniaWDM

From: Ken Burton <shrikethree@gmail.com>
Sent: Tuesday, January 16, 2024 3:19 PM
To: Info CaliforniaWDM
Subject: EIR/EIS comments

Table 1-2: Species names should be corrected as follows:

- Badger to American badger
- Pine martin to Pacific marten
- Spotted skunk to Western spotted skunk
- Feral swine to Wild boar
- Great-horned owl to Great horned owl

Table 1-3: Species names should be corrected as follows:

- Badger to American badger
- Beaver to American beaver
- Mule/black-tailed deer to Mule deer
- Cottontail rabbit to Cottontails (*Sylvilagus* spp.) (there are three species and I assume you do not have data on individual species)
- Porcupine to North American porcupine
- Feral swine to Wild boar
- Fox squirrel to Eastern fox squirrel
- Scrub jay to California scrub-jay (there are in fact three species of scrub-jay in California but I'm confident all the agricultural loss can be attributed to this one)

The species order in both tables is clearly a relic of a former alphabetical sorting approach and makes no sense. Better to sort them taxonomically, or perhaps in decreasing order of total financial impact.

The species included in these tables seem quite random and the lists are surely incomplete. \$107K in damage attributed to horned lark and nothing to yellow-billed magpie? Where are the mice? I have very little faith in the value of these data.

I5-1

Response to Comment Letter I5

Ken Burton
January 16, 2024

- I5-1** Thank you for your corrections. These suggestions have been incorporated into the final document as appropriate. As stated in Section 1.5.2.1 of the EIR/EIS, the species and damages listed include only those verified by WS-California from 2010 to 2019 and recorded in the California Management Information System database. The CDFA and WS-California recognize that not all wildlife damage in California is investigated and recorded by WS-California. The information in Section 1.5 of the EIR/EIS is intended to indicate the need for WDM, not to embody all monetary losses from wildlife in California. Furthermore, these losses do not include the amount of loss prevented by conducting WDM similar to that analyzed under Alternative 1 during those years. Losses would likely have been higher without this WDM.

Info CaliforniaWDM

From: Shanti Zinzi <theadvocat@yahoo.com>
Sent: Thursday, January 18, 2024 4:05 PM
To: Info CaliforniaWDM
Subject: Public comment for WS

To Whom It May Concern:

Thank you for the opportunity to provide public commentary.

As a Californian,

I would ask if the organization can provide

1) complete transparency of records for each case accessible to the public

I would request to always

2) document non lethal methodology which as stated in documents should be first line of action as stated in document (barring immediate public threat made by sound and experienced assessor) & make publicly accessible for each case

3) programs for wildlife predation prevention education requirements for all new and existing animal husbandry keepers

4) make community co-existence education tips available.

5)In cases such as Pt Reyes Tule elk culls, a democratic public vote of dairy farms vs wildlife/tule elk a should be implemented.

6)Provide access to transparent documentation of consultation with California tribal elders & representatives for all animals.

I6-1

Thank you,
 Sincerely,
 Shanti Zinzi

Response to Comment Letter I6

Shanti Zinzi
January 18, 2024

I6-1 The CDFA and WS-California recognize the public interest in implementing the Proposed Project/Proposed Action and the value of providing open access to Proposed Project/Proposed Action information. WS-California regularly makes data regarding their WDM activities (including non-lethal activities) publicly available. Requests for information that is not included in the information that WS-California makes publicly available can be made to the lead agencies (the CDFA and WS-California). Complete documentation of tribal consultations can be found within the EIR/EIS in Appendix E.

Please also refer to Section 1.2.1, Outside the Scope.

Info CaliforniaWDM

From: lin@willitsonline.com
Sent: Thursday, January 25, 2024 12:56 PM
To: Info CaliforniaWDM
Subject: Comment on California WDM Draft EIR/EIS

My general perception and experience with Wildlife Services is almost solely negative. I believe that Wildlife Services should be primarily an educational organization to help landowners and livestock raisers coexist with wildlife of all types. I have seen Wildlife Service personnel come to a property that had a bear tear open a bag of dog food and NOT tell the person that they should not leave dog food outside (along with bags of wet garbage). Instead, the bear was trapped in a drum trap and shot. There was no education, only eradication, and the attractants remained, to provoke another bear or raccoon or any other animal into an encounter on a front porch. I do not believe this is what the California taxpayer signed up to pay for or wants to pay for. Moreover, traps put on public and private land by Wildlife Services personnel killed and injured dogs and cats as well as native wildlife. I pray for a refocusing of Wildlife Services to in fact serve wildlife by educating people about attractants, deterrents, and proper livestock enclosures. This would be a worthy endeavor that will keep livestock and wildlife safe, not dead livestock from improper housing and dead wildlife from an opportunity that should not have been there in the first place. Thank you, Linnea Due, 2 Kenilworth Court, Kensington, CA 94707.

17-1

Response to Comment Letter I7

Linnea Due
January 25, 2024

- I7-1** The CDFA, WS-California, and county wildlife specialists provide technical assistance, including advice, information, education, and demonstrations. Education and other forms of technical assistance are described in Chapter 2 of the EIR/EIS, including non-lethal technical assistance. As stated in the EIR/EIS, non-lethal WDM is prioritized when appropriate and effective, including education.

Please also refer to Section 1.2.11, Alternatives.

Comment Letter I8

Info CaliforniaWDM

From: Judy Irving <films@pelicanmedia.org>
Sent: Saturday, February 3, 2024 1:41 PM
To: Info CaliforniaWDM
Subject: definition

Please explain what you mean by "WDM materials, technologies, and methods." What materials? What technologies? What methods?

I 18-1

Response to Comment Letter I8

Judy Irving
February 3, 2024

- I8-1** The services that the CDFA, WS-California, and county wildlife specialists may provide under the Proposed Project/Proposed Action and the alternatives are described in Chapter 2 of the EIR/EIS. Specific WDM methods and tools are described in Appendix C of the EIR/EIS.

Info CaliforniaWDM

From: Judy Irving <films@pelicanmedia.org>
Sent: Saturday, February 3, 2024 1:37 PM
To: Info CaliforniaWDM
Subject: definition

What do you mean by “wildlife damage management”? The term is opaque — do you mean damage to wildlife or damage from wildlife? And what do you mean by “management”? Killing animals? Making them go someplace else? Controlling their populations in other ways?

It does not help when confusing terms like these are used. Please translate these terms into plain English. You will get more public participation if people understand what you’re talking about. But maybe you don’t want public participation.

Judy Irving

I
19-1
I

Response to Comment Letter I9

Judy Irving
February 3, 2024

- I9-1** As stated in Section 1.1 of the EIR/EIS, WDM is the process of reducing damage associated with wildlife. This most often includes protection of agricultural resources, natural resources, property, and human health and safety.

Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Thursday, February 15, 2024 3:18 PM
To: Info CaliforniaWDM
Subject: Re: CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

Just to let you know. Appendix A - scoping report, Appendix D - Webinar Transcripts (October 13 and 27, 2020) - the recording for Oct 27 is exactly the same as the recording for Oct 13. Margot Lowe

I10-1

On Fri, Jan 12, 2024 at 3:29 PM California WDM <info@californiawdm.org> wrote:

[View this email in your browser](#)

CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

The California Department of Food and Agriculture (CDFA) and Wildlife Services-California (WS-California), a state office within the U.S. Department of Agriculture's (USDA) Animal Plant and Health Inspection Service (APHIS), have released the Draft California Wildlife Damage Management Environmental Impact Report and Environmental Impact Statement (EIR/EIS).

The Draft EIR/EIS can be accessed electronically at www.CaliforniaWDM.org/documents/.

To request a flash drive containing the Draft EIR/EIS, please fill out the form at the following link: <https://arcg.is/1izOvz>. The last day to request a flash drive is February 26, 2024.

The CDFA and WS-California invite public comment on the Draft EIR/EIS. A 60-day comment period will begin on January 12, 2024, and end on March 12, 2024. The CDFA and WS-California will evaluate comments on environmental issues received in response to the Draft EIR/EIS and will address comments in the Final EIR/EIS. All comments received will be available for public review as required and allowed by law. You may submit comments by either of the following methods:

- **Federal eRulemaking Portal:** Go to <https://www.regulations.gov/docket/APHIS-2020-0081>.
- **Electronic Mail:** Send electronic mail (email) to comments@CaliforniaWDM.org.
- **Postal Mail:** Send your comment to

California WDM, 2121 Broadway, P.O. Box 188797, Sacramento, CA 95818.

- **Public Comment Meeting:** Provide verbal comment at a virtual meeting to be held on February 8, 2024, from 4:00 PM - 7:00 PM. Details for participation will be posted on the project website at www.CaliforniaWDM.org/get-involved/ prior to February 8th. You may register for the public meeting at the above link, although registration is not required for participation in the public meeting. Registrants will receive an email reminder for the public meeting on the day of meeting, February 8, 2024.

Thank you for your participation in the process.

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California WDM
2121 Broadway
P.O. Box 188797
Sacramento, CA 95818

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Response to Comment Letter I10

Margot Lowe
February 15, 2024

- I10-1** The CDFA and WS-California thank the commenter for their attention to detail. This correction has been incorporated into the final document.

INTENTIONALLY LEFT BLANK

Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Saturday, February 17, 2024 2:14 PM
To: Info CaliforniaWDM
Subject: California Wildlife Damage Management Draft EIR/EIS

We humans are squeezing all other species off the face of the earth. As the human population expands, more and more forest, grasslands, wetlands and other communities are taken to meet the needs of the increasing human population. Agriculture has expanded into territories of cougars, grizzly bears and many other animals to the point that there is not enough space for wild animals. The U.S. and the state of California need population policies - how many people can live here and still have room for the animals?

I hate thinking of animals like cougars, for example, being shot and killed, especially when it's being paid for with my taxes!

I choose Alternative 5: No Project/Cessation of WS-California. The downside is that without WS people will 'take matters into their own hands' they will just shoot cougars or poison them with strychnine-laced as happened in the Temecula area.

Ranchers need to take more responsibility for protecting their livestock and not just rely on WS to shoot cougars. USFW and CDFW need to grow backbones and strictly enforce the laws protecting wildlife.

Respectfully
 Margot Lowe
 4834 Northerly St
 Oceanside CA
 92056-2101
 760 8427252

111-1

Response to Comment Letter I11

Margot Lowe
February 17, 2024

I11-1 Please refer to Section 1.2.11, Alternatives, and Section 1.2.7, Economics.

Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Saturday, February 17, 2024 1:38 PM
To: Info CaliforniaWDM
Subject: Re: CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

If one of the non-lethal alternatives is chosen, what would be done with, for example, cougars that have attacked and/or are attacking livestock? Margot Lowe I12-1

On Fri, Jan 12, 2024 at 3:29 PM California WDM <info@californiawdm.org> wrote:

[View this email in your browser](#)

CDFA and WS-California Announce Release of California Wildlife Damage Management Draft EIR/EIS

The California Department of Food and Agriculture (CDFA) and Wildlife Services-California (WS-California), a state office within the U.S. Department of Agriculture's (USDA) Animal Plant and Health Inspection Service (APHIS), have released the Draft California Wildlife Damage Management Environmental Impact Report and Environmental Impact Statement (EIR/EIS).

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- **Federal eRulemaking Portal:** Go to <https://www.regulations.gov/docket/APHIS-2020-0081>.
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California WDM, 2121 Broadway, P.O. Box 188797, Sacramento, CA 95818.

- **Public Comment Meeting:** Provide verbal comment at a virtual meeting to be held on February 8, 2024, from 4:00 PM - 7:00 PM. Details for participation will be posted on the project website at www.CaliforniaWDM.org/get-involved/ prior to February 8th. You may register for the public meeting at the above link, although registration is not required for participation in the public meeting. Registrants will receive an email reminder for the public meeting on the day of meeting, February 8, 2024.

Thank you for your participation in the process.

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2121 Broadway
P.O. Box 188797
Sacramento, CA 95818

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Response to Comment Letter I12

Margot Lowe
February 17, 2024

- I12-1** As stated within the analyses in Chapter 4 of the EIR/EIS, under the condition the CDFA, WS-California, or county wildlife specialists cannot provide lethal operational assistance, the immediate burden of providing WDM would be placed on the resource owner, other governmental agencies, private businesses, and/or private individuals.

INTENTIONALLY LEFT BLANK

Info CaliforniaWDM

From: Carol Crouch <bigtreez@comcast.net>
Sent: Tuesday, February 20, 2024 2:31 PM
To: Info CaliforniaWDM

Please enact Alternative 2 and stop using tax funded dollars to eliminate wild life. Adopt inhumane methods.

I I13-1

Carol Crouch
160 Stone Ridge Court
Murphys, CA 95247
209-401-8970

Response to Comment Letter I13

Carol Crouch
February 20, 2024

I13-1 Please refer to Section 1.2.11, Alternatives; Section 1.2.7, Economics; and Section 1.2.10, Humaneness.

Info CaliforniaWDM

From: Lee Zimmerman <zimmerman_lee@yahoo.com>
Sent: Tuesday, February 20, 2024 2:44 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Hi there,

I am emailing to strongly support Alternative 2 for the Wildlife Damage Management programs. Alternative 2 is the more humane, appropriate, endangered species friendly, and less costly approach to wildlife management.

I I14-1

Thank you for selecting Alternative 2.

I I14-2

Lee Zimmerman

Response to Comment Letter I14

Lee Zimmerman
February 20, 2024

I14-1, I-14-2 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: suzanne rogers <suzannedelzellrogers@gmail.com>
Sent: Tuesday, February 20, 2024 2:45 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I am writing to urge you to adopt Alternative 2 as the balanced plan to use non-lethal actions except to protect airports from wildlife-caused collisions with aircraft, to protect endangered species, and to protect humans and companion animals. I do not want the government to kill predators using inhumane methods in order to boost profits for ranchers, farmers, and other private interests. California takes the lead in so many areas. Let's let California take the lead in finding alternatives to inhumane killing of animals. Thank you for your time.

115-1

Response to Comment Letter I15

Suzanne Rogers
February 20, 2024

I15-1 Please refer to Section 1.2.11, Alternatives; Section 1.2.10, Humaneness; and Section 1.2.7, Economics.

Info CaliforniaWDM

From: bluebird7@mlode.com
Sent: Tuesday, February 20, 2024 2:46 PM
To: Info CaliforniaWDM
Subject: human actions re wildlife

As retired medical professional, birdwatcher, adopter of 7 older dogs over 2 decades, education director (7 years) for CSAS, wildlife caregiver for 8 years w/local rescue group and retired Naval Officer senior citizens who have been aware of the environmental issues for decades, it is again distressing to read that wildlife "services" and/or other such groups, continue to use as their MO the disposal of wildlife which has been deemed to \cause some human entity inconvenience!

I16-1

After all the new knowledge of late and continuing on, have we not yet even begun to learn to be the smarter being in these instances? Do commerce and convenience continue to dictate our values over God's other creatures, despite the protestations of some who claim to be "pro-life" yet ignore the horror of meat and poultry agri-business and other such unacceptable industries?

I16-2

After living in 5 large cities in three states over our careers, settling down in a rural setting was primary, w/trees, wildlife and natural sounds. Though many people seem oblivious to all the wonders of nature, the connections of all things, the fantastic array of birds and animals and butterflies, etc. and the laissez-fair attitude of many toward puppy mills and other sickening issues, shooting just to be "hitting something" for "sport" or bragging rights and such or because one has moved into the ancient territory of wildlife and not adapted to it, learning to enjoy and tolerate some nuisance activities by using common sense, information, contacting people who know and appreciate the wild and actually CARE, or working w/folks who DO care and understand - and it is 2024 - then continue practices to eliminate a species and possibly harming future populations or habitat, food or other necessity show just which species is more intelligent. We resent the **** out of any of our taxpayer dollars being used for ANY drastic action dealing w/wildlife with the possible exception of rabid critters or those so injured from other circumstances that the humane step to take is to gently put them down.

I16-3

Trapping, poisoning, neck restraints or other painful action is reprehensible. Public and planetary health involves ALL life and we, as the "top of the chain" must continue to learn and enable all other species to carry on their duties in concert w/humans to the greatest extent possible which should be increasingly successful as we learn and have empathy and common sense instead of reaching for the quickest method to dispense of the "problem" by cruel means or in any way which adds to the world-wide problems of species becoming extinct or heading in that direction!

I16-4

Larry & Loretta Bodiford
 POB 579
 Soulsbyville, CA 95372

Response to Comment Letter I16

Larry and Loretta Bodiford
February 20, 2024

I16-1, I16-2, I16-4 Please refer to Section 1.2.9, Non-Lethal WDM, and Section 1.2.10, Humaneness.

I16-3 Please refer to Section 1.2.7, Economics, and Section 1.2.9.

Info CaliforniaWDM

From: Richard Combs <combsrichard@sbcglobal.net>
Sent: Tuesday, February 20, 2024 3:24 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I am writing to express my support for Alternative 2 in the recent Wildlife Management EIR/EIS. I believe it provides adequate exceptions, such as for endangered species, airports, and humans. There are other situations where non-lethal methods have been successfully used to control undesirable predators or other wildlife. This should be the first approach for control. I prefer that my taxpayer dollars go towards non-lethal methods, and encourage you to adopt Alternative 2.

I17-1

Regards, Richard Combs Livermore, CA

Response to Comment Letter I17

Richard Combs
February 20, 2024

I17-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Robert Kelso <bobkelso@pacbell.net>
Sent: Tuesday, February 20, 2024 3:26 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I am writing to support Alternative 2 in this EIS. I do not think it is ecologically wise to kill predators except in rare cases where humans are endangered. I don't want my tax dollars paying for the killing of predators for the benefit of ranchers. Non-lethal means are preferable in almost all cases.

I18-1

Sincerely,
Bob Kelso
2836 Tice Creek Dr. #1
Walnut Creek, CA 94595

Response to Comment Letter I18

Bob Kelso
February 20, 2024

I18-1 Please refer to Section 1.2.7, Economics; Section 1.2.11, Alternatives; and Section 1.2.14 Biodiversity.

Info CaliforniaWDM

From: rivenes@sbcglobal.net
Sent: Tuesday, February 20, 2024 4:33 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Please choose alternative 2 when dealing with non-lethal controls.
Don Rivenes
Nevada County Ca

I 119-1

Response to Comment Letter I19

Don Rivenes
February 20, 2024

I19-1 Please refer to Section 1.2.9, Non-Lethal WDM, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: sifu berchtold <sifuberchtold@hotmail.com>
Sent: Tuesday, February 20, 2024 4:59 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments"

To whom it may concern:

I am in high favor of Alternative 2. Shooting, poisoning and otherwise killing wildlife with tax money is not acceptable unless absolutely necessary to protect humans and their pets.

I I20-1

Thank you,
kind regards,
Sifu Berchtold
Twain Harte, Ca
Sent from my iPhone

Response to Comment Letter I20

Sifu Berchtold
February 20, 2024

I20-1 Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: DeAnne Hart <hartbeat91@gmail.com>
Sent: Tuesday, February 20, 2024 5:30 PM
To: Info CaliforniaWDM
Subject: Wildlife "Control"

I live in the country surrounded by wooded hills and no nearby neighbors. I have lived here for fifty years enjoying the wildlife that appears - deer, coyotes, turkeys, bobcats, herons, squirrels and others. There has already been entirely too much 'control' of California wildlife as natural habitat is rapidly reduced. We humans have ruthlessly run over the rights of the state's first residents and it's time the government stopped this take-over.
DeAnne Hart, Watsonville area

I
I21-1

Response to Comment Letter I21

DeAnne Hart
February 20, 2024

- I21-1** The CDFA and WS-California thank the commenter for this comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.

Info CaliforniaWDM

From: Peggy Buckley <ploomis@sbcglobal.net>
Sent: Tuesday, February 20, 2024 9:54 PM
To: Info CaliforniaWDM
Subject: Comments - Wildlife Damage Management EIR/EIS

Re: Comments - Wildlife Damage Management EIR/EIS

I urge you to manage wildlife in California with the approach outlined in **Alternative 2**. This alternative is a balanced approach that will limit the lethal killing of wildlife while also making exceptions for human health and safety, endangered species protection, and airport wildlife hazard management. Not only are non-lethal methods more humane, but in listening to your online webinars, I heard multiple well-informed participants comment on the proven effectiveness of this type of management approach. As a California taxpayer, I do not want my dollars being used to unnecessarily kill wildlife. I hope California will set a new standard for how wildlife and ecosystems are managed.

I22-1

Thank you,

Peggy Buckley

Response to Comment Letter I22

Peggy Buckley
February 20, 2024

I22-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; Section 1.2.10, Humaneness; Section 1.2.11, Alternatives; and Section 1.2.14 Biodiversity.

Info CaliforniaWDM

From: Denise Combs <sagebrushheaven@gmail.com>
Sent: Tuesday, February 20, 2024 11:15 PM
To: Info CaliforniaWDM
Subject: California WDM Comments

Hello,

I am writing to plead with you to stop the killing of wildlife such as coyotes, foxes, and blue herons with taxpayer money for private farming/fishing industries, who consider these incredible and natural wildlife creatures "pests". Especially with inhumane tactics such as neck snares.

I23-1

I am writing in support of Alternative 2, limiting lethal wildlife management to protecting humans (and pets), protecting endangered species, and protecting air travel by limiting wildlife collisions at airports.

I23-2

I believe California should set a more humane standard for wildlife management in nature. I do not support taxpayer dollars going to current inhumane practices that benefit private industries.

Thank you,

Denise Combs

sagebrushheaven@gmail.com

Response to Comment Letter I23

Denise Combs
February 20, 2024

I23-1, I23-2 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; Section 1.2.10, Humaneness; and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Michael Molamphy <youreyesonlymj@yahoo.com>
Sent: Wednesday, February 21, 2024 8:23 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

California must stop wasting our money killing animals inhumanely to enhance profits for ranchers and farmers, with the exception of feral pigs. (shoot them).
Adopt alternative 2 , and stop using aircraft to kill coyotes.
Michael Molamphy, Lodi, CA

I
I24-1

Response to Comment Letter I24

Michael Molamphy
February 21, 2024

I24-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; Section 1.2.10, Humaneness; and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Susan Reichle <carpecircus@gmail.com>
Sent: Wednesday, February 21, 2024 8:48 AM
To: Info CaliforniaWDM
Subject: CA WM Comments

Hello,

I am writing about the latest WDM report. I urge you to adopt Alternative 2 using non-lethal means to manage wildlife when needed to protect humans, pets, endangered species, and air travel. Do not use tax payer dollars to benefit private interests.

I25-1

thank you,

Susan S. Reichle
Jamestown CA

Sent from my iPad

Response to Comment Letter I25

Susan Reichle
February 21, 2024

I25-1 Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Joan Hamilton <joanham@gmail.com>
Sent: Wednesday, February 21, 2024 9:31 AM
To: Info CaliforniaWDM
Subject: Wildlife Damage Control

I support Alternative 2 in your EIR/EIS on the environmental impacts of wildlife damage management programs. It's long past time to focus on non-lethal actions and stop using taxpayer dollars to kill wildlife already stressed by climate changes.

Sincerely,

Joan Hamilton

--

Joan Hamilton
510-990-6391

Email: Joanham@gmail.com

Web: audiblemountdiablo.com

I26-1

Response to Comment Letter I26

Joan Hamilton
February 21, 2024

I26-1 Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Thomas Harrington <thomasharrington266@gmail.com >
Sent: Wednesday, February 21, 2024 9:56 AM
To: Info CaliforniaWDM
Subject: Ca WDM Comments

I strongly support Alternative 2 in the proposal. Non-lethal means should be used except for the exceptions listed.

I I27-1

Thomas Harrington

Response to Comment Letter I27

Thomas Harrington
February 21, 2024

I27-1 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Mmm Meyer <mmmlizard@icloud.com>
Sent: Wednesday, February 21, 2024 9:57 AM
To: Info CaliforniaWDM
Subject: Support for alternative #2

Do not use tax dollars to kill wildlife.
Alternative #2 is the best way.

I 128-1

Mmm

Response to Comment Letter I28

Mmm Meyer
February 21, 2024

I-28-1 Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: John Kinnear <johnkinnear@yahoo.com>
Sent: Wednesday, February 21, 2024 11:27 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Clearly, the current practices of Wildlife Services_CA are not in the best interest of communities of the State Of California. After reviewing and discussing the Aalternatives proposed it seems to me that Alternative 2 offers the most realistic beginning to the process of minimizing unnecessary damage to our natural environmental ecology and to maintain protection to all citizens of California.

I strongly recommend the adoption of Alternative 2 to the EIR/EIS and recommend that a yearly report be made to The People of California outlining how changes in current practices are affecting both the wildlife and citizens of California.

John Kinnear, Citizen of California for 78+ years.

I29-1

Response to Comment Letter I29

John Kinnear
February 21, 2024

I29-1 Please refer to Section 1.2.5, Transparency, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Kathy Howard <kathyhoward@earthlink.net>
Sent: Wednesday, February 21, 2024 1:18 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments - in support of Alternative 2

I support Alternative 2.

I support restricting management of wildlife to non-lethal actions. We much have better ways of dealing with the wildlife whom we have driven from their native homes than using inhumane methods such as neck snares. I am sure that all of you have at some time or other had a pet dog or cat; would you want them to be tortured in this manner by an angry neighbor who found their presence to be inconvenient?

I certainly do not want my tax dollars to go towards killing predators or other wildlife. California must set a new standard for managing wildlife that does not involve cruel methods.

Katherine Howard
San Francisco

I30-1

Response to Comment Letter I30

**Kathy Howard
February 21, 2024**

I30-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; Section 1.2.10, Humaneness; and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: tom suk <tom_suk@hotmail.com>
Sent: Wednesday, February 21, 2024 1:35 PM
To: Info CaliforniaWDM
Subject: Comments on CA WDM EIR/EIS

Hello. I am writing to comment on the EIR/EIS for "wildlife damage management" in California. You have been killing, maiming and torturing wildlife for far too long. Our family respectfully requests that you STOP shooting predators or using snares, poisons or other inhumane methods to kill, maim and torture wildlife. We urge you to select Alternative 2, to focus on non-lethal methods to manage wildlife. Do you have the patience and professionalism to stop relying on easy, lethal methods to kill wildlife whenever they may bother someone or affect their purely financial interests? Please honestly and conscientiously try Alternative 2 for a decade or so, then come back and tell us what you learned. Thank you for considering our views. tomas suk, south lake tahoe, CA.

I31-1

I31-2

Response to Comment Letter I31

**Tomas Suk
February 21, 2024**

- I31-1** Please refer to Section 1.2.9, Non-Lethal WDM, and Section 1.2.10, Humaneness.
- I31-2** Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Sharon Hagen <sjhagen@sbcglobal.net>
Sent: Thursday, February 22, 2024 12:12 PM
To: Info CaliforniaWDM
Subject: Comment on California WDM Draft EIR/EIS

I strongly oppose the use of lethal methods to control predation or other harms by wildlife on any public lands. There are many ways to deter unwanted animals from fencing, use of dogs and many other mitigation and harassment techniques. We need predators to keep a balance in nature and assist in restoring wild lands as well as appreciating their intrinsic value. I do not want my tax dollars going to killing any wild animal and am willing to pay higher costs in food if that is the result. Private landowners are aware of the risk they take in farming or ranching near wildlife areas and open habitat and shouldn't rely on public agencies to help them out if an animal bothers their property. That said, I don't object to the agency providing information and assist with non-lethal means of predator control.

132-1

Thank-you
 Sharon Hagen
 sjhagen@sbcglobal.net

Response to Comment Letter I32

Sharon Hagen
February 22, 2024

I32-1 Please refer to Section 1.2.7, Economics; Section 1.2.8, Public Lands; and Section 1.2.9, Non-Lethal WDM.

Info CaliforniaWDM

From: S Schaffner <sheryl@jahiel.net>
Sent: Thursday, February 22, 2024 8:27 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Dear Madam or Sir;

I strongly urge you to select Alternative 2, limiting lethal wildlife management to protecting humans and pets, protecting endangered species, and limiting wildlife collisions at airports.

This alternative is the only one that is calibrated to fulfill the objectives of the project, while not resulting in avoidable significant impacts. Predators play a critical role in ecosystem health, keeping the prey species in check and promoting the vitality of all species -- including humans and their businesses like cattle and fisheries -- by supporting a robust and balanced food chain: from soil, to grasses, to herbivores, insects and birds.

Unnecessarily killing predators to serve the vocal needs of a small minority of the human population creates otherwise avoidable impacts to the environment, and would impact all Californians negatively. I urge you to confine lethal tactics to only those situations set out in Alternative A.

Thank you.

- Sheryl Schaffner
 650-833-9060

133-1

133-2

133-3

Response to Comment Letter I33

Sheryl Schaffner
February 22, 2024

I33-1, I33-2, I33-3 Please refer to Section 1.2.11, Alternatives, and Section 1.2.14, Biodiversity.

Info CaliforniaWDM

From: duane cornell <sharkycornell@gmail.com>
Sent: Friday, February 23, 2024 6:41 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

To whom it may concern:

I would like to express my opposition to the lethal and inhumane methods used to eliminate many wildlife species considered "pests" by some groups and organizations. All wildlife has importance to the ecosystem as a whole, and targeting specific creatures for economic reasons or the possibility of a potential threat cannot be beneficial in the long run.

I support Alternative 2 as a reasonable approach to managing how California treats wildlife in the future.

Thank you.

Duane D. Cornell
 P.O. Box 2042
 Columbia, CA 95310
sharkycornell@gmail.com

I34-1

I34-2

Response to Comment Letter I34

Duane D. Cornell
February 23, 2024

I34-1, I34-2 Please refer to Section 1.2.7, Economics; Section 1.2.11, Alternatives; and Section 1.2.14, Biodiversity.

Info CaliforniaWDM

From: Alan Carlton <carltonal@yahoo.com>
Sent: Friday, February 23, 2024 7:55 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I support Alternative 2; stop killing innocent wildlife

I 135-1

Alan Carlton
408 Sunset Rd.
Alameda CA 94501
(510) 759-5387

Response to Comment Letter I35

Alan Carlton
February 23, 2024

I35-1 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Earleen Overend <eowp@comcast.net>
Sent: Friday, February 23, 2024 11:04 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I am writing to send my strong support of Alternative 2, which limits lethal wildlife management to protecting humans and pets, protecting endangered species, and protecting air travel limiting wildlife collisions at airports. There is no other reason to use lethal means to kill wildlife.

Please support alternative 2.

Earleen Overend

I
I36-1

Response to Comment Letter I36

Earleen Overend
February 23, 2024

I36-1 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Friday, February 23, 2024 12:34 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Thank you for the opportunity to comment on this important issue;

I support Alternative 2, which limits lethal wildlife management to protecting humans and pets, protecting endangered species, and protecting air travel by limiting wildlife collisions at airports.

I37-1

Our native predators have been exterminated, tortured and exposed to human-generated destructive chemicals, traps and hunts for too long. We've suffered, as a result, with imbalanced pest and deteriorated habitat. It is time for us to learn how to live with nature, if we want to preserve our own quality of life.

I37-2

I don't support the use of taxpayer dollars to kill predators or other wildlife. California should set a new standard for how wildlife and nature are managed. Let's start with Alternative 2.

I37-3

**Pam Nelson
 Warner Springs, CA**

Response to Comment Letter I37

Pam Nelson
February 23, 2024

- I37-1** Please refer to Section 1.2.11, Alternatives.
- I37-2** Please refer to Section 1.2.14, Biodiversity.
- I37-3** Please refer to Section 1.2.7, Economics, and Section 1.2.11.

Info CaliforniaWDM

From: Gordon Nathan <gordienathan@outlook.com>
Sent: Saturday, February 24, 2024 10:34 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Wildlife Services-CA

Thank you for providing a forum for allowing public comment on the recently completed EIR/EIS draft document on Wildlife Damage Management (WDM).

138-1

While all aspects of the draft report are of vital importance to everyone, I would like to express my views specifically on Draft EIR/ EIS, Alternate #2 under the heading Non-Lethal Operational WDM. The Federal and State Government agencies charged with protecting our natural resources seem to operate on different wave lengths when it comes to the natural resources of our beautiful country. Some agencies are charged with issuing Depredation Permits allowing the killing of our wild animals. Some agencies perform the actual killing. While there is no question that there are instances that an animal that causes damage or injury to people and of a lesser nature, to crops or other animals, endangered or not, Alternative 2 seems to me to be the best action to take and still allow the Wildlife Service-CA to provide the needed service but not provide "lethal" means by way of "assistance". Except, of course, in cases where health and human safety are involved along with the other special circumstances as outline in Alternative 2.

138-2

The United States has a long history, some good and some bad of "managing " wildlife. This is an opportunity to continue to manage wildlife in a way that is humane. This is an opportunity to stop killing natural predators using barbaric methods such as leg traps that severely injure and prolong death, snares that strangle, poison, or any other means to kill but causes the animal untold pain and suffering. I don't believe that my tax dollars, nor any taxpayer should support the killing of animals by its government.

138-3

Alternative 2 is a way that will continue to offer expert assistance from government agencies charged with helping to maintain the natural environment do their jobs, but it will open the door for humane means of controlling wildlife that cause problems and not suffer at the hands of those charged with helping to manage the wildlife around us. After all, we humans have been encroaching on the habitat that the animals have lived in for eons. Let's not make the animals suffer in our efforts to "manage" what is their environment too.

138-4

Alternative 2 is my choice for implementation as part of any changes in Wildlife Damage Management.

Respectfully submitted,

Gordon Nathan

Moraga, CA

Response to Comment Letter I38

Gordon Nathan
February 24, 2024

- I38-1** The CDFA and WS-Services thanks the commenter for this comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.
- I38-2** Please refer to Section 1.2.11, Alternatives.
- I38-3, I38-4** Please refer to Section 1.2.10, Humaneness; Section 1.2.7 Economics; and Section 1.2.11.

Info CaliforniaWDM

From: davepbe@gmail.com
Sent: Saturday, February 24, 2024 2:09 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Thank you for the opportunity to comment on the plan for dealing with wildlife. I strongly support Alternative 2 as the fairest and most balanced choice. I would very much appreciate your making that choice. I love the wilderness, have spent much time there, and want to see the wildlife there protected.

I
I39-1

Sincerely, Dave Jenkins



Virus-free. www.avast.com

Response to Comment Letter I39

Dave Jenkins
February 24, 2024

I39-1 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Sonya <sonya.sukalski@comcast.net>
Sent: Saturday, February 24, 2024 7:26 PM
To: Info CaliforniaWDM
Subject: Public comment: Alternative 2 urged for Wildlife Management

Hi,

I urge state and federal agencies to use non-lethal methods to control wildlife only when people or pets are endangered. Using taxpayer money to kill wildlife to keep them away from livestock is unacceptable.

We need a new standard for how wildlife and nature are managed in California that respects endangered species as well as people and pets. I urge you to adopt Alternative 2.

Sincerely,

Sonya Sukalski

3899 Brookdale Blvd.

Castro Valley, CA 94546

I40-1

Response to Comment Letter I40

Sonya Sukalski
February 24, 2024

I40-1 Please refer to Section 1.2.7, Economics; Section 1.2.11, Alternatives; and Section 1.2.16, T&E Species.

Info CaliforniaWDM

From: Red Grifster <redgrifster.bmg@gmail.com>
Sent: Sunday, February 25, 2024 1:34 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

I am writing this to support Alternative 2 in this EIR/EIS document that proposes using non-lethal methods in dealing with predation in California. The presence of predators has been proven to be beneficial to balanced ecosystems. The extermination of predators had had many negative effects on ecosystems, such as habit destruction by herbivores (such as deer) to riparian areas and other native vegetation. I urge you to adopt an approach that makes lethal methods a last resort in managing predator populations. The indiscriminate use of snares and other methods that do not discriminate between species, and problem vs. non problem animals, should not be allowed to continue. Thank you for your consideration.

I41-1

Mike Griffin
 925-454-8972.

Response to Comment Letter I41

Mike Griffin
February 25, 2024

I41-1 Please refer to Section 1.2.9, Non-Lethal WDM; Section 1.2.11, Alternatives; Section 1.2.10, Humanness; and Section 1.2.14, Biodiversity.

Info CaliforniaWDM

From: Peggy Sells <peggysellsphotography@gmail.com>
Sent: Sunday, February 25, 2024 5:13 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Hello,

I am writing to share my thoughts as to why I do NOT want government agencies killing predator animals or any other wildlife. This is absurd. I live in a very rural area of Tuolumne County CA. I live around thousands of acres of cattle grazing. We deal with so many pests like Ground Squirrels, Gophers, Snakes and so many other natural wildlife animals that make it extremely difficult to even have a garden or fruit trees. I find out that our government agency actually goes out and kills the predators that keep nature in check so the ranchers can raise their cattle easily. Where does this all stop? Will this same agency come to my property and kill all the Squirrels, Gophers and Deer that are ruining my agricultural life because the predators of my pests are being killed.

I42-1

I **DO NOT** want my tax dollars being used to kill predator animals or ANY other wildlife.

I understand there is another option **Alternative 2** and I strongly support that as a balanced plan.

I42-2

Thank you,
 Peggy Sells

Response to Comment Letter I42

Peggy Sells
February 25, 2024

- I42-1** Please refer to Section 1.2.14, Biodiversity.
- I42-2** Please refer to Section 1.2.7, Economics, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Gary Bailey <tigergary@earthlink.net>
Sent: Sunday, February 25, 2024 5:49 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Dear Sirs / Madams:

Please support alternative 2. Wildlife Services' job should be to help ranchers, farmers, etc. to protect their livestock with non lethal methods. Taxpayers' money should not be used to kill wildlife, except in situations described in alternative 2. Public funds could be used to help implement non lethal predator control.

I43-1

Thank you for your consideration,

Gary Bailey

Response to Comment Letter I43

Gary Bailey
February 25, 2024

I43-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: John Keller <jakestay@gmail.com>
Sent: Thursday, February 29, 2024 3:50 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Hi,

I am writing to voice my support for Alternative 2 of the Wildlife Damage Control EIR.

I believe that our government should avoid killing wildlife unless we/they have a strongly compelling reason to do so. I particularly oppose cruel and inhumane methods of killing animals. Alternative 2 strikes a good balance between protecting wildlife and protecting human needs. I support the reintroduction and protection of predator species in our wildlands, to as great an extent as is feasible in our highly-developed state.

Again, I support Alternative 2 as the best choice for this EIR.

Thank you,
John Keller
1435 Elm St
El Cerrito CA 94530

I44-1

Response to Comment Letter I44

John Keller
February 29, 2024

I44-1 Please refer to Section 1.2.10, Humaneness; Section 1.2.11, Alternatives; and Section 1.2.14, Biodiversity.

Info CaliforniaWDM

From: Dr. Rob Schaeffer <robsch44@gmail.com>
Sent: Saturday, March 2, 2024 12:40 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

We are writing to express our strong support for Alternative 2. Limiting lethal wildlife management best expresses our values and goals. Wildlife, especially top of the food chain predators such as foxes and coyotes, are our brothers and sisters with whom we share this planet. Only ranchers, farmers, and others seeking to increase their profit margins would ever describe these as pests. We believe that the exceptions in Alternative 2, which allow LIMITED and CIRCUMSCRIBED lethal management to protect humans, endangered species, etc. are unfortunate but necessary. But beyond those exceptions, there are many other non-lethal alternatives for management that are more humane than killing. Thank you for taking into consideration our input.

I45-1

Drs. Rob and Helene Schaeffer
 Clinical Psychology, Forensic Psychology, Applied Psychophysiology
 3848 McHenry Avenue, suite 135, #256
 Modesto, California 95356
 (209) 985-6641

Response to Comment Letter I45

Drs. Rob and Helene Schaeffer
March 2, 2024

I45-1 Please refer to Section 1.2.7, Economics; Section 1.2.10, Humaneness; Section 1.2.11, Alternatives; and Section 1.2.14, Biodiversity.

Info CaliforniaWDM

From: Renee Hendry <rhendry@yahoo.com>
Sent: Sunday, March 3, 2024 11:10 AM
To: Info CaliforniaWDM
Subject: CA WDM Comments

Dear Sir or Madam:

I would like to submit comments on the proposal to control problem wildlife. For many years, Mountain Lions were thought to be endangered. If a rancher complained that they were killing livestock, a wildlife "hunter" would come to the property to euthanize the animal. I live in the Sonora area of Tuolumne County. For the past couple of years, Mountain Lions have been roaming our residential neighborhoods killing household pets. Photos of these predators are constantly being shown on Nextdoor neighborhood site and Facebook. Why is it that a rancher can have help protecting their livestock while dangerous Mountain Lions are allowed to roam our residential neighborhoods? I would like to respectfully request more management of Mountain Lions in the Sonora area. Also, the Turkey population is out of control in the Sonora area. Just ten years ago I would never see a Turkey in my neighborhood. Now, flocks of over 20 birds roam my neighborhood destroying plants, eating all the lizards, frogs and other species they find and leaving piles of excrement for us to track into our homes. I respectfully request more management to reduce the population of wild Turkeys. Thank you for your time and attention to this matter.

Renee Hendry
 20627 Upper Hillview Drive
 Sonora, Ca. 95370

Sent from my iPad

I46-1

I46-2

Response to Comment Letter I46

**Renee Hendry
March 3, 2024**

I46-1, I46-2 Management of mountain lion populations in California is under the authority of the California Department of Fish and Wildlife and is outside the scope of this EIR/EIS. WS-California, the CDFA, and county wildlife specialists only lethally remove mountain lions when a depredation permit has been issued by the California Department of Fish and Wildlife or public safety is at risk.

Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Sunday, March 3, 2024 12:04 PM
To: Info CaliforniaWDM
Subject: CA WDM comments

Why should the government kill wildlife?

I can understand that birds in airports are a threat to people flying and I would hope that methods other than killing would be used to eliminate the threat whenever possible.

I can understand that occasionally wild animals are a direct threat to humans and must be killed if they cannot be trapped and relocated, or dealt with in other ways.

I can understand that in order to save certain endangered species, their predators must be killed – the price to be paid to save the species.

But I cannot understand why I, as a taxpayer, should support killing predators of livestock. The underlying problem of course is that the U.S. is overpopulated; the U.S needs a population policy – how many people can live here and still have enough space and resources for the wildlife with whom we the share the land? In the early days of our country, there was plenty of wildlife – killing a predator or two to save your livestock or your crop did not severely affect the population. Fast-forward to today – where we humans have taken up all of the space and habitat, and have not left enough for wildlife. Generally speaking, wildlife has been pushed to its limit- it cannot be pushed back any farther without threatening the continued existence of the species. The most suitable land for farming and ranching has been taken already. As the human population increases, increasing the demand for food and other resources, farms and ranches have pushed into more marginal areas, increasing the risk of encounter with predators.

There are risks to every endeavor. Farmers and ranchers are entrepreneurs; they take risks to make a profit. As a general principle, a person should pay for what

147-1

147-2

he or she uses. People who eat meat, should pay for all the costs of the meat. If a farmer or rancher loses an animal or crop to wildlife – that is part of the cost of raising that animal or crop – and it should be passed on to the consumer. Farmers and ranchers in marginal areas have more risks of losing a crop or animal to predators; but we have pushed wildlife back as far as it can go, without losing the species.

I47-2
Cont.

Why should my taxes be used to kill the wildlife that I love and cherish? Answer, they shouldn't. Farmers and ranchers should do everything they can to avoid wildlife predations; but as a practical solution, when it has been determined that the farmer or rancher has taken every precaution to prevent loss, if it is absolutely necessary to kill the animal then Wildlife Services – the professionals should do it.

You mention in your analysis that "Alternative 2 would be inconsistent with WS-California's mission to protect agricultural (and natural) resources and property/infrastructure". The mission, the law, should be changed. Times have changed. People's values have changed. The mission, the law, the EIR/EIS you have provided look at things only from an economical perspective – money. There are other considerations; wildlife has value, in and of itself, aside from any benefits it provides to humans.

I47-3

I wish there were no need to kill wildlife, any time; however, considering things from a practical viewpoint, Alternative 2 in your analysis, is the best alternative.

I47-4

Respectfully
Margot Lowe
4834 Northerly Street
Oceanside CA 92056

Response to Comment Letter I47

Margot Lowe
March 3, 2024

I47-1, I47-2 Please refer to Section 1.2.7, Economics.

I47-3, I47-4 Changing federal policy would be an act of Congress and is outside the scope of this EIR/EIS. Please also refer to Section 1.2.11, Alternatives.

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Info CaliforniaWDM

From: Margot Lowe <margotlowe1@gmail.com>
Sent: Sunday, March 3, 2024 12:25 PM
To: Info CaliforniaWDM
Subject: Comments on California Wildlife Damage Management Draft EIR/EIS

Why should the government kill wildlife?

I can understand that birds in airports are a threat to people flying and I would hope that methods other than killing would be used to eliminate the threat whenever possible.

I can understand that occasionally wild animals are a direct threat to humans and must be killed if they cannot be trapped and relocated, or dealt with in other ways.

I can understand that in order to save certain endangered species, their predators must be killed – the price to be paid to save the species.

But I cannot understand why I, as a taxpayer, should support killing predators of livestock. The underlying problem of course is that the U.S. is overpopulated; the U.S needs a population policy – how many people can live here and still have enough space and resources for the wildlife with whom we the share the land? In the early days of our country, there was plenty of wildlife – killing a predator or two to save your livestock or your crop did not severely affect the population. Fast-forward to today – where we humans have taken up all of the space and habitat, and have not left enough for wildlife. Generally speaking, wildlife has been pushed to its limit- it cannot be pushed back any farther without threatening the continued existence of the species. The most suitable land for farming and ranching has been taken already. As the human population increases, increasing the demand for food and other resources, farms and ranches have pushed into more marginal areas, increasing the risk of encounter with predators.

There are risks to every endeavor. Farmers and ranchers are entrepreneurs; they take risks to make a profit. As a general principle, a person should pay for what

I48-1

I48-2

he or she uses. People who eat meat, should pay for all the costs of the meat. If a farmer or rancher loses an animal or crop to wildlife – that is part of the cost of raising that animal or crop – and it should be passed on to the consumer. Farmer and ranchers in marginal areas, have more risks of losing a crop or animal to predators; but we have pushed wildlife back as far as it can go, without losing the species.

I48-2
Cont.

Why should my taxes be used to kill the wildlife that I love and cherish? Answer, they shouldn't. Farmers and ranchers should do everything they can to avoid wildlife predations; but as a practical solution, when it has been determined that the farmer or rancher has taken every precaution to prevent loss, if it is absolutely necessary to kill the animal then Wildlife Services – the professionals should do it.

You mention in your analysis that "Alternative 2 would be inconsistent with WS-California's mission to protect agricultural (and natural) resource and property/infrastructure". The mission, the law, should be changed. Times have changed. People's values have changed. The mission, the law, looks at things only from an economical perspective – money. There are other considerations; wildlife has value, in and of itself, aside from any benefits it provides to humans.

I48-3

I wish there were no need to kill wildlife, any time; however, considering things from a practical viewpoint, Alternative 2 in your analysis, is the best alternative.

I48-4

Response to Comment Letter I48

Margot Lowe
March 3, 2024

I48-1, I48-2 Please refer to Section 1.2.7, Economics.

I48-3, I48-4 Changing federal policy would be an act of Congress and is outside the scope of this EIR/EIS. Please also refer to Section 1.2.11, Alternatives.

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Info CaliforniaWDM

From: Judith Shimer <jmshimer@att.net>
Sent: Monday, March 4, 2024 2:43 PM
To: Info CaliforniaWDM
Subject: CA WDM Comments

To Whom It May Concern:

I am writing to support **Alternative #2** for **Wildlife Damage Management in California**.

I do not believe in continuing to sanction government killing of potential predators by such means as trapping, helicopter shooting, poisoning, etc. as has been done in the past. These are inhumane tools in dealing with predators and affect many more animals that are not threatening livestock or people.

By adopting **Alternative #2**, California can lead the nation in intelligent, humane ways of managing predator problems.

Thank you for considering my thoughts in your decision.

Judith M. Shimer



Virus-free. www.avast.com

I49-1

Response to Comment Letter I49

Judith M. Shimer
March 4, 2024

I49-1 Please refer to Section 1.2.10, Humaneness, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Richard Anderson <andersonr@yosemite.edu>
Sent: Thursday, March 7, 2024 2:46 PM
To: Info CaliforniaWDM
Subject: Comment on CALIFORNIA WILDLIFE DAMAGE MANAGEMENT PROJECT

I am a retired biology professor in Modesto, CA.

I have read through the CALIFORNIA WILDLIFE DAMAGE MANAGEMENT PROJECT. <https://californiawdm.org/>
<https://californiawdm.org/wp-content/uploads/documents/draft-docs/California%20WDM%20Draft%20EIR-EIS.pdf>

I50-1

I am very concerned with the unintended effects of traps, poisons, and other lethal techniques that have been used to decrease wildlife damage to human economic activities in the past.

I50-2

Of the 5 alternatives considered, Alternative 2 seems most likely to evolve a healthy balance between protecting farming and residential safety, and maintaining the strength of the natural services that are so important to sustain our lives.

I50-3

- Richard Anderson 209-529-5182

Response to Comment Letter I50

Richard Anderson
March 7, 2024

- I50-1** Thank you for your comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.
- I50-2** Please refer to Section 1.2.9, Non-Lethal WDM; Section 1.2.10 Humaneness; and Section 1.2.13 Chemical WDM.
- I50-3** Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: Patrick McGinnis <patrick.mcginnis1@gmail.com >
Sent: Friday, March 8, 2024 8:23 AM
To: Info CaliforniaWDM
Subject: CA Wildlife damage control

I would like to voice my support for Alternative 2 for the proposed revision of wildlife damage control.
As a taxpayer I support non-lethal methods of controlling predators and wildlife that may find
their way into human habitat.
California has a chance to become the nation's leader in how wildlife is managed.
It's time to set a new standard. Make us proud, not vilified.
Sincerely,
Patrick McGinnis
Jamestown, CA 95327

I
I51-1
I

Response to Comment Letter I51

Patrick McGinnis
March 8, 2024

I51-1 Please refer to Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: barbrivenes@gmail.com
Sent: Saturday, March 9, 2024 3:06 PM
To: Info CaliforniaWDM
Subject: Wildlife Management concerns

Greetings,

I am writing in support of Alternative 2 which goes a long way to protect our dwindling wildlife from the over zealous use of snares and other means of harmful equipment used to deter predation. "Deter" does not mean using equipment that will kill or maim harmless animals. Alternative 2 will reduce the numbers of harmless animals killed.

Thank you for consideration of my concerns,

Barbara Rivenes

Grass Valley CA

Sent from [Mail](#) for Windows

I 152-1

Response to Comment Letter I52

**Barbara Rivenes
March 9, 2024**

I52-1 Please refer to Section 1.2.10, Humaneness, and Section 1.2.11, Alternatives.

Info CaliforniaWDM

From: John Ullcott <ullcott@yahoo.com>
Sent: Monday, March 11, 2024 5:49 AM
To: Info CaliforniaWDM
Subject: Official Comment on CA Wildlife Damaga Management Report

John Ullloth
 PO Box 7232
 Van Nuys, CA 91409
 ullcott@yahoo.com

CALIFORNIA WILDLIFE DAMAGE EIR/EIS
 Email: info@CaliforniaWDM.org
 DEADLINE: 3/12/2024

To Whom It May Concern,
 Thank for the opportunity to submit Official Comment:

RE: IN GENERAL
 ADOPT THE EA'S ALTERNATIVE 2 OR ALTERNATIVE 3.
 It's high time Wildlife Services to stop working for the livestock industry at the expense of mass-murdering native wildlife- esp. that which is beneficial, threatened & endangered.

HOW DID WE GET HERE?

Grazing cattle or sheep to take advantage of publicly-owned native wildlands of sparse grasses in the dry west is a shame: filling sparse grazing allotments with slow farm animals bred to be docile, then inserting them into our charismatic top predators' native habitat (who have nowhere else to go)... expecting them to devour something else- (since the allotment's driven out other animals, what?) weeds? Mice? That's employing magical thinking, because his digestive tract cannot process that? Putting domestic animals in harm's way on public lands in CA is putting an "attractive nuisance," an entrapment, in front of a top- (or meso-)predator... & as he eats what's obviously put in front of his home on the range, he gets a death sentence... and should her clan thrive from bringing such farm-animal meat to young back to the den, even more of her family members will get shot or poisoned in the next season, though the rancher may be compensated for his losses.

WHERE COULD WE GO INSTEAD?

Why is there is no mechanism to reintroduce native buffalo *en masse*- to their native places... buffalo who plough up, yet don't damage rangeland & watercourses as cattle do... buffalo which could also be taken in quantity for steaks/ BBQ burgers/ jerky) by converting government land & retiring grazing allotments. A portion of plains bison (*Bison bison*) original range was the far northeast corner of CA; Instead of asking 1st Nations people to comment on & (bless?) your ways of culling to the advantage of farm animals in private hands, what about putting out an Request For Proposal (RFP) to tribes for converting grazing allotments for buffalo herds, with "takings" managed for sustainability by 1st Nations tribes for their use, some sold to the public, & some shared, without taking offense or issuing a death sentence, to sustain wildlife?... Or why not put out an RFP to First Nations to manage Central Valley/ foothills' native Tule elk herds (*Cervus canadensis nannodes*) that might likewise be a better idea for grazing allotments.

RE: RANDOM HUMAN CULLING OF WILDLIFE IMPOVERISHES BIODIVERSITY ESSENTIAL FOR ECOSYSTEM SUSTAINABILITY. Unlike a top predator chasing prey, catching mostly the older,

I53-1

I53-2

weaker, and young when its parents are slacking, human culling does not advance “the survival of the fittest” (a.k.a. Law of the Jungle) especially when the Wildlife Service uses (and proposes to keep on using) cruel gear like body-gripping traps & neck snares, releasing fumigants into dens & burrows, and the indiscriminate air war on animals rundown by planes & choppers. Wildlife Services should not be using anyone's tax dollars to kill wildlife like that.

THE WILDLIFE SERVICE CULLING PROGRAM IS AT ODDS WITH CALIFORNIA'S ENDANGERED GRAY WOLF (*Canis lupus*) POPULATION: As the federal Endangered Species Act (ESA) requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to California's wolves. The Service can't rely on prior, outdated information to build policy on when California had only 1 wolf pack of 6 individuals (the Lassen pack); when today's reality is there are 7 wolf packs in the state with 45-50 individuals, inhabiting locations far from the original Lassen pack, including Modoc, Nevada, Sierra, Siskiyou, Tehama, & Tulare Counties.

RE: TAKINGS OF (2 DIFFERENT) NATIVE RED FOXES SUBSPECIES, CEQA & NEPA FINDINGS ARE INCORRECT- I was interested in the fox, but... THIS MAY ALSO BE TRUE OF OTHER SPECIES-RELATED CEQA & NEPA RATINGS YOU PROPOSE, IF THEY ARE BASED ON THE SAME LOGICAL SHORT-CIRCUIT: BY FAILING TO DISTINGUISH NUMERICALLY BETWEEN THE INTRODUCED NON-NATIVE RED FOX (*Vulpes vulpes*) VS. NATIVE SIERRA NEVADA RED FOX (*Vulpes vulpes necator*), & NATIVE SACRAMENTO VALLEY RED FOX (*Vulpes vulpes patwin*), INSTEAD BY LUMPING ALL 3 SPECIES' POPULATIONS TOGETHER TO EVALUATE SURVIVAL IN THE FACE OF YOUR CULLING... THE ONLY CONCLUSION POSSIBLE FROM THIS LUMPING IS OF CULLING'S COMBINED IMPACT ON SURVIVAL OF THE COMBINED *Vulpes*-FAMILY... WHICH UNDERESTIMATES THE POSSIBILITY OF EXTINCTIONS OF EITHER NATIVE RED FOX SPECIES (= *V. v. necator*, OR *V. v. patwin*) WHOSE POPULATIONS ARE GEO-SEPARATE, & DRAMATICALLY LOWER IN POPULATION THAT RISK EXTINCT IN THE FACE OF HUNTING, ROADKILL, & DISEASES/ POISON ACCUMULATION FROM PREY! WORSE THAN THAT, YOUR LUMPED FIGURE TELLS YOU NOTHING BECAUSE IT ASSUMES INTERBREEDING... BUT *V. v. patwin* ONLY INTERBREEDS WITH *Vulpes vulpes* IN A NARROW RANGE, & *V. v. necator* DOES NOT INTERBREED WITH *Vulpes vulpes* AT ALL. [source: "A Restricted Hybrid Zone Between Native and Introduced Red Fox (*Vulpes vulpes*) Populations Suggests Reproductive Barriers and Competitive Exclusion". Sacks, Moore, Statham, Wittmer, Heiko U. *Molecular Ecology*. Wiley. 20 (2): 326–341. (January 2011)]

What to do about that?

1. Reevaluate all 3 red fox species' populations, & apply WDM cull risks separately: Truer CEQA ratings for the natives will likely be: “Cumulatively Considerable...” (CC) and... Truer NEPA ratings for the natives of “Significant” (S)... for both *V. v. necator*, & *V. v. patwin*. It is impossible to believe the loss of even a handful of members, of such a low est. population, would not result in an irreversible loss of genetic diversity in the 2 native species.

2. Consider using WDM for good: First, require non-lethal tranquilizer-darting or live, non-injury trapping of all species of Red Foxes. Second, after genetic testing (much more accurate evaluation than split-second field decisions made thru a gunsight at 200 yards with a real bullet in the chamber...), release the native *V. v. necator* & *V. v. patwin* where they were darted, but euthanize *Vulpes vulpes* (or, for a more humanitarian outcome, thru a professional wildlife sponsor, release captives back to its native range (there are 6 other Red fox subspecies across North America).)

On the other hand, there is a place for shooting: take all the non-native feral pigs & get rid of their destruction. Maybe nearby pork producers would be willing to dress & market the carcasses (which might be quite lean) to help pay the cost of their removal? If the taste is not to palate's liking, how about pet/ zoo food?

ENVIRONMENTAL SETTING

153-2
Cont.

153-3

153-4

153-5

RE: DRC-1339 (Poison targeting non-native European starlings & gulls, with other birds less-so) is notable for “high toxicity in freshwater invertebrates & fish”. Since lead bullets are no longer allowed in CA due to each bullet’s lead’s non-target toxic legacy, DRC-1339 is not appropriate & should be eliminated... “Legally enforceable” or not, because what REALLY happens is multiple applicators with low information/ little oversight, intentionally & unintentionally apply off-label (aerosols carry in wind, rain/ irrigation runoff/ drains moves into blue line streams where it may damage non-target species (steelhead trying to recover?) or may persist/ accumulate in lakes)

RE: Carbon monoxide cartridges (trying to claim carbon-capture climate benefits? Plant a tree to fix carbon- not a cartridge!)

-John Ulloth

↑
I53-5
Cont.
I53-6

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Response to Comment Letter I53

John Ullcott
March 11, 2024

- I53-1** Grazing of public lands and the introduction of wildlife species is outside the scope of this EIR/EIS. Please also refer to Section 1.2.8, Public Lands.
- I53-2** Chapter 4 of the EIR/EIS and the discussion in Appendix D of the BTR evaluate potential impacts and explain why the Proposed Project/Proposed Action would not have significant impacts to biodiversity and ecosystems. No WDM action is conducted to eradicate a native wildlife population. The CDFA, WS-California, and county wildlife specialists operate in accordance with federal and state laws and regulations enacted to ensure species viability. Any reduction of a local population or group would be temporary because immigration from adjacent areas or reproduction would soon replace the animals removed. Please also refer to Section 1.2.14, Biodiversity, of this document.
- The CDFA, WS-California, and wildlife specialists may use several types of traps under the Proposed Project/Proposed Action and Alternatives 1 through 3, as described in Appendix C of the EIR/EIS. Please refer to Section 1.2.9, Non-Lethal WDM, and Section 1.2.10, Humaneness.
- Regarding the use of tax dollars, please refer to Section 1.2.7, Economics.
- I53-3** The gray wolf is currently protected in California under the California Endangered Species Act. The EIR/EIS does not include the use of lethal WDM for gray wolf damage management. The commenter asserts that WS-California's USFWS gray wolf consultation is outdated or insufficient. WS-California's most recent formal consultation with the USFWS regarding gray wolf populations was completed on July 21, 2020 (Appendix A of the BTR, which is Appendix D of the EIR/EIS). This consultation evaluated the potential impacts of lethal and nonlethal WDM methods on adult and juvenile gray wolves and minimizing measures were established. Changes in gray wolf range and population in California were addressed. Conditions or WDM actions have not changed substantially since then to warrant a new consultation. Please also refer to Section 1.2.15, Wolves, of this document for further information.
- I53-4** Commenter claims that the red fox analysis combines the population estimates of the non-native red fox (*Vulpes vulpes*), the native Sierra Nevada red fox (*Vulpes vulpes necator*), and the native Sacramento Valley red fox (*Vulpes vulpes patwin*). The commenter claims that because of this, the analysis underestimates the potential impact of WDM on Sacramento Valley red fox by overestimating the sub-species' population. As stated in Section 3.2.5 of the EIR/EIS and Appendix C6 of the BTR (Appendix D to the EIR/EIS), Sacramento Valley red fox suitable habitat was estimated using the red fox CDFW habitat model, which does not distinguish between the red fox range and its sub-species' range. However, the final estimate only includes suitable habitat from the range of the Sacramento Valley red fox (i.e., Shasta, Tehama, Glenn, Butte, Colusa, Sutter, Solano, and Yolo Counties) (see Tables 1 and 2 and Figure 3 of Appendix C6 of the BTR). Furthermore, as stated in Appendix C6 of the BTR, the Sacramento Valley red fox population estimate calculation does not use non-native red fox home range and density estimates. The population estimate calculation only references Sacramento Valley red fox or other native sub-species home range and density estimates (see Tables 3 and 4 of Appendix C6 of the BTR).

Commenter provided Sacks et al. (2011) to claim that interbreeding between non-native red fox and native Sacramento Valley red fox occurs in a limited range and that no interbreeding between the non-native red fox and native Sierra Nevada red fox occurs. As explained in Section 3.2.5.3 of the EIR/EIS, the USFWS (2021) notes that interbreeding between the non-native red fox and native Sierra Nevada red fox has been documented and is of concern for sub-species conservation. The CDFA and WS-California agree that interbreeding between non-native red fox and native Sacramento Valley red fox occurs in a limited range. As stated in Section 3.2.5.3, relatively local hybridization between the native Sacramento Valley red fox and the non-native red fox has been observed within a relatively small portion of the native population and is considered the most immediate threat to that native Sacramento Valley red fox population (Sacks et al. 2010a, 2010b).

The commenter states that the analysis is flawed because it assumes interbreeding between non-native red fox and native Sacramento Valley red fox and between non-native red fox and native Sierra Nevada red fox. As stated above, the Sacramento Valley red fox population estimate does not include non-native red fox home range or density estimates. However, annual average lethal take used in the analysis (i.e., annual average lethal take during the analysis period [calendar years 2010–2019]) could potentially include some non-native red fox. Because the Sacramento Valley red fox subspecies cannot be reliably distinguished from non-native red fox or native-non-native hybrids without genetic analysis, it is unknown how much, if any, of this take was Sacramento Valley red fox. Because it is not possible to be certain, all take in these counties is included, only portions of which potentially contain Sacramento Valley red fox. Thus, the Sacramento Valley red fox analysis potentially overestimates annual average lethal take. If Sacramento Valley red fox annual average lethal take is overestimated in the EIR/EIS, it can only lead to a more conservative impacts analysis.

Language has been added in Section 4.2.2.3 of the EIR/EIS, Section 3.2.5 of the BTR, and Appendix C6 of the BTR to more clearly distinguish between non-native red fox and the native Sacramento Valley red fox. However, these additions do not alter the analysis or conclusions in the EIR/EIS.

I53-5, I53-6 Please refer to Section 1.2.1, Outside the Scope, and Section 1.2.13, Chemical WDM.

Public Submission

Comment from Anonymous

Posted by the **Animal and Plant Health Inspection Service** on Jan 8, 2024

Comment

I recommend we stop blaming wildlife for damages. It is absurd as evidence reveals people have been the cause of extinctions since we became bipedal. Regarding wildfire the fossil fuel industry and it's shareholders should have their profits seized to pay for damages and to relocate developments built in fire and flood zones.

I54-1

Retreat and give wildlife their historical habitat back and we will all be the better for it, except maybe developers and realtors.

I54-2

Comment ID

APHIS-2020-0081-0021

Tracking Number

lr5-js9t-bt10

- [Comment Details](#)
- [Submitter Info](#)

- Document Subtype

Public Comment

- Received Date

Jan 7, 2024

Response to Comment Letter I54

Anonymous
January 8, 2024

I54-1, I54-2 The CDFA, WS-California, and county wildlife specialists do not have the authority to manage wildlife habitat, and this is outside the scope of this EIR/EIS.

Public Submission

Comment from Anonymous

Posted by the **Animal and Plant Health Inspection Service** on Jan 17, 2024

Comment

From what I see, wildlife is the big loser in all scenarios. I think wildlife creatures shouldn't be regarded as pests. The environment is wrecked by humans and the animals they domesticate for their own use.

Comment ID

APHIS-2020-0081-0022

Tracking Number

lrh-ca6a-ptw4

- [Comment Details](#)
- [Submitter Info](#)

- Document Subtype

Public Comment

- Received Date

Jan 16, 2024

I
155-1

Response to Comment Letter I55

Anonymous
January 16, 2024

- I55-1** The CDFA and WS-California thank the commenter for this comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.

Info CaliforniaWDM

From: [REDACTED]
Sent: [REDACTED]
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,

[REDACTED]

F1-1

Response to Comment Letter F1

See Attachment A for List of Form Letter Submitters (Total of 3,394)

**See Attachment B for Example Form Letter and Unique Form Letters
March 1 through March 18, 2024**

F1-1 Please refer to Section 1.2.7, Economics; Section 1.2.9, Non-Lethal WDM; Section 1.2.10, Humaneness; Section 1.2.11, Alternatives; Section 1.2.14, Biodiversity; and Section 1.2.15, Wolves.

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

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9 Transcript of Audio File:
10 CALIFORNIA WILDLIFE DAMAGE MANAGEMENT
11 PUBLIC COMMENT MEETING
12 FEBRUARY 8, 2024
13
14 Audio Runtime: 3 Hours 1 Minute 12 Seconds
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CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

Page 2

1 (Beginning of Audio Recording.)

2 MS. OGBURN: Welcome to the California

3 Wildlife Damage Management public comment meeting. A

4 few -- a few housekeeping items. All lines were muted

5 upon entry, and individual video feeds will not be

6 permitted. Your individual internet connection

7 bandwidth usage may impact your viewing experience

8 during the online public comment meeting. It's best to

9 close all other applications, for example, Outlook, and

10 limit streaming or downloading during the online public

11 meeting.

12 By joining this meeting, participants agree

13 not to use inappropriate or threatening language. This

14 meeting is being recorded, and all verbal comments will

15 be documented by a court reporter for administrative

16 purposes.

17 Project team, we have Jeff Flores, the state

18 director for Wildlife Services California. We have Dr.

19 Annette Jones, the state veterinarian for California

20 Department of Food and Agriculture. Myself, Michelle

21 Ogburn. I'm the project manager with Dudek, and we

22 have Lucas Grunbaum, the project counsel with Paul

23 Hastings.

24 Introduction to the project. Wildlife

25 provides many benefits but may damage agricultural

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

Page 3

1 resources, natural resources, and threaten human and
2 companion animal health and safety. Wildlife Damage
3 Management seeks to resolve these conflicts between
4 humans and wildlife. The California Department of Food
5 and Agriculture, CDFA, and Wildlife Services
6 California, WS California, prepared a joint
7 environmental impact report and environmental impact
8 statement that provides a comprehensive environmental
9 analysis of current and proposed future WDM activities
10 undertaken across California.

11 Today's topics. Project objectives, a
12 proposed project and proposed action overview, an
13 overview of alternatives to the proposed project and
14 proposed action, topics analyzed and overview of
15 process and, of course, comments.

16 The CDFA and Wildlife Services California
17 entered into a memorandum of understanding, also known
18 as an MOU, to facilitate this project. The MOU
19 provides a framework for coordination and cooperation
20 on statewide integrated wildlife damage management
21 activities. This review process includes CDFA's
22 compliance with the California Environmental Quality
23 Act, CEQA, and Wildlife -- Wildlife Services
24 California's compliance with the National Environmental
25 Policy Act, NEPA. This slide identifies key objectives

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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1 for CDFA.

2 The CDFA serves as the CEQA lead agency, and

3 Wildlife Services California serves as the NEPA lead

4 agency for this joint CEQA Environmental Impact Report,

5 EIR, and NEPA Environmental Impact Statement, EIS.

6 Statewide analyses like these ones conducted in the

7 EIR/EIS allow for implementation over a long timeframe

8 and/or implementation across a large geographic area.

9 This slide identifies key objectives of Wildlife

10 Services California.

11 The CDFA is mandated to protect California's

12 agricultural industry. As part of this mandate, CDFA

13 must prevent the introduction and spread of any animals

14 that are dangerous or detrimental to the agricultural

15 industry of the state. The CDFA may also undertake

16 rapid response to activities to respond to an emergency

17 or high-risk wildlife promptly -- abate and prevent

18 harm to the agricultural industry, human health and

19 safety, or natural resources.

20 The CDFA primarily serves in an oversight

21 and support capacity by providing data and

22 recommendations. California has a unique system of

23 county agricultural commissioners, and the legislature

24 has specified that, where the CDFA and county

25 agricultural commissioners have joint responsibilities,

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

Page 5

1 wildlife damage management is performed at the county
2 level by the county agricultural commissioners.
3 Wildlife Services has many roles when it
4 comes to wildlife damage management. They provide
5 information on sources of wildlife damage management,
6 conduct depredation investigations, deliver training on
7 the use of damage management methods. Wildlife
8 Services also receives requests per assistance from the
9 public, private entities, and other agencies and
10 governmental bodies and Native American tribes.
11 Wildlife Services also plays a key role in the
12 protection of humans and wildlife.
13 In addition to the proposed project,
14 proposed action, a range of alternatives were developed
15 after two public virtual scoping sessions were held due
16 to the pandemic. The alternatives included maintaining
17 the status quo, a reduction in operational assistance
18 by reducing and removing lethal operational assistance.
19 Based on comments received during the public scoping
20 process, we also analyzed a financial reimbursement
21 alternative. I would like to point out that this
22 alternative will most likely be only available to
23 counties and potentially CDFA, and is not available to
24 Wildlife Services California as they do not have any
25 means to authorize or fund this alternative, so it was

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

Page 6

1 not analyzed under NEPA. The last alternative that was
2 analyzed was a true no-project alternative by including
3 the cessation of Wildlife Services California WDM
4 activities.

5 The project team carefully considered the
6 resource topics that would -- could be impacted by the
7 project, and after analysis, these were the topics that
8 were selected for in-depth analysis by the team. We
9 have agricultural and forestry resources, biological
10 resources, tribal cultural resources, hazards and
11 hazardous materials, human and companion animal health
12 and safety, noise, and public services.

13 Here is an outline showing the CEQA and NEPA
14 processes. This project is currently in the public
15 review and agency review phase of 60 days. The next
16 step after the review period will be to provide a
17 response to comments received. Substantive comments
18 will be addressed in the final EIR/EIS. The final
19 EIR/EIS will get a 30-day review period, and then the
20 record of decision will be signed.

21 Which leads us to why we're here. The
22 comment period is open until March 12th of 2024. These
23 are the ways to submit comments. You may comment
24 verbally during this meeting. You may go to the
25 Federal eRulemaking Portal by going to

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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1 www.regulations.gov/docket/aphis-2020-0081. You may
2 also e-mail comments to info@californiawdm.org, or you
3 may mail written comments to California WDM at 2121
4 Broadway, P.O. Box 188797, Sacramento, California
5 95818.

6 Reminder, facilitators will call upon you
7 commenters who indicate they would like to make an oral
8 comment. For calling users, press star-9 to raise your
9 hand and star-6 to mute and unmute your line. If you
10 need assistance, please use the Q and A function to
11 send a note to myself or the co-host, and we will do
12 our best to assist you.

13 Participants using inappropriate or
14 threatening language will be muted, given instructions
15 to refrain from doing so, and provided another
16 opportunity to participate in the meeting. Upon a
17 second violation, the meeting facilitator will remove
18 the participant from the meeting. Each comment shall
19 state their name and will have three minutes to
20 comment. And for those of you joining by Zoom, you may
21 raise your hand using the raise hand function down at
22 the bottom of your screen. And again, if you're using
23 your phone, you can press star-9.

24 And here is our timer. You all have three
25 minutes. Would anyone like to go first? We will post

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CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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1 the presentation on the website, the project website.
2 MS. CHIU: All right. Looks like we have
3 Margot Lowe.
4 You can now unmute yourself, and you have
5 three minutes to speak.
6 MS. LOWE: I was just wondering. I'm
7 sitting here and I haven't heard anybody speak yet. Is
8 -- are people making comments?
9 MS. CHIU: No one has made any comments yet.
10 MS. LOWE: No. Okay. The only thing I
11 would have to say is the more that you can do for
12 animals, the better it is. You know, people should
13 take responsibility for raising their calves and
14 whatever else they're -- they're raising, and we should
15 preserve the -- the animals.
16 MS. OGBURN: Good afternoon, everyone.
17 Would just like to remind you that you have an
18 opportunity to make a verbal comment if you would like.
19 Please raise your hand, and we will unmute you, and you
20 will have three minutes to make your comment. Thanks.
21 Good afternoon, everyone. We'd like to
22 remind you that if you'd like to make a comment, please
23 raise your hand, and we will unmute you and allow you
24 to make a comment. You have three minutes to do so.
25 Thank you.

PC1-1

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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1 Good evening, everyone. I'd like to remind
2 everyone that they have an opportunity to verbally
3 comment on the California Wildlife Damage Management
4 EIR/EIS. If you'd like to comment, please raise your
5 hand, and we will give you the opportunity to unmute
6 yourself and three minutes to provide your comment.
7 Thank you.

8 Good evening, everyone. Just like to remind
9 you that if you'd like to make a comment, please raise
10 your hand, and we will unmute you so that you can do
11 so. And you will have three minutes to make your
12 verbal comment. Thank you.

13 MS. CHIU: I see Rebecca has her hand up.
14 You're now allowed to unmute yourself and
15 you have three minutes to talk.

16 MS. DMYTRYK: Thank you so much.

17 Good evening. My name is Rebecca Dmytryk
18 with Humane Wildlife Control Inc. I've been involved
19 in the field of vertebrate pest management for over 13
20 years and have become a leader in non-lethal strategies
21 for conflicts with all sorts of animals from mice to
22 mountain lions.

23 And over the years, what's become so clear
24 is that humans are the pests, if you will. Every
25 conflict that arises between humans and wildlife is the

PC1-2

PC1-3

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
Transcript of Audio File

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1 result of human behavior. And it's often kindled by an
2 anthropocentric perspective of, like, man versus
3 nature, or man separate of the earth.

4 What sets us apart from most other animals
5 is our ability to reason, to comprehend the
6 consequences of our actions, and that provides us
7 choice. Most other animals do not have this
8 capability. They act on pure, unadulterated instinct,
9 not with hate or malice or prejudice.

10 For example, when a predator kills a chicken
11 that's been allowed to wander, it's just doing what
12 nature or God intended, and yet the animal often pays
13 with its life. But who's really to blame for the loss
14 of the chicken? The human keeper. We humans cause the
15 upset. We humans set the stage for the animals to fail
16 for corrupting wildlife and then labeling them a menace
17 or a pest. And it's just wrong.

18 There needs to be much, much more emphasis
19 placed on the role humans play in human wildlife
20 conflicts. We must have a mechanism to hold people
21 accountable with adequate preventive measures
22 mandatory. Sure, mistakes will happen, but then who's
23 to blame?

24 I hope I've been clear that I oppose lethal
25 control measures except for extraordinary

PC1-3
Cont

PC1-4

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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Page 11

1 circumstances. Non-lethal and preventive strategies
2 must not only be prioritized but mandated. Thank you
3 so much for the opportunity to voice my opinion.
4 Goodnight.

5 MS. CHIU: Thank you, Rebecca.

6 MS. OGBURN: Good evening, everyone. I'd
7 like to remind you the opportunity to provide your
8 verbal comment. Please raise your hand, and we will
9 unmute you, and you can provide your verbal comment.
10 You will have three minutes. Thank you.

11 Good evening, everyone. I'd like to remind
12 you all that this is an open comment period, and you
13 can raise your hand, and then we give you three minutes
14 to comment on the Wildlife Damage Management draft
15 EIR/EIS. You will have a three-minute time frame to
16 provide your verbal comment after raising your hand.
17 Thank you.

18 Good evening, everyone. Would just like to
19 remind you that this is the public comment meeting for
20 the California Wildlife Damagement (sic) EIR/EIS. And
21 if you'd like to make a comment, please raise your
22 hand, and we will give you the opportunity to unmute
23 yourself and have three minutes for -- to provide your
24 comment. Again, please raise your hand if you'd like
25 to comment, and we will unmute you. Thank you. We

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PC1-4
Cont.

CA WILDLIFE DAMAGE MGMT PUBLIC COMMENT MEETING
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1 will have about 25 more minutes for public comment.
2 This meeting will end about 7:00 p.m. Thank you.
3 Good evening, everyone. We have about 10
4 minutes left of the public comment meeting. If you'd
5 like to make a comment, please raise your hand, and we
6 will give you three minutes to provide a verbal comment
7 on the Draft EIR/EIS for the California Wildlife Damage
8 Management EIR/EIS. Thank you. This will end at about
9 7:00. Thanks.
10 Okay. We'd like to thank everyone for
11 coming out this evening to provide comment on the
12 California Wildlife Damage Management draft EIR/EIS.
13 The public comment meeting is now closed. You may
14 still provide written comments via the e-planning --
15 the federal rulemaking portal at this website, the
16 www.regulations.gov/docket/APHIS-2020-0081, or by e-
17 mailing comments to info@CaliforniaWDM.org, or by
18 mailing them through the Postal Service to California
19 WDM, 2121 Broadway, P.O. Box 188797, Sacramento,
20 California 95818. And -- yep.
21 So thanks everyone, again, for coming. And
22 just as a reminder, this webinar will be posted on the
23 project website once it is available. So thanks,
24 again, for coming. Have a great evening, everyone.
25 Thanks again. Bye.

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1 (MEETING CONCLUDED AT 7:01 P.M.)

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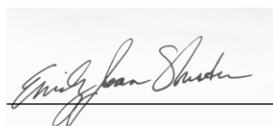
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CERTIFICATE

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I, Emily Shuster, do hereby certify that I
was authorized to and transcribed the foregoing
recorded proceedings, and that the transcript is
a true record, to the best of my ability.

Dated this 4th day of March 2024.



Emily Shuster

Response to Comment Letter PC1

**Public Comment Meeting
February 8, 2024**

PC1-1, PC1-2, PC1-3 Thank you for your comment. The comment does not raise any specific issues related to the adequacy of the EIR/EIS analysis; therefore, no further response is required.

PC1-4 Please refer to Section 1.2.9, Non-Lethal WDM.

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1.4 Responses to Literature/Citations Provided by Commenters

WS-California and the CDFA received documents attached to various public comments. WS-California and the CDFA considered these documents upon receipt from the commenters during the preparation of this Final EIR/EIS. These fall into three categories: (1) documents incorporated and cited in the EIR/EIS (Section 1.4.1), (2) documents considered but not cited in the EIR/EIS (Section 1.4.2), and (3) documents outside the scope of the EIR/EIS (Section 1.4.3).

1.4.1 Documents Incorporated and Cited in the EIR/EIS

WS-California and the CDFA received documents attached to various comments that were reviewed upon receipt and then incorporated into the EIR/EIS and cited herein. These are included in Table 2.

Table 2. Documents Incorporated into the EIR/EIS Upon Receipt and Review

Title of Source	Section Where Added/Addressed
Carroll, T., E. Hellwig, and M. Isadore. 2020. "An Approach for Long-Term Monitoring of Recovering Populations of Nearctic River Otters (<i>Lontra canadensis</i>) in the San Francisco Bay Area, California." <i>Northwestern Naturalist</i> 101(2): 77–91.	This document supports the conservative otter population estimate in Marin County and has been incorporated into the analysis in Section 3.2.9 of Appendix D (Biological Technical Report).

WS-California and the CDFA received documents attached to various comments that were already incorporated into the EIR/EIS. These are included in Table 3.

Table 3. Documents Already Incorporated into the EIR/EIS

Title of Source	Section Where Added/Addressed
Mezquida, E.T., S.J. Slater, and C.W. Benkman. 2006. "Sage-Grouse and Indirect Interactions: Potential Implications of Coyote Control on Sage-Grouse Populations." <i>Condor</i> 108: 747.	The document is referenced in Appendix D (Biological Technical Report) of the EIR/EIS.
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1.4.2 Documents Considered but Not Cited in the EIR/EIS

WS-California and the CDFA received documents attached to public comments that were either considered during the preparation of the EIR/EIS or reviewed upon receipt. The documents in Table 4 were not cited because they do not add substantively to the information and analyses in the EIR/EIS.

Table 4. Documents Considered but not Cited in the EIR/EIS

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Table 4. Documents Considered but not Cited in the EIR/EIS

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1.4.3 Documents Outside the Scope of the EIR/EIS

WS-California and the CDFA received documents attached to public comments. The documents in Table 5 were reviewed upon receipt and considered outside the scope of the EIR/EIS.

Table 5. Documents Outside the Scope of the EIR/EIS

Title of Source
Documents
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Table 5. Documents Outside the Scope of the EIR/EIS

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Table 5. Documents Outside the Scope of the EIR/EIS

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2 Changes Made to the EIR/EIS

Some commenters have suggested grammatical corrections. The CDFA and WS-California are grateful to the commenters for their careful attention to detail. These suggestions will be incorporated into the final document as appropriate. In addition to minor formatting and clarifying edits, the following edits were made to the EIR/EIS; these edits did not alter the content or conclusions.

Changes are shown in ~~strikeout~~/underline format (additions are underlined, deletions stricken out) and their page numbers in the Draft EIR/EIS are indicated. Footnotes within text brought over from the EIR/EIS have not retained their original numbering and are numbered consecutively within this document. The changes made to the draft are minor corrections and clarifications. None of the changes are substantial in nature. Additionally, no impact determinations have been changed and no mitigation measures have been added or substantially revised.

2.1 Edits to the Executive Summary

Pages ES-1 Through ES-2

WS-California has identified the following objectives:

- Respond in a timely and appropriate way to all WDM requests for technical and/or operational assistance, whether from private or public sources.
- Implement an integrated WDM approach which incorporates biological, legal, economic, environmental, cumulative, and sociocultural factors.
- Comply with all applicable federal, state, and local laws; Wildlife Services policies and directives; cooperative agreements; MOUs; and other legal requirements, ~~as feasible~~.
- Develop and improve lethal and non-lethal strategies to promote the most effective, target-specific, and humane remedies available given legal, environmental, and other constraints.
- Coordinate with the management goals and objectives of applicable WDM plans or guidance as determined by the jurisdictional state, tribal, or federal wildlife or land management agency.

Proposed Project/Proposed Action and Alternatives

WS-California currently uses an integrated approach to WDM involving access to the full range of legally available non-lethal and lethal WDM methods to optimize WDM. For this EIR/EIS five alternatives were developed. The alternatives are explained in more detail in Chapter 3. The Council on Environmental Quality (CEQ) defined the environmentally preferable alternative as the alternative that will promote the national environmental policy as expressed in the National Environmental Policy Act (NEPA), Section 101, which is the alternative that causes the least damage to the biological and physical environment, while still meeting the need for action. CEQ also considered that the environmentally preferred alternative would best protect, preserve, and enhance historic, cultural, and natural resources. The Proposed Project/Proposed Action is the environmentally preferable alternative because it allows WS-California to provide the greatest amount of assistance in resolving human-wildlife conflicts while also supporting the welfare of and harmony between wildlife and humans in accordance with NEPA Section 101. CEQA Guidelines Section 15126.6 define the environmentally superior alternative as meeting most of the needs of the basic project objectives, similar to satisfying the purpose and need, and resulting in the fewest

or least severe combination of significant environmental impacts. The environmentally superior alternative is the Proposed Project/Proposed Action.

Pages ES-6

Alternative 1 would have no impacts for direct and indirect methods, vibrational potential, and airport noise exposure under CEQA and not significant impacts under NEPA. Alternatives 1-32 and 3 would have less than significant impacts with mitigation for indirect and direct methods and less than significant impacts for vibration potential under CEQA and not significant impacts under NEPA. Alternative 4 would have less than significant impacts for indirect and direct methods, vibration potential, and no impacts for airport noise under CEQA. The Alternative 4 analysis is provided for informational purposes as financial reimbursement is not available to WS-California. Alternative 5 would have less than significant impacts for direct and indirect methods, vibration potential, and airport noise exposure under CEQA and not significant impacts under NEPA.

2.2 Edits to Chapter 1, Project Purpose, Need for Action, and Objectives

2.2.1 Section 1.5.2.4, Wildlife Damage Management to Protect Crops and Other Agricultural Resources

Page 1-15

Table 1-2. Estimated Monetary Loss from Predation Verified by WS-California to Livestock, Poultry, and Aquaculture Resources from 2010 to 2019

	Cattle	Equine ^a	Goat	Sheep	Swine	Llama/ Alpaca	Rabbit	Fowl ^b	Aquaculture ^c	Total
Mammals										
American_Bbadger	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$150.00	\$0	\$150.00
...										
Pacific martenPine martin	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$35.74	\$0	\$35.74
...										
Western_Sspotted skunk	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$120.00	\$0	\$120.00
...										
Birds										
...										
Great_horned owl	\$0	\$0	\$0	\$0	\$0 \$0	\$0	\$210.00	\$0	\$210.00	
...										

Page 1-17

Table 1-3. Estimated Monetary Loss from Damage Verified by WS-California to Commercial Forestry, Field Crops, Fruit and Nuts, and Pasture Resources from 2010 to 2019

	Commercial Forestry and Nursery ^a	Field Crops ^b	Fruit and Nuts ^c	Range/Pasture	Total
Mammals					
American_Bbadger	\$0	\$35,551.03	\$2,050.00	\$6,872.75	\$44,473.78
North American_Bbeaver	\$992,281.82	\$171,507.84	\$3,557,740.55	\$56,850.50	\$4,778,380.71
...					
Desert_eCottontails (Sylvilagus spp.)rabbit	\$0.00	\$2,925.00	\$0	\$200.00	\$3,125.00
...					
North American_Pporcupine	\$4,000.00	\$0	\$0	\$0	\$4,000.00
...					
Eastern_Ffox squirrel	\$0	\$0	\$365.00	\$0	\$365.00
...					

Table 1-3. Estimated Monetary Loss from Damage Verified by WS-California to Commercial Forestry, Field Crops, Fruit and Nuts, and Pasture Resources from 2010 to 2019

	Commercial Forestry and Nursery ^a	Field Crops ^b	Fruit and Nuts ^c	Range/Pasture	Total
Birds					
...					
California S scrub jay	\$0	\$0	\$100.00	\$0	\$100.00
...					

2.2.2 Section 1.5.2.5, Wildlife Damage Management for the Protection of Property

Pages 1-20 Through 1-21

Table 1-4. Estimated Monetary Loss from Damage Verified by WS-California to Property from 2010 to 2019

	Animals ^a	Turf/Landscaping ^b	Residential Building	Non-residential Building	Other Property	Equipment	Structures ^c	Total
Mammals								
American B badger	\$440.00	\$3,275.00	\$0.00	\$0.00	\$2,400.00	\$1,400.00	\$6,200.00	\$13,715.00
...								
North American B beaver	\$0	\$163,430.00	\$7,000.00	\$6,500.00	\$53,375.00	\$0	\$7,495,569.00	\$7,725,874.00
...								
Pacific marten Pine martin	\$0	\$0	\$0	\$125,000.00	\$0	\$0	\$0	\$125,000.00
...								
North American P porcupine	\$5,900.00	\$0	\$500.00	\$0	\$0	\$0	\$0	\$6,400.00
Desert e Cottontails (<i>Sylvilagus spp.</i>)	\$0	\$31,580.00	\$0	\$100.00	\$150.00	\$0	\$3,500.00	\$35,330.00
...								
Western S spotted skunk	\$0	\$0	\$17,950.00	\$100.00	\$0	\$0	\$0	\$18,050.00
...								
Eastern F fox squirrel	\$0	\$4,550.00	\$11,630.00	\$0	\$8,624.00	\$500.00	\$65.00	\$25,369.00
...								
Birds								
...								
Great_horned owl	\$0	\$0	\$0	\$0	\$0	\$1,000,000.00	\$0	\$1,000,000.00
...								

2.2.3 Section 1.6.1, Period for which this EIR/EIS is Valid

Page 1-24

This EIR/EIS would remain valid until the CDFA or WS-California, as lead agencies, determines that new or additional needs for action, changed conditions, new issues, and/or new alternatives having different environmental impacts needs to be analyzed to keep the information and analyses current. At that time, this analysis and document would be reviewed and, if appropriate, supplemented if the changes would have “environmental relevance” (40 CFR 1502.9[c]), or a new EIR/EIS prepared pursuant to CEQA and NEPA. The CDFA and WS-California will monitor WDM activities conducted by their personnel and ensure that those activities and their impacts remain consistent with the activities and impacts analyzed in the EIR/EIS and selected as part of the decision. Counties will monitor WDM activities conducted by their personnel and ensure those activities and their impacts remain consistent with the activities and impacts analyzed in the EIR/EIS and selected as part of the County program. Monitoring will include review of adopted mitigation measures, target and non-target take reported, and associated impacts analyzed in the EIR/EIS. Monitoring will ensure that WDM activity effects are within the limits evaluated in the selected alternative. The CDFA WDM Program will track statewide WDM activities by combining county level annual monitoring reports into a statewide cumulative annual review with assistance from WS-California.

2.2.4 Section 1.8, Tribal Involvement

Page 1-30

Tribal involvement in the scoping process and analysis of Tribal Cultural Resources (concerns of American tribes) is further described in Section 4.2.3, Tribal Cultural Resources, and Appendix E, Tribal Outreach, of this EIR/EIS.

2.2.5 Section 1.9, Organization of EIR/EIS

Page 1-31

Chapter 3, Alternatives: This chapter provides an in-depth discussion of alternatives to the Proposed Project/Proposed Action ~~and identifies the CEQA environmentally superior alternative, the NEPA environmentally preferable alternative, and the agency preferred alternative.~~

Appendices: The appendices include a comprehensive description of the proposed Program methods and applicable directives/policies and best practices, as well as applicable technical reports. Revisions made to the EIR/EIS as well as responses to public comments received during the Draft EIR/EIS public review period are included within Appendix G, Response to Comments.

2.3 Edits to Chapter 2, Project Description

2.3.1 Section 2.2.2, CDFA WDM Program Description

Page 2-5

A description of WDM activities and methods proposed in the Program and carried out by the CDFA is included in Appendix C of this EIR/EIS. The Counties would typically have a role in both CDFA-Led Activities and CDFA/County Activities, whereas other state and local agencies would sometimes be involved in one or both, to a greater or lesser degree. There would also be situations in which a county could take WDM action on its own, independent of either the CDFA or WS-California. Additionally, and in concert with ongoing CDFA and WS-California WDM activities conducted by their personnel, annual monitoring is undertaken to ensure that those activities and their impacts remain consistent with the activities and impacts analyzed in the EIR/EIS and selected as part of the decision. Counties will monitor WDM activities conducted by their personnel and ensure those activities and their impacts remain consistent with the activities and impacts analyzed in the EIR/EIS and selected as part of the County program. Monitoring will include review of adopted mitigation measures, target and non-target take reported, and associated impacts analyzed in the EIR/EIS. Monitoring will ensure that WDM activity effects are within the limits evaluated in the selected alternative. The CDFA WDM Program will track statewide WDM activities by combining county level annual monitoring reports into a statewide cumulative annual review with assistance from WS-California.

Pages 2-6 Through 2-7

- **Education and Outreach.** The Program will promote broader understanding and awareness about wildlife identification, biology, life history, damage, and best management practices (VPCRAC 2023). CDFA will undertake additional CEQA review as needed to support future discrete WDM actions or activities outside of the analyses in this EIR/EIS undertaken by CDFA or the Counties, including materials and methods identified through the information sharing and adaptive management processes. Potential audiences for education and outreach may include but are not limited to local government, landowners, University of California Cooperative Extension, agricultural associations, state agencies (e.g., Department of Water Resources, State Parks, Division of Boating and Waterways), municipalities, non-governmental organizations, and interested public. Educational and outreach material for health and safety, agricultural, and regulatory information is available in English and Spanish to assist with training and outreach.

2.3.2 Section 2.3.2, Overview

Page 2-9

It is not anticipated that the three broad categories of WS-California's current WDM activities would change as a result of the preparation of this EIR/EIS. However, the environmental analysis of the Proposed Project/Proposed Action, the CDFA WDM Program, and WS-California WDM activities that occur within these categories and are described in this EIR/EIS will inform and guide the implementation of future WDM activities conducted in California. Additionally, and in concert with ongoing WS-California WDM activities conducted by their personnel, annual monitoring is undertaken to ensure that those activities and their

impacts remain consistent with the activities and impacts analyzed in the EIR/EIS and selected as part of the decision. Monitoring will include review of adopted mitigation measures, target and non-target take reported, and associated impacts analyzed in the EIR/EIS. Monitoring will ensure that WDM activity effects are within the limits evaluated in the selected alternative. The CDFA WDM Program will track statewide WDM activities by combining county level annual monitoring reports into a statewide cumulative annual review with assistance from WS-California.

...

- **Cooperative Resource Protection.** WS-California is authorized to enter into CSAs with individual counties and land and resource owners/managers to implement activities that resolve or minimize wildlife damage impacting agriculture and property (including infrastructure). WS-California provides WDM services under these agreements, including technical assistance (including education and advice) and implementation of WDM methods (including the deployment of wildlife specialists and specialized equipment, as described in Appendix C). Educational, training, and outreach materials and signage are available in English and Spanish. Translation services are also available if necessary to communicate with cooperators.

2.4 Edits to Chapter 3, Alternatives

2.4.1 Section 3.1, Introduction

Page 3-1

This chapter of the environmental impact report (EIR)/environmental impact statement (EIS) describes the methodology used to identify and screen alternatives to the Proposed Project, and compares the environmental impacts of the alternatives; ~~and identifies the California Environmental Quality Act (CEQA) environmentally superior alternative, the National Environmental Policy Act (NEPA) environmentally preferable alternative, and agency preferred alternative.~~

2.4.2 Section 3.5.1, Issue A: Impacts/Effects on Biological Resources

The analysis in Chapter 4 found that the Proposed Project/Proposed Action and Alternative 1, with the inclusion of protective measures to minimize risk, would result in the greatest ~~take~~lethal removal of predators by the CDFA and WS-California, but they would not adversely affect any target species populations. Alternative 2 would result in less take of target species, as it is limited to lethal operational WDM for human and pet health and safety, threatened and endangered (T&E) species protection, and airport wildlife hazard management. Alternatives 3, 4, and 5 would not have a significant adverse effect on target species as no lethal operational WDM would occur; refer to Section 4.2.2, Biological Resources, for more detailed analysis. Under the alternatives where the CDFA and WS-California are unable to provide assistance, it is possible that another entity capable of providing assistance with WDM may conduct the action in place of the CDFA and/or WS-California. Examples of benefits of CDFA and WS-California involvement include standardized training and procedures, documented compliance with environmental laws, and public involvement.

Non-Target Species

Impacts/effects on non-target species are divided into two categories—Endangered Species Act (ESA)/T&E species and other unintentional take. Refer to Section 4.2.2 for more detailed analysis of potential impacts to non-target species. Laws, policies, and legislation regulating the protection of T&E and other special status species are provided in Appendix B.

2.4.3 Section 3.10, Alternatives Impact Analysis

Page 3-23

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
Agricultural and Forestry Resources												
AG-1: Convert Prime Farmland, Unique Farmland, or Statewide Importance Farmland to non-agricultural use?	NI	NI	= NI	= NI	▲ LTS	≡ ▲ NI	▲ LTS	▲ NS	▲ LTS	NA	▲ <u>SU</u> LTS	▲ <u>S</u> NS
AG-4: Loss of forest or conversion of forest to non-forest use?	NI	NI	= NI	= NI	▲ LTS	▲ NS	▲ LTS	▲ NS	▲ LTS	NA	▲ LTS	▲ NS
AG-5: Involve other changes in the existing environment, which could result in conversion of Farmland to non-agricultural use?	NI	NI	= NI	= NI	▲ LTS	≡ ▲ NI	▲ LTS	≡ ▲ NI	▲ LTS	NA	▲ LTS	▲ NS
AG-6: Result in the loss of market value of agricultural products sold in California, agricultural employment, and agricultural income/earnings?	B	NI	▲ ≠ NI	= NI	▲ LTS	▲ NS	▲ LTS	▲ NS	▲ LTS	NA	▲ SU	▲ S
Biological Resources												
BIO-1: Substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species?	LTS SU*	NS	= NI = SU*	= NS	▲ LTS + mitigati on = SU*	≡ ▲ NS	▲ LTS + mitigati on	≡ ▲ NS	≡ ▲ LTS	NA	▼ ▲ NI	▼ ▲ NI

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
* Mountain Lion if listed under California Endangered Species Act (16 Counties – See Section 4.2.2-10).												
BIO-2: Substantial adverse effect on any riparian habitat or other sensitive natural community?	LTS	NS	▼ ≠ NI	▼ ≠ NI	= LTS	= NS	= LTS	= NS	≡ ▲ LTS	NA	≡ ▲ LTS	≡ ▲ NS
BIO-3: Substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?	LTS + mitigation	NS	▼ ≠ NI	= NS	= LTS + mitigation	= NS	= LTS + mitigation	= NS	▼ ≠ NI	NA	▼ ≠ NI	▼ ≠ NI
BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTS + mitigation	NS	= LTS + mitigation	= NS	= LTS + mitigation	= NS	= LTS + mitigation	= NS	▼ ▲ LTS	NA	▼ ≠ LTS	▼ ≠ NI
BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS + mitigation	NI	▼ ≠ NI	= NI	= LTS + mitigation	= NI	= LTS + mitigation	= NI	▼ ≠ NI	NA	▼ ≠ NI	= NI
BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community	LTS + mitigation	NI	▼ ≠ NI	= NI	= LTS + mitigation	= NI	= LTS + mitigation	= NI	▼ ≠ NI	NA	▼ ≠ NI	= NI

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
Conservation Plan, or other approved conservation plan?												
BIO-7: Cause a substantial adverse effect to populations of non-special status wildlife or plant species, especially if those could result in substantial ecosystem changes? *Brush Rabbit and Red Fox	LTS + mitigati on	NS	▼ ≠ NI	= NS	▲ LTS + mitigati on ▼ ≠ LTS	= NS	▲ LTS + mitigati on ▼ LTS	≡ ▼ NS	▼ LTS	NA	▼ LTS	≡ ▼ NS
Tribal Cultural Resources												
TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource?	LTS + mitigati on	NS	▼ ≠ NI	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	NA	▼-▲ LTS	≡-▲ NS
TCR-2: Cause an adverse effect to a traditional cultural property, landscape, or other resource of Native American traditional religious or cultural importance?	LTS + mitigati on	NS	▼ ≠ NI	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	NA	▼-▲ LTS	≡-▲ NS
Hazardous Materials												
HAZ-1: Expose the public or the environment to significant hazards through the transport, use, or disposal of hazardous materials?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-2: Expose the public or the environment to significant hazards through reasonably foreseeable upset and	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
accident conditions involving the release of hazardous materials into the environment?												
HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school?	LTS + mitigation	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-4: Be located on a site that is included on a list of hazardous materials sites and, as a result, would create a significant hazard to the public or the environment?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-5: For projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or within the vicinity of a private airstrip, would it result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-6: Impair the implementation of or physically interfere with an adopted emergency response	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
plan or emergency evacuation plan?												
HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-8: Expose physiologically sensitive populations to human health hazards?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
HAZ-9: Impact human health of the environment in such a manner that it would disproportionately effect minority and/or low-income communities?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
Human and Pet Health and Safety												
HHPS-1: Directly, indirectly, or cumulatively result in adverse effects on human or companion animal health and safety?		NS		= NS		= NS		= NS		NA		= NS
Noise												
NOI-1: Result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of local general plan or noise ordinance, or applicable standards?	LTS + mitigati on	NS	▼ ≠ NI	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	= NS	▼ ≠ LTS	NA	▼ ≠ LTS	= NS

Table 3-1. Comparison of Impacts from the Proposed Project/Proposed Action and Alternatives

Environmental Topic	Proposed Project		Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA	CEQA	NEPA
NOI-2: Result in the generation of excessive groundbourne vibration or groundbourne noise levels?	LTS	NS	▼ ≠ NI	= NS	= LTS	= NS	= LTS	= NS	= LTS	NA	= LTS	= NS
NOI-3: For projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or within the vicinity of a private airstrip, would it expose people residing or working in the project area to excessive noise levels?	LTS + mitigati on	NS	▼ ≠ NI	= NS	= LTS + mitigati on	= NS	= LTS + mitigati on	= NS	▼ ≠ NI	NA	▼ ≠ LTS	= NS
Public Services												
PS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times, or other performance objectives?	B	NI	▲ ≠ NI	= NI	▲ ≠ NI	= NI	▲ LTS	▲ NS	▲ LTS	NA	▲ LTS	▲ NS

2.5 Edits to Chapter 4, Environmental Setting/ Affected Environment

2.5.1 Section 4.2.2, Biological Resources

Pages 4.2.2-5 Through 4.2.2-6

Table 4.2.2-3. Threatened and Endangered Bird, Reptile, and Mammal Species Intended as Beneficiaries of WS-California Activities (2010-2019)

Species Protected	Federal/State Status	Counties Involved
Salt marsh harvest mouse (<i>Reithrodontomys raviventris</i>)	Endangered/Endangered, FP	Solano, Marin, Contra Costa, Alameda, Santa Clara, San Mateo
Sierra Nevada bighorn sheep (<i>Ovis canadensis sierrae</i>)	Endangered/Endangered, FP	Inyo, Mono
California Ridgway's rail (<i>Rallus obsoletus obsoletus</i>)	Endangered/Endangered, FP	Solano, Contra Costa, Alameda, Santa Clara, San Mateo, Marin
Light-footed Ridgway's rail (<i>Rallus obsoletus levipes</i>)	Endangered/Endangered, FP	Ventura, San Diego
Western snowy plover (<i>Charadrius nivosus nivosus</i>)	Threatened/SSC	Marin, Alameda, Contra Costa, Santa Clara, San Mateo, Monterey, Santa Cruz, San Luis Obispo, Santa Barbara, Ventura, San Diego
California least tern (<i>Sternula antillarum browni</i>)	Endangered/Endangered, FP	Alameda, Contra Costa, San Luis Obispo, Ventura, San Diego
California condor (<i>Gymnogyps californianus</i>)	Endangered/Endangered, FP	Kern
Marbled murrelet (<i>Brachyramphus marmoratus</i>)	Threatened/Endangered	Santa Cruz
Desert tortoise (<i>Gopherus agassizii</i>)	Threatened/Threatened	Kern, San Bernardino, Riverside, Los Angeles

Notes: FP = Fully Protected; SSC = Species of Special Concern.

Other special-status species that could benefit from removal of target species by the Proposed Project/Proposed Action include a wide variety of species ranging from smaller species such as kangaroo rats (*Dipodomys* sp.), arroyo toads (*Anaxyrus californicus*), Mohave ground squirrel (*Xerospermophilus mohavensis*), and Tehachapi slender salamanders (*Batrachoseps stebbinsi*), to medium-sized carnivores such as San Joaquin kit fox (*Vulpes macrotis mutica*) and bird species such as burrowing owl (*Athene cunicularia*).

Pages 4.2.2-6 Through 4.2.2-7

Table 4.2.2-4. Special-Status Bird and Mammal Species Population Estimates

Species Name	Common Name	Special-Status ¹	California Population Estimate ²
<i>Agelaius tricolor</i>	Tricolored blackbird	State Threatened	210,042
<i>Antigone canadensis tabida</i>	Sandhill crane	State Threatened, Fully Protected	41,788
<i>Haliaeetus leucocephalus</i>	Bald eagle	State Endangered, Fully Protected	10,953
<i>Aquila chrysaetos</i>	Golden eagle	Fully Protected	3,801
<i>Buteo swainsoni</i>	Swainson's hawk	State Threatened	44,000
<i>Elanus leucurus</i>	White-tailed kite	Fully Protected	9,700
<i>Circus hudsonius</i>	Northern harrier	Species of Special Concern	24,000
<i>Charadrius nivosus nivosus</i>	Western snowy plover	Federally Threatened	1,738
<i>Sternula antillarum browni</i>	California least tern	Federally and State Endangered, Fully Protected	8,190
<i>Puma concolor</i>	Mountain lion	State Candidate	2,530
<i>Bassariscus astutus</i>	Ringtail	Fully Protected	389,236
<i>Taxidea taxus</i>	American badger	Species of Special Concern	74,683
<i>Xerospermophilus mohavensis</i>	<u>Mohave ground squirrel</u>	<u>State Threatened</u>	<u>468³</u>

Notes:

- ¹ Special-status species are defined in this document as those with federal or state listing status (i.e., threatened, endangered, federally proposed listed species, state and federal candidate species, fully protected species, and California species of special concern).
- ² Population estimates for special-status bird species, except for sandhill crane, Swainson's hawk, white-tailed kite, western snowy plover and California least tern, are based on USGS North American Breeding Bird Survey population estimates for the target special-status bird species within the State of California, which is based on the average of survey years 2015 through 2019. The population estimate for sandhill crane is from the Pacific Flyway Databook 2021 (Olson 2021). The population estimates for Swainson's hawk and white-tailed kite are from the Avian Conservation Assessment and Population Estimates Database (PIF 2022). The population estimate for western snowy plover is based on the 2019 totals reported for the recovery units occurring in California (USFWS 2019). The population estimate for California least tern is based on the number of breeding pairs (4,095) reported from 2017 (USFWS 2020). Population estimates for special-status mammal species are based on the species-specific population model estimates (Appendices C1–C29 to the BTR).
- ³ Population estimate for Mohave ground squirrel based on Leitner (2020).

Pages 4.2.2-21 Through 4.2.2-22

Sacramento Valley Red Fox

California is home to two native red fox subspecies, the Sierra Nevada red fox (*Vulpes vulpes necator*) and the Sacramento Valley red fox (*Vulpes vulpes patwin*), as well as the non-native red fox (*Vulpes vulpes*). The non-native red fox populations are not part of the natural fauna of California and are therefore not considered in this analysis. Lethal WDM of non-native red fox does not have the potential to negatively impact native wildlife species in California.

The Sierra Nevada red fox population consists of two Distinct Population Segments (DPS); the Sierra Nevada DPS is estimated to be approximately 18 to 39 individuals (USFWS 2021) and the Southern Cascades DPS is estimated

to be approximately 42 adults (USFWS 2015). While WDM activities have the potential to incidentally capture a non-target Sierra Nevada red fox of either DPS occurring within the subspecies' range (Felix, pers. comm. 2022; CDFG 2005), the subspecies is not targeted for WDM due to its protected status (State Threatened and/or Federal Endangered ~~in the Sierra Nevada District Population Segment~~ [86 FR 41743; CDFW 2022a]) and limitations placed on WDM methods by CDFW and USFWS within the range of this subspecies ~~in both DPS~~ of either DPS render incidental take extremely unlikely (e.g., 14 CCR 465.5, CDFG 2005; CDFW 2016; USFWS 2022). No Sierra Nevada red fox has even been taken by WS-California for WDM, and there appears to be little potential for future lethal take of Sierra Nevada red fox from WDM. However, to ensure that there is no potential for impact to this subspecies from WDM in California by CDFA or Counties, MM-BIO-7 would be implemented (refer to Section 4.2.2.3.2). Impacts under CEQA would be less than significant with mitigation. Impacts under NEPA would be not significant as these measures are already incorporated into WS-California's WDM.

The Sacramento Valley subspecies currently has no legal protection under state or federal law, and therefore WDM activities do not distinguish between the Sacramento Valley red fox and the non-native species (CDFW 2022a). The genetic effective population size of the Sacramento Valley red fox is estimated to be between 50 and 80 breeding individuals and evidence suggests that the population is declining (Sacks et al. 2010a; Sacks et al. 2010b). Based on the CDFW habitat modeling for red fox, the estimated population size for the counties where the Sacramento Valley red fox could occur (i.e., Shasta, Tehama, Glenn, Butte, Colusa, Sutter, Solano, and Yolo) is 228 individuals. However, this population estimate may include both Sacramento Valley red fox individuals and non-native red fox individuals since there is known geographical overlap between the non-native and native subspecies. To conservatively estimate the Sacramento Valley red fox populations, non-native red fox home range and density estimates are not used in the Sacramento Valley red fox population calculation (See Appendix C6 of the BTR).

The total Proposed Project/Proposed Action Maximum Lethal Take Estimate is 9 red foxes taken annually within the range of the Sacramento Valley red fox, which represents 4.0% of the Sacramento Valley red fox population (Appendix D). The Proposed Project/Proposed Action Maximum Lethal Take Estimate in proportion to county estimated population ranges from 0% (several counties) to 13.5% (5 of 37 individuals estimated in the Colusa County population). These numbers represent the highest take expected within the range of the Sacramento Valley red fox under the Proposed Project/Proposed Action in any year. The Proposed Project/Proposed Action would not be expected to reach this level of take in most years.

Red foxes are considered mesopredators (Prugh et al. 2009) and are known to coexist with other mesopredators such as gray foxes, kit foxes, and coyotes in lowland California (CWHR 2022). Mesopredators can fulfill an important role in ecosystem function, structure, and dynamics (e.g., trophic cascade) (Roemer et al. 2009). For example, high species diversity of apex predators, mesopredators, and prey species in an ecosystem can make mesopredator release less likely to occur (Brashares et al. 2010). Indirect impacts to ecosystem function, structure, or dynamics resulting from the Proposed Project/Proposed Action's lethal WDM to Sacramento Valley red foxes are not anticipated due to the percentage of Sacramento Valley red foxes impacted by the Proposed Project/Proposed Action regionally, statewide, and cumulatively is below the sustainable mortality threshold of 25%.

The annual level of lethal WDM within the range of the Sacramento Valley red fox by the Proposed Project/Proposed Action (4.0% of the statewide population and 0% to 13.5% of county populations) would not exceed the sustainable harvest rate of 25% (Section 3.2.5 of Appendix D). Furthermore, it was assumed that all WDM take occurred to the Sacramento Valley subspecies; however, it is likely that at least some or potentially all of the foxes killed would be non-native red fox. Subspecies-level identification, which requires genetic analysis, was not conducted. Because the percentage of the red fox population annually lethally taken within the range of the Sacramento Valley red fox by WDM activities within the counties in which it occurs is low, the Proposed Project/Proposed Action would not

substantially affect statewide or countywide populations, and no ecosystem-level effects are anticipated. This would result in a less than significant impact under CEQA and a not significant impact under NEPA on Sacramento Valley red fox populations.

CEQA Conclusion: *Less than significant with mitigation.*

NEPA Conclusion: *Not significant.*

Pages 4.2.2-23 Through 4.2.2-24

River Otter

The statewide population estimate for river otter is approximately 896 individuals. The total Proposed Project/Proposed Action Maximum Lethal Take Estimate is 15.2 river otter taken annually, which represents 1.7% of the population (Appendix D). The Proposed Project/Proposed Action Maximum Lethal Take Estimate in proportion to county estimated population ranges from 0% (several counties) to 13.0% (0.4 individuals of 3 estimated county population; Lake County). However, the low population estimate for river otter in Lake County is only 3 individuals, which is not consistent with local reports that include them occupying boat docks around the Clear Lake shoreline, with up to 11 otters described on a single dock.¹² Similarly, the low population estimate for river otter in Marin County based on the analysis presented in Appendix D using CDFW habitat suitability modeling is 0 individuals, whereas data suggests a recovering population of at least 73 individuals across 14 sites (Carroll et al. 2020). The next highest Proposed Project/Proposed Action Maximum Lethal Take Estimate by estimated county population is Yuba County with 9.2% (1.6 individuals of 17 estimated county population). These numbers represent the highest take expected under the Proposed Project/Proposed Action in any year. The Proposed Project/Proposed Action would not be expected to reach this level of take in most years.

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Sacramento Valley Red Fox

Cumulative anthropogenic mortality of red fox was assessed by adding all known and estimated anthropogenic mortality sources: Proposed Project/Proposed Action WDM take, hunter and trapper harvest (from CDFW reports), roadkill, and rodenticides and other human causes (Appendix D). When all values are rounded up to provide a conservative estimate, cumulative mortality was estimated to be 12.7% statewide and ranged from 7.7% to 21.6% by county. Lethal WDM under the Proposed Project/Proposed Action would be responsible for a maximum of 31% (9 of 29 individuals) of cumulative anthropogenic mortality statewide in a year of maximum take. The county with the highest cumulative mortality and highest percentage of cumulative mortality is Colusa County (8 individuals, 21.6% of the county population). Maximum lethal WDM under the Proposed Project/Proposed Action would contribute 63% of this cumulative mortality (5 of 8 individuals). Maximum cumulative mortality estimates for Sacramento Valley red fox statewide and in each county are all below the conservative 25% sustainable mortality threshold derived in Appendix D (Section 3.2.5).

CEQA Conclusion: *Less than cumulatively considerable.*

NEPA Conclusion: *Not significant.*

¹² <https://www.record-bee.com/2016/02/24/otters-a-common-sight-at-clear-lake/>

Pages 4.2.2-77 Through 4.2.2-78

Alternative 2: Non-Lethal Operational WDM, Except for Human/Companion Animal Health and Safety, Threatened and Endangered Species Protection, and WHM

Alternative 2 would be similar to the Proposed Project/Proposed Action; however, lethal WDM would only occur in cases to protect human (including airport WHM) and companion animal health and safety, and for T&E species protection. Lethal WDM of non-special-status species including non-native or feral species would continue to occur but would be conducted by other entities, who may or may not adhere to safety precautions, BMPs, or federal state, and/or local laws. Alternative 2 would likely increase WDM activities by other entities in proportion to the reduction of services previously provided by WS-California. Other entities, including private landowners, would not likely have the expertise, training, equipment (e.g., firearms, I&E drugs, aircraft), or authorization to carry out WDM like WS-California and it is likely that calls for service would go unaddressed. It is possible that this alternative would result in reduced levels of WDM of non-special-status species, but that is speculative as the future capacity of other entities to conduct lethal WDM is unknown. Take of unprotected mammals by private individuals or their agent is not required to be reported to CDFW or other agencies, resulting in underreporting as compared to the Proposed Project/Proposed Action. Impacts to non-special-status species may be reduced as compared to the Proposed Project/Proposed Action and would remain less than significant or less than significant with mitigation (MM-BIO-7) under CEQA depending on the species, as described for the Proposed Project/Proposed Action. Impacts under NEPA would be not significant as these measures are already incorporated into WS-California's WDM.

~~**CEQA Conclusion (Brush Rabbit, Red Fox):** Less than significant with mitigation.~~

CEQA Conclusion (Plants and other Wildlife): Less than significant.

NEPA Conclusion: Not significant.

Alternative 3: Non-Lethal Operational WDM

Alternative 3 would be similar to the Proposed Project/Proposed Action; however, only non-lethal operational WDM would be carried out by the CDFA/Counties/WS-California. Lethal WDM of non-special-status species including non-native or feral species would continue to occur but would be conducted by other entities, who may or may not adhere to safety precautions, BMPs, or federal state, and/or local laws. Alternative 2 would likely increase WDM activities by other entities in proportion to the reduction of services previously provided by WS-California. Other entities, including private landowners, would not likely have the expertise, training, equipment (e.g., firearms, I&E drugs, aircraft), or authorization to carry out WDM like WS-California and it is likely that calls for service would go unaddressed. It is likely that this alternative would result in reduced levels of lethal WDM of non-special-status species due to the reduced capacity of private landowners to conduct WDM, but the extent of that reduction is speculative as the future capacity of other entities to conduct lethal WDM is unknown. Take of unprotected mammals by private individuals or their agent is not required to be reported to CDFW or other agencies, resulting in underreporting as compared to the Proposed Project/Proposed Action. Impacts to non-special-status species may be reduced as compared to the Proposed Project/Proposed Action and would remain less than significant or less than significant with mitigation (MM-BIO-7) under CEQA, as described for the Proposed Project/Proposed Action. Impacts under NEPA would be not significant as these measures are already incorporated into WS-California's WDM.

~~**CEQA Conclusion (Brush Rabbit, Red Fox):** Less than significant with mitigation.~~

CEQA Conclusion (Plants and other Wildlife): Less than significant.

NEPA Conclusion: Not significant.

Pages 4.2.2-81 Through 4.2.2-82

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2.5.2 Section 4.2.6, Noise

Page 4.2.6-11

Table 4.2.6-8. Electronic SDistress Sounds Activity - Noise Sources and Sound Levels

Noise Source	Activity Duration Per Installed Device	Use Factor (percent)	Reference Level (L _{max} dBA at 50 feet)	Distance Used to Calculate Receiver Noise Level	Combined Noise Level (L _{eq} 8-hour)
Barking Dog	8 hours	100	60	30 feet	65
Crow Call	8 hours	100	47		

Source: Appendix F RCNM worksheet
dBA = A-weighted decibel

As seen in Table 4.2.6-8, the constant playing of distress sounds based on reference noise levels combined for a dog barking and crow calling could occur at a distance of 30 feet or greater during the daytime and remain in compliance with the HUD standard. This daytime distance is considered sufficient to avoid disturbance to sensitive receptors because planted crops or pastures containing vulnerable livestock (e.g., fowl, young lambs) would not likely be placed within 30 feet of an occupied structure.

Page 4.2.6-12

Table 4.2.6-9 provides the radius distance from electronic distress sounds to sensitive receptors for sound levels that would remain compliant with the U.S. Department of House and Urban Development (HUD) guidance for daytime activity (HUD 2009) and the World Health Organization (WHO) guidance for nighttime activity (Berglund et al. 1999). As seen in Table 4.2.6-9, electronic distress sounds could occur at night at distances from sensitive receptors of 200 feet or greater and would comply with the established guidelines. If sensitive receptors are closer than this distance, then the CDFA and WS-California would implement Mitigation Measure (MM) NOISE-1 (see Section 4.2.6.3.4, Mitigation Measures) to reduce the impact on sensitive receptors between 30 and 200 feet by restricting activity to daytime hours.

Table 4.2.6-9. Electronic SDistress Sounds - Minimum Distances to Comply with Noise Criteria

Activity	Daytime per HUD Guidance (65 dBA L_{eq} 8-hour)	Nighttime per WHO Guidance (45 dBA L_{eq} 8-hour)	Nighttime per WHO Guidance (60 dBA L_{max})
Electronic Stress Sounds	30 feet	200 feet	50 feet

Source: Appendix F RCNM worksheet
HUD = U.S. Department of House and Urban Development; WHO = World Health Organization; dBA = A-weighted decibel

Page 4.2.6-14

As shown in Table 4.2.6-13, the spray application of chemical repellent involving the use of an ATV for access to spray areas could occur at a distance of 35 feet or greater during the daytime and remain in compliance with the HUD standard. This daytime distance is considered sufficient because planted crops sites for which chemical repellent might be spray-applied (e.g., crop fields, golf courses) would not likely be placed within 35 feet of a residence. Chemical repellent spraying would not be conducted at night. MM-NOISE-4 applies to chemical repellent spraying activities and reinforces minimum distance setbacks for this activity during daytime and nighttime periods.

CEQA Conclusion: *Less than significant with mitigation.*

NEPA Conclusion: *Not significant.*

Page 4.2.6-17

Impact 7: Aerial Shooting

Shooting is frequently performed for predators such as coyotes, bobcats, and foxes that have preyed on livestock. Aerial shooting is limited to locations where it is legal and safe to discharge firearms. Aerial shooting is used selectively for target species, but may be relatively expensive because of the use of an aircraft and staff hours required. Wildlife Services uses fixed- and rotary-wing aircraft for aerial WDM activities only in areas under

agreement and focuses efforts only during certain times of the year such as during calving and lambing. Nationally, APHIS-WS annually flies less than 20 min/mi² (this is equivalent to under two seconds per acre), on properties under agreement (USDA 2019). WS-California personnel are trained to avoid non-target wildlife. While adverse reactions to short-duration overflights can occur in wildlife, more serious adverse effects are generally observed in cases of chronic exposure (i.e., flight training facilities, airports, etc.) (USDA 2019). WS-California spends comparatively little time in any one area, making significant impacts to both target and non-target species unlikely (USDA 2019). Low level flights conducted for the removal of damaging individuals, such as a depredating coyote, occur for only brief moments in any given spot. Pursuits are short in duration, generally under a minute, thus minimizing any prolonged stress to the animal, as well as maximizing safety for the air crew members. WS-California does not expect that brief aerial overpasses during WDM will significantly alter wildlife behavior or cause prolonged expenditures of energy reserves. Wildlife Services has concluded that disturbance effects on wildlife are short-lived and negligible and will not cause adverse impacts to non-target species including those that are threatened or endangered. The Airborne Hunting Act allows shooting of animals from aircraft for protection of livestock. A representative aircraft noise level (Cessna 172, a four-seat, single-engine, fixed-wing aircraft) was obtained from the Federal Aviation Administration (FAA 1997); the published sound levels for a 12-gauge shotgun were used to represent gunfire sound levels for aerial shooting. The RCNM (FHWA 2008) was used to evaluate the sound level from aerial shooting.

Page 4.2.6-27

Table 4.2.6-27. Shooting Activity - Firearm Noise Sources List and Nighttime Receptor Noise Results for 30-Minute Shooting Duration

Equipment	Activity Duration Per Site	Use Factor (percent)	Reference Level (Lmax dBA at 50 feet)	Distance per Daytime Nighttime WHO Guidance (45 dBA Leq 8-hour)	With Suppressor Reference Level (Lmax dBA at 50 feet)	With Suppressor Distance per Daytime Nighttime WHO Guidance (45 dBA Leq 8-hour)
.308 Caliber Rifle	0.5 hours	0.11	149	11,000 feet	125	2,000 feet
12-Gauge Shotgun			140	6,500 feet	113	550 feet
.22 Caliber Rifle			129	2,750 feet	105	225 feet
.22 Caliber Rifle (subsonic ammunition)			N/A	N/A	51	1 foot
Daisy Rider BB Gun ^a			73	6 feet	N/A	N/A

Source: Appendix F RCNM worksheet.
 WHO = World Health Organization; dBA = A-weighted decibel; N/A = not applicable
^a This would represent any air rifle.

Page 4.2.6-41

Transportation Research Board, National Research Council. 1971. *Highway Noise: A Design Guide for Highway Engineers (1971)*, National Cooperative Highway Research Program Report 117.

USDA (U.S. Department of Agriculture). 2019. The Use of Aircraft in Wildlife Damage Management. Human Health and Ecological Risk Assessment for the Use of Wildlife Damage Management Methods by USDA-APHIS-Wildlife Services. 1-28.

2.5.3 Section 4.3, Environmental Resources Eliminated from Further Analysis

Page 4.3-9

The Proposed Project/Proposed Action would not result in construction of urbanized development or permanent placement of people in a wildland area and thus would not result in a significant risk of loss, injury, or death involving wildland fires. Additionally, the Wildlife Services Directives summarized above direct that any WDM methods implemented by WS-California personnel that could result in fire hazards, such as pyrotechnics or propane exploders, be subject to oversight and accountability by trained and certified personnel. Federal laws and manufacturer's instructions must also be followed by the CDFA, WS-California, and county wildlife specialists. Activities under the Proposed Project/Proposed Action would also be conducted consistent with federal, state, county, and local regulations related to fire safety and wildfires. Known areas of moderate, high, and very high fire hazard risk would be subject to local regulations and applicable best practices including not using explosives or parking vehicles in dry grass and driving on established roads as much as possible. Therefore, the Proposed Project/Proposed Action would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Proposed Project/Proposed Action impacts related to wildfire would be less than significant.

2.6 Edits to Chapter 7, Acronyms

Pages 7-1 Through 7-3

Acronym/Abbreviation	Definition
AB	Assembly Bill
AI	avian influenza
APHIS	Animal and Plant Health Inspection Service
ATV	All-Terrain Vehicle
AVMA	American Veterinary Medical Association
B	Beneficial
BASH	Bird Air Strike Hazard Program
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BMP	best management practice
BTR	Biological Technical Report
CAL FIRE	California Department of Forestry and Fire Protection
<u>CALTIP</u>	<u>Californians Turn In Poachers and Polluters</u>
Caltrans	California Department of Transportation
CC	Cumulatively Considerable
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife

Acronym/Abbreviation	Definition
<u>CDPH</u>	<u>California Department of Public Health</u>
CDPR	California Department of Pesticide Regulation
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
<u>CESA</u>	<u>California Endangered Species Act</u>
CFR	Code of Federal Regulations
<u>CH₄</u>	<u>methane</u>
<u>CMITS</u>	<u>Controlled Materials Inventory Tracking System</u>
CNEL	Community Noise Equivalent Level
<u>CO₂</u>	<u>carbon dioxide</u>
CSA	Cooperative Service Agreement
<u>CUPA</u>	<u>Certified Unified Program Agency</u>
dB	decibel
dBA	A-weighted decibels
DEA	U.S. Drug Enforcement Administration
DOC	California Department of Conservation
<u>DPS</u>	<u>Distinct Population Segments</u>
<u>DTSC</u>	<u>Department of Toxic Substances Control</u>
EA	environmental assessment
EIR	environmental impact report
EIS	environmental impact statement
<u>EO</u>	<u>Executive Order</u>
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FAC	California Food and Agricultural Code
FBI	Federal Bureau of Investigation
FDA	Food and Drug Administration
<u>FESA</u>	<u>Federal Endangered Species Act</u>
FMMP	Farmland Mapping and Monitoring Project
FONSI	Finding of No Significant Impact
<u>HCP</u>	<u>Habitat Conservation Plan</u>
HUD	Department of House and Urban Development
I&E	immobilization and euthanasia
<u>IME</u>	<u>Institute of Makers of Explosives</u>
in/sec	inches per second
<u>IWG</u>	<u>Interagency Working Group</u>
LCC	Less than Cumulatively Considerable
L _{dn}	day-night average sound level
L _{eq}	equivalent sound level
L _{max}	maximum sound level
LTS	Less than Significant
LTS/M	Less than Significant with Mitigation

Acronym/Abbreviation	Definition
<u>MBTA</u>	<u>Migratory Bird Treaty Act</u>
MIS	California Management Information System
MM	Mitigation Measure
MOU	memorandum of understanding
<u>N₂O</u>	<u>nitrous oxide</u>
NAHC	Native American Heritage Commission
NAICS	North American Industry Classification System
NASAO	National Association of State Aviation Officials
NASS	National Agricultural Statistics Survey
<u>NCCP</u>	<u>Natural Community Conservation Plan</u>
NEPA	National Environmental Policy Act
NI	No Impact
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NPS	National Park Service
NS	Not Significant
<u>OSHA</u>	<u>Occupational Safety and Health Administration</u>
PPE	personal protective equipment
PPV	peak particle velocity
PRC	California Public Resources Code
RCNM	Roadway Construction Noise Model
ROD	Record of Decision
<u>RUP</u>	<u>Restricted Use Products</u>
S	Significant
<u>SC-CH₄</u>	<u>social cost of methane</u>
<u>SC-CO₂</u>	<u>social cost of carbon dioxide</u>
<u>SC-GHG</u>	<u>social cost of greenhouse gases</u>
<u>SC-N₂O</u>	<u>social cost of nitrous oxide</u>
SDA	Special Designation Area
SRA	State Responsibility Area
SSC	Species of Special Concern
SU	Significant and Unavoidable
<u>SWRCB</u>	<u>State Water Resources Control Board</u>
T&E	threatened and endangered
TCP	tribal cultural property
TCR	tribal cultural resource
UCR	Uniform Crime Reporting Program
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
<u>USGS</u>	<u>U.S. Geological Survey</u>
VHF	very high frequency

Acronym/Abbreviation	Definition
<u>WA</u>	<u>Wilderness Area</u>
WDM	wildlife Damage Management
WHM	wildlife hazard management
WHO	World Health Organization
<u>WS</u>	<u>Wildlife Services</u>
WS-California	<u>California Wildlife Services</u>
<u>WSA</u>	<u>Wilderness Study Area</u>

2.7 Edits to Appendix A, Scoping Report

The transcript provided for the October 13, 2021 scoping meeting was a duplicate of the October 27, 2021 scoping meeting transcript. The October 13, 2021 scoping meeting transcript has been replaced with the correct version.

2.8 Edits to Appendix C, WDM Methods

2.8.1 Appendix C-1

4 Wildlife Services Risk Assessments and Directives

In support of WDM activities, WS prepared risk assessments for many of the methods it uses. These formal risk assessments analyze the impacts of WDM methods on human health and the environment. To ensure the scientific rigor, these risk assessments were peer reviewed by non-federal professionals with knowledge of the methods and risks associated with the use of WDM methods. The peer reviewers were selected by the Association of Fish and Wildlife Agencies, the organization of state, provincial, and territorial fish and wildlife agencies in North America entrusted with primary stewardship over vital wildlife resources. The analyses in this Section will reference these risk assessments. Details of individual WS risk assessments can be found at the following website: <https://www.aphis.usda.gov/wildlife-services/publications/nepa/methods-risk-assessments>.

Additionally, all WS employees are required to follow Wildlife Services Program Directives. These directives give guidance and instruction on a variety of management activities and tools to ensure that WS employees provide wildlife damage management solutions that are safe, effective, selective, economically feasible, and environmentally responsible. The directives are reviewed and updated periodically as circumstances evolve to maintain a comprehensive, clear set of policies. WS Directives can be found at the following website: [https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/SA WS Program Directives](https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/SA%20WS%20Program%20Directives).

2.8.2 Appendix C-2

CDFA recognizes the federal expertise in managing wildlife conflicts that Wildlife Services (WS-California) brings to California.^[1] The wildlife damage management (WDM) activities and methods that WS-California *currently* uses are described in detail in Appendix C-1. WS-California Methods Descriptions. Should an individual county enter into a Cooperative Service Agreement (CSA) with WS-California, their WDM would be consistent with the descriptions provided in Appendix C-1.

The following is a description of WDM activities and methods that may be used by CDFA and participating California Counties (and their agents, thereof), *independent* of WS-California. However, these activities and methods directly build upon those previously described, and thus are familiar, proven, and compatible. To ensure consistency in how WDM activities and methods are carried out by CDFA (and participating California Counties), CDFA shall adopt pertinent Wildlife Services Operational Policy Directives adopted prior to any WDM activities being performed by staff~~the Wildlife Services Directives~~ as part of the WDM Program (USDA 2020).

^[1] There are Wildlife Services (WS) offices representing all 50 states, the District of Columbia, Guam, and the Virgin Islands.

2.9 Edits to Appendix D, Biological Technical Report

2.9.1 Section 1.2.1, California Ecoregion Descriptions

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Table 1-2. Target Species Located within each Ecoregion

Ecoregion	Representative Target Species	
<i>Mojave Desert</i>	<ul style="list-style-type: none">▪ Coyote▪ California ground squirrel▪ Desert cottontail▪ Black-tailed jackrabbit▪ Common small rodents▪ American coot	<ul style="list-style-type: none">▪ Red-tailed hawk (<i>Buteo jamaicensis</i>)▪ <u>Common raven (<i>Corvus corax</i>)</u>▪ Cooper’s hawk (<i>Accipiter cooperii</i>)▪ Upland game birds▪ Sparrows and finches▪ European starling

2.9.2 Section 2.3, Wildlife Damage Management Fate Categories

- Sacramento Valley Red fox. On average, 1.5 occupied Sacramento Valley red fox dens were destroyed per year during the MIS baseline analysis period. Nationwide, USDA (2019) estimates that 3.7 Sacramento Valley red fox individuals are lethally removed for each occupied den destroyed. Therefore, a total of 1.5 occupied dens multiplied by 3.7 average individuals per den would result in lethal removal of 5.6 Sacramento Valley red fox individuals per year on average. This number was added to the number of Sacramento Valley red fox in the “killed” fate category to determine the number of Sacramento Valley red fox lethally removed by WS-California as described in Section 3.2.5.

2.9.3 Section 2.7, Special-Status Species that Benefit from WS-California WDM Activities

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Table 2-2. Threatened and Endangered Bird, Reptile, and Mammal Species Intended as Beneficiaries of WS-California Activities (CY2010-2019)

Species Protected	Federal/State Status	Counties Involved ¹
Salt marsh harvest mouse (<i>Reithrodontomys raviventris</i>)	Endangered/Endangered, FP	Solano, Marin, Contra Costa, Alameda, Santa Clara, San Mateo
Sierra Nevada bighorn sheep (<i>Ovis canadensis sierrae</i>)	Endangered/Endangered, FP	Inyo, Mono
California Ridgway's rail (<i>Rallus obsoletus obsoletus</i>)	Endangered/Endangered, FP	Solano, Contra Costa, Alameda, Santa Clara, San Mateo, Marin
Light-footed Ridgway's rail (<i>Rallus obsoletus levipes</i>)	Endangered/Endangered, FP	Ventura, San Diego
Western snowy plover (<i>Charadrius nivosus nivosus</i>)	Threatened/SSC	Marin, Alameda, Contra Costa, Santa Clara, San Mateo, Monterey, Santa Cruz, San Luis Obispo, Santa Barbara, Ventura, San Diego
California least tern (<i>Sternula antillarum browni</i>)	Endangered/Endangered, FP	Alameda, Contra Costa, San Luis Obispo, Ventura, San Diego
California condor (<i>Gymnogyps californianus</i>)	Endangered/Endangered, FP	Kern
Marbled murrelet (<i>Brachyramphus marmoratus</i>)	Threatened/Endangered	Santa Cruz
Desert tortoise (<i>Gopherus agassizii</i>)	Threatened/Threatened	Kern, San Bernardino, Riverside, Los Angeles

Source: USDA 2022b.

Note: FP = Fully Protected; SSC = Species of Special Concern.

¹ Counties where WS-California conducts wildlife damage management to protect threatened and endangered species; such work is separate from and does not imply any involvement by state- and county-level wildlife damage management.

Other special-status species that could benefit from the removal of target species under the Proposed Project may include a wide variety of species ranging from smaller species such as kangaroo rats (*Dipodomys* sp.), arroyo toads (*Anaxyrus californicus*), Mohave ground squirrel (*Xerospermophilus mohavensis*), and Tehachapi slender salamanders (*Batrachoseps stebbinsi*), to medium-sized carnivores such as San Joaquin kit fox (*Vulpes macrotis mutica*), and bird species such as burrowing owl (*Athene cunicularia*). Potential benefits to these species have not been documented by WS-California, but are possible based on the biology of these species and their threats to survival.

2.9.4 Section 3.1, Species with No Further Analysis

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However, all special-status species that are targeted for lethal and non-lethal WDM are examined in Section 3.4, regardless of the percentage of the population affected. For the purposes of this report, we used the following criteria to determine if a non-special status target species required no further analysis:

- 1. If there was no lethal take during the analysis period (i.e., all WDM was nonlethal).
- 2. If the species is considered non-native, domesticated and/or feral in California.
- 3. If there was no lethal take under County programs and average annual lethal take was below 1% of the species’ statewide population during the analysis period.
- 4. If species population could not be determined and lethal take averaged less than 1 individual per year during the analysis period.

...

Available population estimates for the species with no further analysis are provided in Table 3-1. Bird population estimates were derived from a variety of sources, including Partners in Flight’s database (PIF 2022), Global Waterbird Population Estimates 4th Edition, as cited in Cornell Lab of Ornithology 2022), and Breeding Bird Count data 2015-2019 (Sauer *et al.* 2019). Mammal and reptile population estimates were derived from various sources including similar analyses as provided in Appendices C1–C29 (done for muskrat and Botta’s pocket gopher), counts of pairs and pups from the fourseven known wolf packs in California (CDFW ~~2022b~~2024a), and published literature regarding gopher snakes (Rodriguez-Robles 2003) and rattlesnakes (Beck 1995).

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Table 3-1. Average Lethal Wildlife Damage Management Per Year for Species with No Further Analysis

Species	Average Previous Lethal Take ¹	Population Estimate	Lethal Take of Population (%)	Rationale for Elimination from further Analysis
...				
Mammals				
...				
Gray wolf (<i>Canis lupus</i>) ¹⁰	0	47 <u>34</u>	0	No lethal take

Notes: ...

¹⁰ Population estimate includes pairs and pups from the fourseven known wolf packs in California (CDFW ~~2022b~~2024a). Estimate does not include lone wolves or unknown packs.

...

2.7.4 Section 3.2.1, Black Bear

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The statewide modeled population estimate for this species is approximately 20,446 individuals (Appendix C2). ~~This is slightly lower than CDFW's 2023 statewide estimate of 30,000 to 40,000 black bears (CDFW 2023a). More recently, CDFW's Black Bear Conservation Plan for California published in April 2024, estimates a statewide population between 49,549 and 80,935 (2024b).~~ The lowest of these numbers, which is 20,446 black bears in California, will be used as the most conservative estimate. The use of this estimate does not suggest that we doubt or disagree with the CDFW estimate. The population estimate for each county is provided in Appendix C2 and Table 3-2a.

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Legal hunting of black bear averaged 1,423.5 bears killed per year during the 2010 through 2019 seasons (CDFW 2022b). This equates to an average of 7.0% of the estimated statewide population (20,446 individuals). Hunter harvest is the largest source of mortality for black bears among the factors analyzed. At the county level, hunter harvest ranged from zero (many counties) to 142.9 (Shasta County; 12.5% of the estimated population). The recently adopted CDFW Black Bear Conservation Plan (CDFW 2024b) estimated an average hunter harvest of 1,262 bears per year for the 2019 through 2023 seasons, which equates to an average of 6.2% of the estimated statewide population (20,446 individuals). This is a conservative estimate, as the estimated 2019 through 2023 average population in the CDFW Black Bear Conservation Plan is 49,549 to 80,935 individuals, equating to a harvest rate of 1.6% to 2.5% (CDFW 2024b). The greatest of these numbers, which is 7.0% of the estimated statewide population of 20,446, will be used as the most conservative estimate. The use of this estimate does not suggest that we doubt or disagree with the CDFW estimate.

2.9.5 Section 3.2.5, Sacramento Valley Red Fox

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Red fox is a fur bearing mammalian species regulated under CFGC Section 4000. Red foxes can be found in a variety of habitats including lowland valleys, farmlands, semi-desert terrain, coastal wetlands, and urban areas (CWHR 2022). California is home to the non-native red fox (*Vulpes vulpes*) and two native red fox subspecies, the Sierra Nevada red fox (*Vulpes vulpes necator*) and the Sacramento Valley red fox (*Vulpes vulpes patwin*) (CDFW 2022a).

~~The non-native red fox was, as well as the non-native red fox (*Vulpes vulpes*) which have been~~ introduced both purposely (for hunting) and inadvertently (from fur farms) over the years (Lewis *et al.* 1999).

Non-native red foxes have expanded their range exponentially throughout California over the last 100 years as shown in the increase in distribution across counties within the state: 5 counties in 1937 (Grinnell *et al.* 1937), 17 counties in 1975 (Gray 1975), 36 counties in 1993 (Lewis *et al.* 1993), and 46 counties based on the most currently available data (CWHR 2022). Captive breeding of red foxes for pelts during the 1920s to the 1940s likely accounts for the widespread distribution of the species across the State of California (Lewis *et al.* 1999). The non-native red fox populations are not part of the natural fauna of California and are therefore not considered in this analysis. Lethal removal of non-native red fox does not have the potential to negatively impact native wildlife species in California.

The Sierra Nevada red fox occurs in California as two Distinct Population Segments (DPS); The Sierra Nevada DPS and the Southern Cascades DPS. The federally endangered and state threatened Sierra Nevada ~~Distinct Population Segment (DPS)~~ of the Sierra Nevada red fox is only found in subalpine habitat near the Sonora Pass within Tuolumne, Mono, Alpine, Madera, Fresno, and Inyo Counties (USFWS 2021). The population size for the Sierra Nevada DPS is estimated to be approximately 18 to 39 individuals (USFWS 2021). The state threatened Southern Cascades DPS of Sierra Nevada red fox is presumed to be extant within Shasta, Lassen, Plumas, and Tehama Counties and extirpated from the historical Cascade Range within northern California (USFWS 2015; CDFW 2022g). The population size for the Southern Cascades DPS is estimated to be approximately 42 adults (USFWS 2015). WDM activities have the potential to incidentally capture a non-target Sierra Nevada red fox of either DPS if conducted within the subspecies' range (T. Felix, pers. comm. 2022b; CDFG 2005). Neither the Sierra Nevada DPS nor the Southern Cascades DPS of The Sierra Nevada Red-red Fox fox is are not targeted during WDM in California due to its protected status (State Threatened and/or Federal Endangered) ~~in the Sierra Nevada Distinct Population Segment~~ (86 FR 41743; CDFW 2022a). WDM activities targeting other mesopredators have the potential to incidentally capture a non-target Sierra Nevada Red Fox if such activities are performed within ~~the either DPS's subspecies'~~ the either DPS' range. As such, limitations have been placed on WDM methods by CDFW and USFWS within the range of this subspecies which render incidental take extremely unlikely (e.g., 14 CCR 465.5, CDFG 2005; CDFW 2016b; USFWS 2022). Because no Sierra Nevada red fox of either DPS has even been taken by WS-California for WDM, and because there appears to be no potential for future lethal take of Sierra Nevada red fox from WDM given the limitations places by CDFW and USFWS, there is no potential for impact to this subspecies from WDM in California.

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Section 3.2.5.1 Previous Wildlife Damage Management

WDM for red fox within the range of the Sacramento Valley red fox comprises non-lethal activities (i.e., individuals dispersed, freed, radiocollared, immobilized, relocated, or transferred to another custody) and lethal activities (i.e., individuals killed). During the 10-year WS-California MIS baseline, an average of 4.2 red foxes were killed, 0.1 individuals were freed, and 0.1 individuals underwent a transfer of custody per year within the range of the Sacramento Valley red fox. Therefore, under the previous WS-California efforts, WDM affected on average approximately 4.4 individuals per year.¹⁴ Whereas some or all of these foxes might have been non-native or hybrid red fox, subspecies-level identification, which requires genetic analysis, was not conducted. Consequently, we take the most conservative approach by assuming that all take within this range was the Sacramento Valley red fox subspecies. Some take within these counties was eliminated from this list when the exact location was recorded and determined outside of the subspecies' range. This amounted to a total of 13 red foxes from Solano County during the 10-year baseline period (USDA 2022). WS-California MIS baseline WDM for red fox occurred within four counties within the range of the Sacramento Valley red fox across the state with averages ranging from 0.1 to 3.2 individuals per year; most baseline WS-California WDM (90.5%, or 3.8 individuals) occurred within Colusa and Sutter County. Lethal take of red fox accounts for 95.5% (4.2 individuals per year) of the WS-California WDM conducted for this species, and non-lethal WDM accounts for 4.5% (0.2 individuals per year).

Estimates for lethal WDM conducted by individuals or entities other than WS-California (non-WS lethal take) were calculated for each Proposed Project component (county-based, T&E species protection, and airport WHM) and by county (Table 3-6) according to the methods outlined in Section 2.4. The potential for occasional lethal take was also included in counties with no apparent lethal take from this method whenever there was a moderate or high population of the target species and resources were frequently damaged by the target species. These determinations were subjective and qualitative determinations of occasional lethal WDM take (by non-WS-California entities) and were made by WS-California

personnel based on the estimated county populations and resources expected in each county (T. Felix, pers. comm. 2022a). During the 10-year baseline period, statewide lethal take of red fox is estimated at 5.5 individuals annually within the range of the Sacramento Valley red fox. This total is comprised of the WS-California lethal take of 4.2 individuals per year and the non-WS-California estimates for lethal take of 1.3 individuals per year (Table 3-6). These estimates of WDM take were used to estimate cumulative take as well as county-level WDM take for counties without WS-California MIS data. The statewide modeled low population estimate for this subspecies is approximately 228 individuals. The population estimate for each county is provided in Table 3-6. Approximately 2.4% of the statewide population was affected by lethal WDM activities annually.

To account for interannual variation in take, we calculated the standard deviation of the WS-California statewide red fox take through the 10-year analysis period and used it to estimate the 99% confidence interval of WS-California lethal take (average \pm 2.58 standard deviations). We used all red fox take in the state, because the variance would be very high if the smaller data set of only red fox take within the range of the Sacramento Valley red fox was used. The highest value, rounded up to the next integer, was used to represent the 99% confidence high estimate for WS-California lethal take. The relationship of this number to the average lethal take was calculated by dividing the 99% confidence high estimate by the average. This factor, named the 99% Confidence Factor for the analyses in this BTR, was calculated for each species with WS-California lethal take. All known and estimated previous take averages were multiplied by the 99% Confidence Factor to estimate the Proposed Project Maximum Lethal Take Estimate.

For Sacramento Valley red fox, the average is 54.0,^[2] the standard deviation is 10.73, and the 99% confidence high estimate is 81.68, which we rounded up to 82 individuals. The 99% Confidence Factor for Sacramento Valley red fox was $82/54.0 = 1.52$. All estimates of total previous WDM within each county were multiplied by this factor to estimate the high end of future take under the Proposed Project within each county.

[1] Average includes activities that both intentionally and unintentionally affect red fox and all potential WDM methods used by WS-California.

[2] Data for calculating the 99% Confidence Factor includes 10-year averages for all counties, regardless of the number of years those counties had CSAs with WS-California. These averages are not as accurate as the numbers in Table 3-6. This small amount of error was accepted for this calculation.

Section 3.2.5.2 Estimated Future Wildlife Damage Management under the Proposed Project

Future WDM take of red fox within the range of the Sacramento Valley red fox under the Proposed Project is likely to be similar to the total take estimated above on average; however, due to annual variations in WDM, some years might have higher take than others. The total Proposed Project Maximum Lethal Take Estimate is 9 red foxes taken annually within the range of the Sacramento Valley red fox, which represents 4.0% of the Sacramento Valley red fox population. The statewide modeled low population estimate for this subspecies is approximately 228 individuals (Appendix C6). The population estimate for each county is provided in Table 3-6. The Proposed Project Maximum Lethal Take Estimate in proportion to county estimated population ranges from 0% (several counties) to 13.5% (5 individuals of 37 individuals estimated in the Colusa County population). These numbers are all well below the sustainable harvest threshold of 25% of the estimated county populations. The Proposed Project is not expected to reach this level of take in most years.

WS-California take might increase as a percentage of this take due to increases in the number of CSA Counties (i.e., those with contracts with WS-California to conduct WDM), up to this total annual average of lethal take of 9 within the range of the Sacramento Valley red fox. The proportion of take associated with county- and CDFA-directed

programs also might increase, up to a maximum annual average of the total lethal take of 9 individuals. The maximum number of red foxes taken within the range of the Sacramento Valley red fox by county-level programs are listed for each county in Table 3-6, under the “Proposed Project Maximum Lethal Take Estimate” column. These changes depend upon the Alternative chosen by the Agencies, which is outside the scope of this Report. These potential differences will be discussed in the EIR/EIS.

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Section 3.2.5.4 Potential Cumulative Effects to the Species

Other anthropogenic factors that can affect Sacramento Valley red fox are habitat loss from development and climate change, and disruption by human activities such as conversion of native grasslands to agricultural lands and farming activities. This Report does not directly assess the potential for these factors to add to anthropogenic mortality in Sacramento Valley red fox quantitatively because (1) such effects are included in our population estimation method, which is based on actual available habitat, (2) these effects are not expected to significantly increase red fox mortality in the near future, (3) and a current focus of CDFW is the limitation of future habitat loss and the reversal of past habitat fragmentation (CDFW 2023c). As such, habitat loss and fragmentation are not likely to be significant additional factors affecting the future populations of Sacramento Valley red fox in California (those potential current impacts are not expected to significantly increase during the life of the Proposed Project).

CFGF Section 4152 historically stated (i.e., during the Project’s 10-year baseline period) that red fox, that are not the native Sierra Nevada red fox subspecies, found to be taking livestock or damaging property may be taken at any time or in any manner. There are no trapping or hunting data for red fox collected by CDFW. In absence of that information, we estimate that hunter take of gray fox (1.8% of the population) is similar, or 4.1 individuals per year based on a population of 228 Sacramento Valley red fox.

The number of Sacramento Valley red foxes killed by collisions with vehicles (roadkill) in California is unknown; we found no quantitative data on this source of mortality. The California Roadkill Observation System (CROS 2023) contains these data but the entity that owns the data asserts that they are proprietary. Roadkill data from the California Department of Transportation (Caltrans) were not available and we are aware of no other source of available Sacramento Valley red fox roadkill data in California. Therefore, we estimated Sacramento Valley red fox mortality from vehicle collisions using the highest percentage we calculated among all species and methods in this Report: 1.2% of the population (for mountain lion, see Section 3.2.24).

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Table 3-6. Sacramento Valley Red Fox Annual Average Lethal Wildlife Damage Management under the Proposed Project and Cumulative Mortality Estimates by County and Statewide

County	County-Based Average Per Year		T&E Species Protection Average Per Year		Airports Average Per Year		Total Average Lethal Take Per Year				Proposed Project Max Cumulative Annual Lethal Take Estimate ³	Low Population Estimate ⁴	Maximum % of Population Proposed Project Lethal Take	Maximum % of Population Cumulative Lethal Take
	WS Lethal Take ¹	Non-WS Lethal Take Estimate ¹	WS Lethal Take ¹	Non-WS Lethal Take Estimate ¹	WS Lethal Take ¹	Non-WS Lethal Take Estimate ¹	WS Lethal Take ¹	Non-WS Lethal Take Estimate ¹	Total ¹	Proposed Project Max Annual Lethal Take Estimate ²				
BUTTE	0.3	0	0	0	0	0	0.3	0	0.3	1	3	29	3.4%	10.3%
...														

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2.9.6 Section 3.2.9.2, Estimated Future Wildlife Damage Management under the Proposed Project

Future WDM take of river otter under the Proposed Project is likely to be similar to the total take estimated above on average; however, due to annual variations in WDM, some years might have higher take than others. The total Proposed Project Maximum Lethal Take Estimate is 15.2 river otter taken annually, which represents 1.7% of the population. The statewide modeled low population estimate for this species is approximately 896 individuals (Appendix C10). The population estimate for each county is provided in Table 3-10. The Proposed Project Maximum Lethal Take Estimate in proportion to county estimated population ranges from 0% (several counties) to 13.0% (0.4 individuals of 3 estimated county population; Lake County). However, the low population estimate for river otter in Lake County is only 3 individuals, which is not consistent with local reports that include them occupying boat docks around the Clear Lake shoreline, with up to 11 otters described on a single dock.¹³ Similarly, the low population estimate for river otter in Marin County based on the analysis presented in Appendix C10 using CDFW habitat suitability modeling is 0 individuals, whereas data suggest a recovering population of at least 73 individuals across 14 sites (Carroll et al. 2020). The next highest Proposed Project Maximum Lethal Take Estimate by estimated county population is Yuba County with 9.2% (1.6 individuals of 17 estimated county population) (Table 3-10). These numbers are all well below the sustainable harvest threshold of 20% of the estimated county populations. The Proposed Project is not expected to reach this level of take in most years.

2.9.7 Chapter 4, Non-Target Species Impact

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Table 4-1. Average Annual Non-Target Individuals Captured by Wildlife Services in California during Wildlife Damage Management (CY 2010-2019)

Species	Average Non-Target Non-Lethal Capture	Average Non-Target Lethal Take
...		
<u>Grey wolf</u>	<u>0</u>	<u>0</u>
...		

2.9.8 Chapter 5, Summary of Wildlife Damage Management by County

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Section 5.1.1 Alameda

Baseline WS-California lethal WDM activities for the Alameda County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved four bird species and 12 mammal species:

¹³ <https://www.record-bee.com/2016/02/24/otters-a-common-sight-at-clear-lake/>

Birds: American coot, Canada goose, rock pigeon, and wild turkey

Mammals: coyote, gray fox, red fox (~~non-native~~), mountain lion, deer mouse, Virginia opossum, cottontail, raccoon, black rat, striped skunk, fox squirrel, and feral swine

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Section 5.1.4 Butte

Baseline WS-California lethal WDM activities for the Butte County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved 9 bird species and 16 mammal species:

Birds: Brewer's blackbird, red-winged blackbird, brown-headed cowbird, American crow, Canada goose, rock pigeon, house sparrow, European starling, and wild turkey.

Mammals: Black bear, North American beaver, bobcat, feral cat, coyote, mule deer/black-tailed deer, gray fox, red fox (Sacramento Valley), mountain lion, muskrat, Virginia opossum, river otter, raccoon, striped skunk, California ground squirrel, and feral swine.

Table 5-7. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Butte County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate ¹	Low Population Estimate ²	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox (<u>Sacramento Valley</u>)	0.3	1	29	3.4%	3	10.3%	25%
...							

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Section 5.1.6 Colusa

Baseline WS-California lethal WDM activities for the Colusa County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved one bird species and 14 mammal species:

Birds: rock pigeon

Mammals: North American beaver, feral cat, coyote, feral dog, gray fox, red fox (Sacramento Valley), mountain lion, muskrat, Virginia opossum, raccoon, brown rat, striped skunk, California ground squirrel, and feral swine.

Table 5-11. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Colusa County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate ¹	Low Population Estimate ²	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox (<u>Sacramento Valley</u>)	3.2	5	37	13.1%	8	21.6%	25%
...							

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Section 5.1.7 Contra Costa

Baseline WS-California lethal WDM activities for the Contra Costa County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved 5 bird species and 9 mammal species:

Birds: feral duck, feral pea fowl, Canada goose, common raven, wild turkey

Mammals: North American beaver, coyote, mule deer/black-tailed deer, gray fox, red fox (non-native), Virginia opossum, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.11 Kern

Baseline WS-California lethal WDM activities for the Kern County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved nine bird species and fifteen mammal species:

Birds: American coot, American crow, common barn owl, great horned owl, rock pigeon, common raven, house sparrow, European starling, and acorn woodpecker.

Mammals: Black bear, American badger, North American beaver, bobcat, coyote, feral dog, gray fox, red fox (non-native), black-tailed jackrabbit, mountain lion, Virginia opossum, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.14 Madera

Baseline WS-California lethal WDM activities for the Madera County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two bird species and 15 mammal species:

Birds: American crow, wild turkey.

Mammals: American badger, black bear, North American beaver, bobcat, coyote, feral dog, gray fox, red fox (non-native), mountain lion, Virginia opossum, feral rabbit, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.17 Merced

Baseline WS-California lethal WDM activities for the Merced County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved five bird species and 12 mammal species:

Birds: brown-headed cowbird, cattle egret, black-crowned night heron, common raven and European starling.

Mammals: North American beaver, bobcat, coyote, gray fox, red fox (non-native), mountain lion, nutria, Virginia opossum, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.18 Modoc

Baseline WS-California lethal WDM activities for the Modoc County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two bird species and 15 mammal species:

Birds: common raven and rock pigeon.

Mammals: American badger, black bear, North American beaver, bobcat, coyote, red fox (non-native), mountain lion, muskrat, raccoon, black rat, brown rat, spotted skunk, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.19 Monterey

Baseline WS-California lethal WDM activities for the Monterey County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved eight bird species and 12 mammal species:

Birds: Brewer's blackbird, American coot, American crow, feral duck, Canada goose, California gull, cliff swallow, and wild turkey.

Mammals: North American beaver, bobcat, coyote, red fox (non-native), black-tailed jackrabbit, mountain lion, Virginia opossum, cottontail rabbit, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.25 San Joaquin

Baseline WS-California lethal WDM activities for the San Joaquin County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved five bird species and 14 mammal species:

Birds: Eurasian collared dove, common pea fowl, rock pigeon, European starling, and Canada goose.

Mammals: North American beaver, feral cat, coyote, mule deer, gray fox, red fox (non-native), muskrat, nutria, Virginia opossum, river otter, raccoon, striped skunk, fox squirrel, and California ground squirrel.

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Section 5.1.26 San Luis Obispo

Baseline WS-California lethal WDM activities for the San Luis Obispo County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved four bird species and 15 mammal species:

Birds: Heermann's gull, common raven, wild turkey, and red-tailed hawk.

Mammals: American badger, black bear, North American beaver, bobcat, coyote, mule deer, gray fox, red fox (non-native), mountain lion, Virginia opossum, desert cottontail rabbit, raccoon, striped skunk, California ground squirrel and feral swine.

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Section 5.1.27 Santa Barbara

Baseline WS-California lethal WDM activities for the Santa Barbara County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two bird species and 10 mammal species:

Birds: common raven and cliff swallow.

Mammals: bobcat, coyote, gray fox, red fox (non-native), mountain lion, Virginia opossum, raccoon, striped skunk, California ground squirrel and feral swine.

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Section 5.1.31 Solano

Baseline WS-California lethal WDM activities for the Solano County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved five bird species and nine mammal species:

Birds: American crow, Canada goose, common raven, wild turkey, and feral pigeon.

Mammals: North American beaver, feral cat, coyote, red fox (Sacramento Valley), black-tailed jackrabbit, Virginia opossum, raccoon, striped skunk, and feral swine.

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Table 5-61. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Solano County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate ¹	Low Population Estimate ²	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox (<u>Sacramento Valley</u>)	0.1	1	18	5.6%	3	16.7%	25%
...							

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Section 5.1.32 Sonoma

Baseline WS-California lethal WDM activities for the Sonoma County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two bird species and 12 mammal species:

Birds: red-winged blackbird and rock pigeon.

Mammals: American badger, black bear, North American beaver, bobcat, coyote, gray fox, red fox (non-native), mule deer, mountain lion, raccoon, striped skunk, and feral swine.

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Section 5.1.33 Stanislaus

Baseline WS-California lethal WDM activities for the Stanislaus County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved five bird species and 14 mammal species:

Birds: northern flicker, California scrub jay, rock pigeon, European starling, and cliff swallow.

Mammals: North American beaver, bobcat, feral cat, coyote, mule deer, gray fox, red fox (non-native), mountain lion, muskrat, Virginia opossum, raccoon, striped skunk, California ground squirrel, and feral swine.

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Section 5.1.34 Sutter

Baseline WS-California lethal WDM activities for the ~~Stanislaus~~ Sutter County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved one bird species and 11 mammal species:

Birds: rock pigeon

Mammals: North American beaver, coyote, mule deer, gray fox, red fox (Sacramento Valley), black-tailed jackrabbit, muskrat, Virginia opossum, raccoon, striped skunk, and feral swine.

Table 5-67. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Sutter County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate ¹	Low Population Estimate ²	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox <u>(Sacramento Valley)</u>	0.6	1	32	3.1%	3	9.4%	25%
...							

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Section 5.2.5 Placer

Baseline lethal WDM activities for the county-directed Placer County program (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two bird species and four mammal species.

Birds: rock pigeon

Mammals: black bear, North American beaver, bobcat, coyote, mule deer, feral dog, gray fox, red fox (non-native), mountain lion, American mink, Virginia opossum, raccoon, brown rat, striped skunk, fox squirrel, western gray squirrel, and feral swine.

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Section 5.3.2 Glenn

Baseline WS-California lethal WDM activities for ~~Del Norte~~ Glenn County as recorded in the MIS data are minimal, as the County had no CSA and no official county-directed program.

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Table 5-91. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Glenn County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate	Low Population Estimate	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox (<u>Sacramento Valley</u>)	0.8	2	34	5.9%	4	11.8%	25%
...							

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Section 5.3.4 Mono

Baseline WS-California lethal WDM activities for ~~Inyo-Mono~~ County as recorded in the MIS data are minimal, as the County had no CSA and no official county-directed program.

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Section 5.3.7 San Benito

Baseline lethal WDM activities provided by USDA-WS at the request of San Benito County (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved four bird species, one reptile species, and 13 mammal species:

Birds: American coot, American crow, feral duck, cliff swallow

Reptile: western diamondback rattlesnake

Mammals: bobcat, coyote, mule deer, red fox (non-native), black-tailed jackrabbit, mountain lion, Virginia opossum, desert cottontail rabbit, raccoon, brown rat, striped skunk, California ground squirrel, and feral swine.

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Section 5.3.9 San Mateo

Baseline lethal WDM activities provided by USDA-WS at the request of San Mateo County (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved three mammal species (red fox [non-native], raccoon, and striped skunk).

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Section 5.3.12 Tehama

Baseline lethal WDM activities provided by USDA-WS at the request of ~~Santa Cruz~~ Tehama County (not including airport WHM or WDM for T&E species protection) as recorded in the MIS data involved two mammal species: coyote and mountain lion.

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Table 5-111. County-Program Lethal Take and Cumulative Lethal Take of Target Mammal Species Under the Proposed Project in Tehama County

Species	Average County-Program Lethal WDM Take	County-Program Proposed Project Max Lethal Take Estimate ¹	Low Population Estimate ²	County-Program Proposed Project Max Lethal Take Estimate of Population	Proposed Project Max Cumulative Lethal Take Estimate	Proposed Project Max Cumulative Lethal Take Estimate of Population	Sustainable Mortality Estimate
...							
Red Fox (<u>Sacramento Valley</u>)	0.5	1	21	4.8%	3	14.3%	25%
...							

2.9.9 Chapter 7, References

Pages 505 to 506

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~~CDFW. 2024b. Black Bear Conservation Plan for California. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=222075&inline>~~

2.9.10 Attachment A, USFWS Consultation

WS-California consultation history for Section 7 of the federal Endangered Species Act (ESA) as of April 30, 2024.

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
<u>Formal Consult</u>	<u>California Coastal ESU Chinook Salmon</u> <u>Southern Oregon/Northern California Coast ESU Coho Salmon</u> <u>Central California Coast ESU Coho Salmon</u> <u>Central California Coast DPS Steelhead</u> <u>Northern California DPS Steelhead</u> <u>Southern California Coast DPS Steelhead</u> <u>South Central California Coast DPS Steelhead</u> <u>Southern DPS Green Sturgeon Southern DPS Eulachon</u>	<u>Semi-Aquatic Mammal WDM</u>	<u>11/3/2023</u>	<u>In Progress</u>	<u>=</u>	<u>In Progress</u>
<u>Informal Consult</u>	<u>Alameda whipsnake</u> <u>Arroyo toad</u> <u>Blunt-nosed leopard lizard</u> <u>California tiger salamander</u> <u>California clapper rail</u> <u>California condor</u> <u>California least tern</u> <u>Coastal California gnatcatcher</u> <u>Desert tortoise</u> <u>Fresno kangaroo rat</u> <u>Giant garter snake</u> <u>Giant kangaroo rat</u> <u>Least Bell's vireo</u> <u>Light-footed Ridgeway's rail</u> <u>Salt marsh harvest mouse</u> <u>San Bernardino Merriam's kangaroo rat</u> <u>San Joaquin kit fox</u> <u>Southwestern willow flycatcher</u> <u>Stephens' kangaroo rat</u> <u>Tipton kangaroo rat</u> <u>Western snowy plover</u> <u>Yellow-billed cuckoo</u> <u>Yuma Ridgway's rail</u>	<u>Airport Protection, Human Health and Safety</u>	<u>6/14/2021</u>	<u>12/16/2022</u> <u>, amended</u> <u>4/24/2023</u>	<u>=</u>	<u>FWS-SD-22-0070548-S7-I-R001</u>

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
<u>Informal Consult</u>	<u>Sierra Nevada DPS Sierra Nevada red fox</u>	<u>WDM</u>	<u>7/22/2022</u>	<u>9/12/2022</u>	=	<u>2022-0073553</u>
<u>Informal Consult</u>	<u>Sierra Nevada bighorn sheep</u>	<u>Research, T&E Protection</u>	<u>7/2/2021</u>	<u>8/31/2021</u>	=	<u>2021-I-0445</u>
<u>Informal Consult</u>	<u>Desert tortoise</u>	<u>T&E Protection</u>	<u>4/30/2021</u>	<u>8/17/2021</u>	=	<u>FWS-17B0158-21I1352</u>
<u>Formal consult-Update</u>	<u>Gray wolf</u>	<u>WDM</u>	<u>5/1/2020</u>	<u>7/21/2020</u>	=	<u>08ECLA00-2020-F-0072</u>
<u>Formal consult-T&E protection</u>	<u>California clapper rail</u> <u>California least tern</u> <u>Light-footed clapper rail</u> <u>Marbled murrelet</u> <u>Salt marsh harvest mouse</u> <u>Western snowy plover</u>	<u>T&E Protection</u>	<u>5/11/2018</u>	<u>12/8/2018</u>	=	<u>08E00000-2019-F-0001</u>
<u>Informal Consult - Part II</u>	<u>Yellow-billed cuckoo</u>	<u>WDM</u>	<u>5/29/2015</u>	<u>12/15/2015</u>	<u>6/14/2016</u>	<u>08E00000-2016-I-0001</u>
<u>Informal Consult-Part II</u>	<u>California condor</u> <u>Desert tortoise</u> <u>Gray wolf</u>	<u>WDM</u>	<u>5/15/2012</u>	<u>4/15/2014</u>	<u>6/14/2016</u>	<u>08E00000-2014-I-0011</u>
<u>Informal Consult-Part II</u>	<u>Alameda whipsnake</u> <u>Amargosa vole</u> <u>Arroyo toad</u> <u>Blunt-nosed leopard</u> <u>Buena Vista lake shrew</u> <u>California red-legged frog</u> <u>California tiger salamander</u> <u>Coastal California gnatcatcher</u> <u>Coachella Valley fringe-toed lizard</u> <u>Desert slender salamander</u> <u>Fresno kangaroo rat</u>	<u>WDM</u>	<u>2/7/2007</u>	<u>5/8/2007</u>	<u>6/14/2016</u>	<u>CNO-ES</u>

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
	<u>Giant garter snake</u> <u>Giant kangaroo rat</u> <u>Inyo California towhee</u> <u>Morro Bay kangaroo rat</u> <u>Mountain yellow-legged frog</u> <u>Pacific pocket mouse</u> <u>Peninsular bighorn sheep</u> <u>Point Arena mountain beaver</u> <u>Riparian brush rabbit</u> <u>San Bernardino Merriam's kangaroo rat</u> <u>San Clemente loggerhead shrike</u> <u>San Clemente sage sparrow</u> <u>San Francisco garter snake</u> <u>San Joaquin kit fox</u> <u>San Joaquin Valley woodrat</u> <u>Santa Cruz long-toed salamander</u> <u>Short-tailed albatross</u> <u>Sierra Nevada bighorn sheep</u> <u>Stephens' kangaroo rat</u> <u>Tipton kangaroo rat</u> <u>Fishes & Invertebrates</u>					
<u>Informal Consult-Central District</u>	<u>Alameda whipsnake</u> <u>Aleutian Canada goose</u> <u>Amargosa vole</u> <u>American peregrine falcon</u> <u>Bald eagle</u> <u>Blunt-nosed leopard lizard</u> <u>California brown pelican</u> <u>California clapper rail</u> <u>California condor</u> <u>California least tern</u> <u>California red-legged frog</u> <u>California tiger salamander</u> <u>Desert tortoise</u>	<u>Programmatic</u>	<u>2/26/1997</u>	<u>2/27/1997</u>	=	<u>1-1-97-l-831</u>

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
	<u>Fresno kangaroo rat</u> <u>Giant garter snake</u> <u>Giant kangaroo rat</u> <u>Inyo brown towhee</u> <u>Least Bell's vireo</u> <u>Mountain plover</u> <u>Riparian brush rabbit</u> <u>Salt marsh harvest mouse</u> <u>San Joaquin Valley woodrat</u> <u>San Joaquin kit fox</u> <u>Southwestern willow flycatcher</u> <u>Tipton kangaroo rat</u> <u>Western snowy plover</u> <u>Fishes, Invertebrates, and Plants</u>					
<u>Informal Consult-San Luis/South District</u>	<u>Aleutian Canada goose</u> <u>American peregrine falcon</u> <u>Arctic peregrine falcon</u> <u>Arroyo toad</u> <u>Bald eagle</u> <u>Blunt-nosed leopard lizard</u> <u>California brown pelican</u> <u>California clapper rail</u> <u>California condor</u> <u>California least tern</u> <u>California red-legged frog</u> <u>California tiger salamander</u> <u>Coachella Valley fringe-toed lizard</u> <u>Coastal California gnatcatcher</u> <u>Desert slender salamander</u> <u>Desert tortoise</u> <u>Flat-tailed horned lizard</u> <u>Giant kangaroo rat</u> <u>Green sea turtle</u> <u>Guadalupe fur seal</u>	<u>Programmatic</u>	<u>6/5/1997</u>	<u>6/20/1997</u>	<u>=</u>	<u>1-1-97-I-1579</u>

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
	<u>Island night lizard</u> <u>Least Bell's vireo</u> <u>Leatherback sea turtle</u> <u>Loggerhead sea turtle</u> <u>Marbled murrelet</u> <u>Morro Bay kangaroo rat</u> <u>Mountain plover</u> <u>Olive Ridley sea turtle</u> <u>Pacific pocket mouse</u> <u>Peninsular bighorn sheep</u> <u>Riparian brush rabbit</u> <u>Salt marsh harvest mouse</u> <u>San Bernardino Merriam's kangaroo rat</u> <u>San Clemente loggerhead shrike</u> <u>San Clemente sage sparrow</u> <u>San Francisco garter snake</u> <u>San Joaquin kit fox</u> <u>San Joaquin Valley woodrat</u> <u>Santa Cruz long-toed salamander</u> <u>Southern sea otter</u> <u>Southwestern willow flycatcher</u> <u>Steller sea lion</u> <u>Stephens' kangaroo rat</u> <u>Tipton kangaroo rat</u> <u>Western snowy plover</u> <u>Yuma clapper rail</u> <u>Fishes, Invertebrates, and Plants</u>					

RESPONSES TO COMMENTS

<u>Document Type</u>	<u>Species Reviewed</u>	<u>Program Activity</u>	<u>Date Submitted</u>	<u>Date Completed</u>	<u>Date Reconfirmed</u>	<u>File Number</u>
<u>Informal Consult-North District</u>	<u>Aleutian Canada goose</u> <u>American peregrine falcon</u> <u>Bald eagle</u> <u>California brown pelican</u> <u>California red-legged frog</u> <u>Marbled murrelet</u> <u>Northern spotted owl</u> <u>Point Arena mountain beaver</u> <u>Western snowy plover</u> <u>Fishes, Invertebrates, and Plants</u>	<u>Programmatic</u>	<u>9/30/1996</u>	<u>10/18/1996</u>	=	<u>1-1-96-I-1795</u>
<u>Informal Consult-Sacramento District</u>	<u>Aleutian Canada goose</u> <u>American peregrine falcon</u> <u>Bald eagle</u> <u>California brown pelican</u> <u>California clapper rail</u> <u>California red-legged frog</u> <u>Giant garter snake</u> <u>Marbled murrelet</u> <u>Northern spotted owl</u> <u>Salt marsh harvest mouse</u> <u>Western snowy plover</u> <u>Fishes, Invertebrates, and Plants</u>	<u>Programmatic</u>	<u>10/3/1996</u>	<u>10/31/1996</u>	=	<u>1-1-97-I-98</u>
<u>Formal Consult-National</u>	<u>Aleutian Canada goose</u> <u>American peregrine falcon</u> <u>Bald eagle</u> <u>California brown pelican</u> <u>California clapper rail</u> <u>California condor</u> <u>California least tern</u> <u>Desert tortoise</u> <u>Light-footed clapper rail</u> <u>Morro Bay kangaroo rat</u> <u>Salt marsh harvest mouse</u> <u>San Joaquin kit fox</u>	<u>National Programmatic</u>	<u>3/27/1990</u>	<u>1990</u>	=	=

RESPONSES TO COMMENTS

Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
<u>Internal Section 7</u>	<u>Aleutian Canada goose</u> <u>American peregrine falcon</u> <u>Bald eagle</u> <u>Blunt-nosed leopard lizard</u> <u>California brown pelican</u> <u>California condor</u> <u>California clapper rail</u> <u>California least tern</u> <u>Desert slender salamander</u> <u>Fresno kangaroo rat</u> <u>Island night lizard</u> <u>Light-footed clapper rail</u> <u>Morro Bay kangaroo rat</u> <u>Salt marsh harvest mouse</u> <u>San Clemente loggerhead shrike</u> <u>San Clemente sage sparrow</u> <u>San Francisco garter snake</u> <u>San Joaquin kit fox</u> <u>Santa Barbara sparrow</u> <u>Santa Cruz long-toed salamander</u> <u>Southern sea otter</u> <u>Yuma clapper rail</u> <u>Fishes, Invertebrates, and Plants</u>	<u>National Programmatic</u>	<u>6/5/1978</u>	<u>7/28/1978</u>	=	=

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
Informal Consult	Arroyo Toad California Tiger Salamander California Clapper Rail California Condor California Least Tern	Airport Protection, Human Health and Safety	6/14/2021	12/16/2022, amended 4/24/2023	—	FWS SD-22-0070548 S7-1R001

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	Coastal California Gnatcatcher Least Bell's Vireo Light footed Ridgeway's Rail Southwestern Willow Flycatcher Western Snowy Plover Yellow billed Cuckoo Yuma Ridgeway's Rail Fresno Kangaroo Rat Giant Kangaroo Rat Salt Marsh Harvest Mouse San Bernardino Merriam's Kangaroo Rat San Joaquin Kit Fox Stephens' Kangaroo Rat Tipton Kangaroo Rat Alameda Whipsnake Blunt nosed Leopard Lizard Desert Tortoise Giant Garter Snake					
Informal Consult	Sierra Nevada DPS Sierra Nevada Red Fox	WDM	7/22/2022	9/12/2022	—	2022-0073553
Informal Consult	Sierra Nevada Bighorn Sheep	Research, T&E Protection	7/2/2021	8/31/2021	—	2021-10445
Informal Consult	Desert Tortoise	T&E Protection	4/30/2021	8/17/2021	—	FWS-17B0158-2111352
Formal consult-Update	Gray Wolf (inc juvs)	WDM	5/1/2020	7/21/2020	—	08ECLA00-2020 F 0072
Formal consult T&E protection	California Clapper Rail California Least Tern Light footed Clapper Rail Salt marsh Harvest Mouse	T&E Protection	5/11/2018	12/8/2018	—	08E00000-2019 F 0001

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	Western Snowy Plover Marbled Murrelet					
Informal Consult— Part II	Yellow-billed Cuckoo	WDM	5/29/2015	12/15/2015	6/14/2016	08E00000- 2016+0001
Informal Consult— Part II	California Condor Gray Wolf Desert Tortoise	WDM	5/15/2012	4/15/2014	6/14/2016	08E00000- 2014+0011
Informal Consult— Part II	Short-tailed Albatross Coastal California Gnatcatcher San Clemente Loggerhead Shrike San Clemente Sage Sparrow Peninsular Bighorn Sheep Sierra Nevada Bighorn Sheep Point Arena Mountain Beaver San Bernardino Merriam's Kangaroo Rat San Joaquin Kit Fox (Leg-snare) Tipton Kangaroo Rat Stephen's Kangaroo Rat Buena Vista Lake Shrew Fresno Kangaroo Rat Giant Kangaroo Rat Morro Bay Kangaroo Rat Pacific Pocket Mouse California Red-legged Frog California Tiger Salamander Santa Cruz Long-toed Salamander Alameda Whipsnake Blunt-nosed Leopard Lizard Coachella Valley Fringe-toed Lizard Giant Garter Snake Amargosa Vole Inyo California Towhee	WDM	2/7/2007	5/8/2007	6/14/2016	CNO-ES

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	Arroyo Toad Desert Slender Salamander Mountain Yellow-legged Frog Riparian (San Joaquin Valley) Woodrat Riparian Brush Rabbit San Francisco Garter Snake fish & inverts					
Informal Consult Central District	Aleutian Canada Goose* American Peregrine Falcon** Bald Eagle* California Brown Pelican*** California Clapper Rail*** California Least Tern*** California Condor** Least Bell's Vireo Mountain Plover Southwestern Willow Flycatcher Western Snowy Plover Inyo Brown Towhee Amargosa Vole Fresno Kangaroo Rat*** Giant Kangaroo Rat*** Riparian Brush Rabbit Salt Marsh Harvest Mouse*** San Joaquin Valley Woodrat San Joaquin Kit Fox** Tipton Kangaroo Rat*** Alameda Whipsnake Blunt nosed Leopard Lizard* Desert Tortoise* Giant Garter Snake California Red-legged Frog California Tiger Salamander	Programatic	2/26/1997	2/27/1997	—	1-197-1831

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	fish, inverts, plants					
Informal Consult-San Luis/South Dist	<p>Aleutian Canada Goose*</p> <p>American Peregrine Falcon**</p> <p>Arctic Peregrine Falcon***</p> <p>Bald Eagle*</p> <p>California Brown Pelican***</p> <p>California Clapper Rail***</p> <p>California Least Tern***</p> <p>California Condor**</p> <p>Least Bell's Vireo</p> <p>Mountain Plover</p> <p>Southwestern Willow Flycatcher</p> <p>Western Snowy Plover</p> <p>San Clemente Loggerhead Shrike</p> <p>San Clemente Sage Sparrow</p> <p>Coastal California Gnatcatcher</p> <p>Marbled Murrelet</p> <p>Yuma Clapper Rail</p> <p>Giant Kangaroo Rat***</p> <p>Morro Bay Kangaroo Rat***</p> <p>Tipton's Kangaroo Rat***</p> <p>Pacific Pocket Mouse</p> <p>Riparian Brush Rabbit</p> <p>Salt Marsh Harvest Mouse***</p> <p>San Joaquin Valley Woodrat</p> <p>San Joaquin Kit Fox**</p> <p>Southern Sea Otter</p> <p>Steller Sea Lion</p> <p>Stephen's Kangaroo Rat</p> <p>Guadalupe Fur Seal</p> <p>Peninsular Bighorn Sheep</p> <p>San Bernardino Merriam's Kangaroo Rat</p> <p>Blunt nosed Leopard Lizard*</p>	Programatic	6/5/1997	6/20/1997	—	11971579

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	Coachella Valley Fringe-toed Lizard Desert Tortoise* Mohave Desert population of Desert Tortoise Flat-tailed Horned Lizard Green Sea Turtle*** Island Night Lizard* Leatherback Sea Turtle*** Loggerhead Sea Turtle*** Olive Ridley Sea Turtle*** San Francisco Garter Snake* Arroyo Southwestern Toad California Red-legged Frog California Tiger Salamander Desert Slender Salamander Santa Cruz Long-toed Salamander fish, inverts, plants					
Informal Consult-North District	Aleutian Canada Goose American Peregrine Falcon Bald Eagle California Brown Pelican Western Snowy Plover Northern Spotted Owl Marbled Murrelet Point Arena Mountain Beaver California Red-legged Frog fish, inverts, plants	Programatic	9/30/1996	10/18/1996	—	1-196-1795
Informal Consult-Sacramento District	Aleutian Canada Goose American Peregrine Falcon Bald Eagle California Brown Pelican California Clapper Rail Western Snowy Plover	Programatic	10/3/1996	10/31/1996	—	1-197-198

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	Northern Spotted Owl Marbled Murrelet Salt Marsh Harvest Mouse Giant Garter Snake California Red-legged Frog fish, inverts, plants					
Formal Consult-National	Morro Bay Kangaroo Rat — MA Salt Marsh Harvest Mouse — MA San Joaquin Kit Fox — MA Aleutian Canada Goose — MA American Peregrine Falcon — MA Bald Eagle — MA Brown Pelican — MA California Clapper Rail — MA California Condor — MA California Least Tern — MA Light footed Clapper Rail — MA Desert Tortoise — MA	National Programatic	3/27/1990	1990	—	
Internal Section 7	San Joaquin Kit Fox — NLTJ Salt Marsh Harvest Mouse — NLTJ Southern Sea Otter — NLTJ Morro Bay Kangaroo Rat — NLTJ Fresno Kangaroo Rat — NLTJ California Condor — NLTJ Bald Eagle — NLTJ American Peregrine Falcon — NLTJ Aleutian Canada Goose — NLTJ California Brown Pelican — NLTJ California Clapper Rail — NLTJ Light footed Clapper Rail — NLTJ Yuma Clapper Rail — NLTJ Santa Barbara Sparrow — NLTJ	National Programatic	6/5/1978	7/28/1978	—	

Section 7 Requests						
Document Type	Species Reviewed	Program Activity	Date Submitted	Date Completed	Date Reconfirmed	File Number
	California Least Tern — NLTJ San Clemente Loggerhead Shrike — NLTJ San Clemente Sage Sparrow — NLTJ Blunt nosed Leopard Lizard — NLTJ Desert Slender Salamander — NLTJ Santa Cruz Long-toed Lizard — NLTJ San Francisco Garter Snake — NLTJ Island Night Lizard — NLTJ Fish, invertebrates, plants					

2.9.11 Attachment C6, Sacramento Valley Red Fox Population and Distribution

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Table 3. Native Subspecies Red Fox Home Range Sizes and Population Densities from the Literature

Literature Source	Tracking Method	Home Range Size Estimation Method	Location	Home Range Overlap Between Sexes	Home Range Size (km ²)	Population Density (individuals/km ²)
Black et al. 2018	camera traps	NA	Sacramento Valley, California	ND	ND	0.4 (theoretical maximum) ¹
Perrine 2005	radio telemetry	95% MCP	Lassen National Park, California	ND	33.0 (n=5) ⁽²⁾	0.016 (5 foxes in 311.5 km ²)
Sacks, B.J., unpublished data	unknown	unknown	Sacramento Valley, California	unknown	3-5	ND

Table 3. Native Subspecies Red Fox Home Range Sizes and Population Densities from the Literature

Literature Source	Tracking Method	Home Range Size Estimation Method	Location	Home Range Overlap Between Sexes	Home Range Size (km ²)	Population Density (individuals/km ²)
(cited in Black et al. 2018)						
Quinn et al. 2019	spatial capture-recapture	NA	Central Sierra Nevada, California	ND	ND	0.04

Notes: NA = not applicable; ND = Not Determined; MCP = minimum convex polygon.

¹ This density estimate was not used in the average because it represents a theoretical maximum, not an estimate of current density.

² This home range estimate was not used in the average because it is for a different subspecies (Sierra Nevada red fox) which lives in very different environments. Estimates were limited to data on the Sacramento Valley red fox.

2.10 Edits to Appendix E, Update Concerning Tribal Coordination for the California Wildlife Damage Management EIR/EIS

A new memorandum dated April 30, 2024, was added to the beginning of Appendix E to provide an update on consultation with interested Tribes:

MEMORANDUM

Subject: Update Concerning Tribal Coordination for the California Wildlife Damage Management EIR/EIS

Date: April 30, 2024

This memorandum updates the previous memorandum dated May 26, 2021, regarding tribal coordination for the California Wildlife Damage Management EIR/EIS. The previous memorandum was completed prior to scheduling of consultation meetings with the interested Tribes.

CDFA, WS-California, and Dudek staff participated in consultation meetings with the following Tribes:

- Fernandeño Tataviam Band of Mission Indians – 7/20/2021
- Rincon Band of Luiseño Indians – 7/21/2021
- Nor Rel Mik Wintu Nation - 7/26/2021
- KaKoon Ta Ruk Band of Ohlone-Costanoan Indians – 8/4/2021
- Federation Indians of Graton Rancheria – 9/14/2021
- Fernandeño Tataviam Band of Mission Indians (second call) – 3/14/2023

As discussed in the EIR/EIS, the Counties, WS-California, and the CDFA shall maintain contact with Tribes that requested notification, and will provide county-level annual reports of Proposed Project/Proposed Action activities to Tribes by request.

2.11 Edits to Appendix F, Noise Technical Report

2.11.1 Section 3.2.1.1, Electronic Distress Sounds

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Table 8. Electronic ~~S~~Distress Sounds Activity – Noise Sources and Sound Levels

Noise Source	Activity Duration Per Installed Device	Use Factor (percent)	Reference Level (L _{max} dBA at 50 feet)	Distance Used to Calculate Receiver Noise Level	Combined Noise Level (L _{eq} 8-hour)
Barking Dog	8 hours	100	60	30 feet	65

Table 8. Electronic SDistress Sounds Activity - Noise Sources and Sound Levels

Noise Source	Activity Duration Per Installed Device	Use Factor (percent)	Reference Level (L _{max} dBA at 50 feet)	Distance Used to Calculate Receiver Noise Level	Combined Noise Level (L _{eq} 8-hour)
Crow Call	8 hours	100	47		

Source: Appendix A, RCNM worksheet.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels; L_{eq} = equivalent sound level.

Table 9 provides the radius distance from Electronic Distress Sounds activity to sensitive receptors for sound levels that would remain compliant with the U.S. Department of House and Urban Development (HUD) guidance for daytime activity (HUD 2009) and the World Health Organization (WHO) guidance for nighttime activity (Berglund et al. 1999). As seen in Table 8, the constant playing of distress sounds based on reference noise levels combined for a dog barking and crow calling could occur at a distance of 30 feet or greater during the daytime and remain in compliance with the HUD standard.

Table 9. Electronic SDistress Sounds - Minimum Separation Distances to Comply with Noise Criteria

Noise Source	Daytime per HUD Guidance (65 dBA L _{eq} 8-Hour)	Nighttime per WHO Guidance (45 dBA L _{eq} 8-Hour)	Nighttime per WHO Guidance (60 dBA L _{max})
Electronic SDistress Sounds	30 feet	200 feet	50 feet

Source: Appendix A, RCNM worksheet.

Notes: HUD = U.S. Department of Housing and Urban Development; dBA = A-weighted decibels; L_{eq} = equivalent sound level; WHO = World Health Organization; L_{max} = maximum sound level.

According to Table 9, Electronic SDistress Sounds could occur at night, at distances from sensitive receptors of 200 feet or greater and would comply with the established guidelines.

2.11.2 Section 3.2.2.3, Shooting

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Shooting is frequently performed for predators such as coyotes, bobcats, and foxes that have preyed on livestock. Aerial shooting is limited to locations where it is legal and safe to discharge firearms. Aerial shooting is used selectively for target species but may be relatively expensive because of the use of an aircraft and staff hours required. Wildlife Services uses fixed- and rotary-wing aircraft for aerial WDM activities only in areas under agreement and focuses efforts only during certain times of the year such as during calving and lambing. Nationally, APHIS-WS annually flies less than 20 min/mi² (this is equivalent to under two seconds per acre), on properties under agreement (USDA 2019). WS-California personnel are trained to avoid non-target wildlife. While adverse reactions to short-duration overflights can occur in wildlife, more serious adverse effects are generally observed in cases of chronic exposure (i.e., flight training facilities, airports, etc.) (USDA 2019). WS-California spends comparatively little time in any one area, making significant impacts to both target and non-target species unlikely (USDA 2019). Low level flights conducted for the removal of damaging individuals, such as a depredating coyote, occur for only brief moments in any given spot. Pursuits are short in duration, generally under a minute, thus

minimizing any prolonged stress to the animal, as well as maximizing safety for the air crew members. WS-California does not expect that brief aerial overpasses during WDM will significantly alter wildlife behavior or cause prolonged expenditures of energy reserves. Wildlife Services has concluded that disturbance effects on wildlife are short-lived and negligible and will not cause adverse impacts to non-target species including those that are threatened or endangered. The Airborne Hunting Act allows shooting of animals from aircraft for protection of livestock. A representative aircraft noise level (Cessna 172, a four-seat, single-engine, fixed-wing aircraft) was obtained from the Federal Aviation Administration (FAA 1997); the published sound levels for a 12-gauge shotgun (Ammo-to-Go 2019) were used to represent gunfire sound levels for Aerial Shooting. The RCNM (FHWA 2008) was used to evaluate the sound level from Aerial Shooting.

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Table 24. Shooting Activity - Firearm Noise Sources and Nighttime Receptor Noise Results for 8-Hour Shooting Duration

Noise Source	Activity Duration per Site	Use Factor (Percent)	Reference Level (L_{max} dBA at 50 Feet)	Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)	With Suppressor Reference Level (L_{max} dBA at 50 Feet)	With Suppressor Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)
308 caliber rifle	8 hours	0.11	149	18,000 feet	125	5,200 feet
12-gauge shotgun			140	12,500 feet	113	2,000 feet
22 caliber rifle			129	7,000 feet	105	900 feet
22 caliber rifle (subsonic ammunition)			N/A	N/A	51	2 feet
Daisy Rider BB gun ^a			73	25 feet	N/A	N/A

Source: Appendix A, RCNM worksheet.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels; HUD = U.S. Department of House and Urban Development; L_{eq} = equivalent sound level; N/A = not applicable.

^a This would represent any air rifle.

Table 25. Shooting Activity - Firearm Noise Sources and Nighttime Receptor Noise Results for 4-Hour Shooting Duration

Noise Source	Activity Duration per Site	Use Factor (Percent)	Reference Level (L_{max} dBA at 50 Feet)	Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)	With Suppressor Reference Level (L_{max} dBA at 50 Feet)	With Suppressor Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)
308 caliber rifle	4 hours	0.11	149	16,500 feet	125	4,200 feet
12-gauge shotgun			140	11,000 feet	113	1,500 feet
22 caliber rifle			129	5,500 feet	105	650 feet
22 caliber rifle (subsonic ammunition)			N/A	N/A	51	2 feet
Daisy Rider BB gun ^a			73	17 feet	N/A	N/A

Source: Appendix A, RCNM worksheet.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels; HUD = U.S. Department of House and Urban Development; L_{eq} = equivalent sound level; N/A = not applicable.

^a This would represent any air rifle.

Table 26. Shooting Activity - Firearm Noise Sources and Nighttime Receptor Noise Results for 2-Hour Shooting Duration

Noise Source	Activity Duration per Site	Use Factor (Percent)	Reference Level (L_{max} dBA at 50 Feet)	Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)	With Suppressor Reference Level (L_{max} dBA at 50 Feet)	With Suppressor Distance per Daytime Nighttime WHO Guidance (45 dBA L_{eq} 8-Hour)
308 caliber rifle	2 hours	0.11	149	14,500 feet	125	3,200 feet
12-gauge shotgun			140	9,500 feet	113	1,100 feet
22 caliber rifle			129	4,500 feet	105	450 feet
22 caliber rifle (subsonic ammunition)			N/A	N/A	51	1 foot
Daisy Rider BB gun ^a			73	12 feet	N/A	N/A

Source: Appendix A, RCNM worksheet.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels; HUD = U.S. Department of House and Urban Development; L_{eq} = equivalent sound level; N/A = not applicable.

^a This would represent any air rifle.

Table 27. Shooting Activity - Firearm Noise Sources and Nighttime Receptor Noise Results for 30-Minute Shooting Duration

Noise Source	Activity Duration per Site	Use Factor (Percent)	Reference Level (L _{max} dBA at 50 Feet)	Distance per Daytime Nighttime WHO Guidance (45 dBA L _{eq} 8-Hour)	With Suppressor Reference Level (L _{max} dBA at 50 Feet)	w/Suppressor Distance per Daytime Nighttime WHO Guidance (45 dBA L _{eq} 8-Hour)
308 caliber rifle	0.5 hours	0.11	149	11,000 feet	125	2,000 feet
12-gauge shotgun			140	6,500 feet	113	550 feet
22 caliber rifle			129	2,750 feet	105	225 feet
22 caliber rifle (subsonic ammunition)			N/A	N/A	51	1 foot
Daisy Rider BB gun ^a			73	6 feet	N/A	N/A

Source: Appendix A, RCNM worksheet.

Notes: L_{max} = maximum sound level; dBA = A-weighted decibels; HUD = U.S. Department of House and Urban Development; L_{eq} = equivalent sound level; N/A = not applicable.

^a This would represent any air rifle.

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Attachment A

List of Form Letter Submitters

Table A-1. List of Form Letter Submitters

A B	Bridget Barron	David Coleman	Franoise May	Jeannie Boyd	Kathryn Murphy	Louise Savage	Mike Evans	Rina Rubenstein	Suellen Carroll
A. B.	Bridget Martin	David DeWitt	Fred Granlund	Jeannie Pollak	Kathryn Osborn	Lu Shoberg	Mike Honda	Rita Bramhall	Sunil Jotwani
A. Elizabeth Johansen	Bridgett Heinly	David Elkins	Fred Tashima	Jed Raynor	Kathryn Santana	LuAnn McVicker	Mike Maynard	Rita Carlson	Sunyoung Kwak
A. Hernday	Brigid Murphy	David Field	Frederic Tarabout	Jeff Duncan	Kathryn St John	Luci Evanston	Mike Merell	Rita Franco	Susaan Aram
Aarati Joly	Britani German	David Foulger	Frederick Pianalto	Jeff Freedmsan	Kathryn Wild	Lucy Gowrie	Mike Tomlinson	Rita Thio	Susan Beil
Aaron Kenna	Britlyn Coleman	David Gallardo	Frederique Joly	Jeff Frey	Kathy Bilicke	Lucy Hart	Mikhail Vizel	Rob Seltzer	Susan Bill
Aaron Sunshine	Brittany Webb	David Gassman	Frida Merzakhianian	Jeff Fromberg	Kathy Brigger	Lucy Kenyon	Mililani Smythe	Robert Beving	Susan Carlson
Abigail Rizzo	Britton Donaldson	David Griggs	Fumiko Peppin	Jeff Parker	Kathy Clement	Lucy Weltner	Milo Ryder	Robert Blackey	Susan Chapin
Abra Rider	Brooke Southall	David Gutierrez	Gabriela Ramirez	Jeffery Burkhart	Kathy Clements	Lupita Narkevicius	Mimi Abers	Robert Bogart	Susan Cossins
Ad Clayton	Bruce Burns	David Hall	Gabriella Sidhu	Jeffery Garcia	Kathy Cullen	Ivaro de Regil	Mimi Swain	Robert Burk	Susan Haleblan
Adam Bernstein	Bruce Coston	David Hammond	Gabrielle Swanberg	Jeffrey Hemenez	Kathy Fujimoto	Lydia Clifton	Miranda Edison	Robert Cherwink	Susan Hampton
Adene Corns	Bruce England	David Hardy	Gail Blank	Jeffrey Hurwitz	Kathy Govreau	Lyn Doster	Miranda Helly	Robert Cook	Susan Hartley
Adriana Arreola gonzalez	Bruce Grobman	David Hild	Gail Bonaso	Jeffrey Levicke	Kathy Hanson	Lynda Daniels	Miriam Baum	Robert Davenport	Susan Hathaway
Adriana E. Tamayo	Bruce McClenahan	David Howard	Gail Farina	Jeffrey Stone	Kathy Knight	Lynda Harrison	Miriam Faugno	Robert Diebold	Susan Hood
Adrienne Picchi	Bruce Montgomery	David Lin	Gail Ferriera	Jeffrey Weiss	Kathy Kosinski	Lynda Higson	Miriela Cooper	Robert Doucette	Susan King
Adrine Arakelian	Bruce Richman	David Lyons	Gail McMullen	Jenee Bridges	Kathy Linale	Lynda Marin	Misako Hill	Robert Drummond	Susan L Petrella

Table A-1. List of Form Letter Submitters

Aga Kadlubowska	Bryan Rosen	David Mazariegos	Gail Roberts	Jenn Crum	Kathy Marshall	Lynette Brooks	Missie Smith	Robert Eisner	Susan Lavelle
Ah Ho	Bryce King	David Melton	Gail Tinsley	Jennie Cohen	Kathy O'Brien	Lynette K Henderson	Missy Garland	Robert Erlick	Susan LeClair
Ahna-Kristen Backstrom	C Baran	David Osterhoudt	Gary Baxel	Jennifer Abernathy	Kathy Olavarri	Lynette Ridder	Misti Reif	Robert Espinoza	Susan Liebes
Aida Marina	C Deguzman	David Perry	Gary Beckerman	Jennifer Bair	Kathy Rohr	Lynn Alley	Mitch Falkenstern	Robert Frank	Susan McCorry
Aileen Milliman	C E Mone	David Peterson	Gary Carlson	Jennifer Cardoza	Kathy Simington	Lynn Hoang	Mitch Walker	Robert Glover	Susan Pelican
Aixa Fielder	C G	David Pisano	Gary Connaught	Jennifer Castner	Kathy Straedey	Lynn Ice-Krushinsky	Molly Bennett	Robert Haase	Susan Perez
AJ Cho	C Garcia	David Prina	Gary Droeger	Jennifer Deckert	Kathy Weed	Lynn Nardella	Molly Mackin	Robert Hall	Susan Posner
Akiko Tamano	C Gorny	David Ross	Gary Goetz	Jennifer Harris	Katie Brammer	Lynn Patra	Monica Padilla	Robert Johnson	Susan Powers
Al Belmonte	C S	David Roth	Gary Kuehn	Jennifer Harrison	Katie Foltz	Lynn Pique	Monica Ventrice	Robert Keats	Susan Ross
Alan Gonzalez	C Stanik	David Schroeder	Gary Landgrebe	Jennifer Ivester	Katie Franklin	Lynn Strandberg	Monica Yonangitti	Robert Kvaas	Susan Routson
Alan Goodson	C Swenning	David Shannahoff-Khalsa	Gary Michelson	Jennifer Kopczynski	Katie Stewart	Lynne Boynton	Monika Holm	Robert Leyland Monefeldt	Susan Schacher
Alan Schenck	C. C. Nettles	David Soto	Gary Mononi	Jennifer Moran	Katie Thibodeau	Lynne Hargett	Monique Soares	Robert Matlock	Susan Snyder
Alana Kohler	Caitlin Freestone	David Tomb	Gary Pischke	Jennifer Price	Katie Yu	Lynne Jeffries	Mox Ruge	Robert Meier	Susan Stanley
Alana-Patris Lorr	Caleb Ellis	David TWS Gurley	Geness Lorient	Jennifer York	Katie Zukoski	Lynne Olivier	Ms Courtney	Robert Mizar	Susan Trivisonno
Alayna Van Dervort	Caleb Schimke	David Walker	Genevieve Fujimoto	Jenny Hoyer	Katrina Child	Lynne Pateman	Mujon Baghai	Robert Palmer	Susan Wallace
Albe Larsen	Callie Mack	David Wappler	Genevieve Guzman	Jenny Perez	Katya Abbott	M C Russi	Mya Shone	Robert Raven	Susan Watts-Rosenfeld

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Albert Eurs	Calum MacKay	David Wendt	Genevieve Riber	Jeralyn Stindt	Kay Sylvester	M Bushman	Myra Berario	Robert Ricewasser	Susan Weisberg
Alberto Acosta	Camille Gilbert	David Wolf	Genevieve Soares	Jerami Prendiville	Kaylah Sterling	M C Yturralde	Myrian Monnet	Robert Rosenblum	Susan Wheaton
Alberto Reyes	Candace Lebel	Davin Peterson	Geoffrey Eargle	Jeremy Trimm	Kecia Talbot	M Freedman	N Goettler	Robert Sennert	Susan Wold
Alec Taratula	Candace Rocha	Dawn Dulac	Geoffrey Kidd	Jeri Fergus	Keely Berg	M G	Nadine Hatcher	Robert Snyder	Susannah Baxendale
Alejandra Arreguin	Candice Barnett	Dawn Fountain	George F. Klipfel II	Jerid Anderson	Keiko Barrett	M K Bennett	Nadya Schmeder	Robert Spotts	Susanne Madden
Alejandro Artigas	Candice Bryan	Dawn Monteith	George Ferrell	Jerold Tuller	Keil Albert	M Rausch	Nan Schweiger	Robert Stine	Susanne Wood
Alessia Cowee	Candice Toyoda	Dawna Dorcas-Werner	George Ivanov	Jerre Maurer	Keith Bentz	M. Virginia Leslie	Nan Singh-Bowman	Robert Sweezy	Susi Higgins
Alex Garcia	Candy Bowman	Dawson Pan	George Munoz	Jerrilyn Miller	Keith Harris	M.K Russell	Nancy Bast	Robert Underwood	Susie Foot
Alex Weisshaus	Cara O'Neill	Deanna Johnson	George Schneider	Jerry Bunin	Keith Tadler	Maaya Ota	Nancy Berman	Roberta Cordero	Susie Tortell
Alex Zukas	Carey Suckow	Deanna Nielsen	George Steinitz	Jerry Davis	Kelle Erwin	Mabel Gulovsen	Nancy Carter	Roberta Millstein	Susun Godwin
Alexa McMahan	CaRho Bergonia	Deb Federin	Georgene McKinney	Jerry Eckel	Kelley Mcdowell	Madeline Stacy	Nancy Cochren	Roberta Weissglass	Suzanne Becket
Alexa Pallas	Carl Luhning	Deb Kelly	Georgia Goldfarb	Jerry Jezowski	Kelli Leathery	Madeline Wright	Nancy Cohn	Robin Hamlin	Suzanne Cook
Alexander Dunaev	Carl Schellenberg	Debbie Bolsky	Georgia Lynn	Jerry Martien	Kelli Lent	Madison Bartlett	Nancy Eldridge	Robin Reinhart	Suzanne Jones
Alexander Vollmer	Carla Bowman	Debbie Hebrard	Georgia Tattu	Jerry Persky	Kelli Nguyen	Maggie Hughes	Nancy Freedland	Robin Resovich	Suzanne Kunstman
Alexandra Crisafulli	Carla Dalton	Debbie Rajcic	Gerald Shaia	Jerry Schneider	Kelli Ratliff	Maia De Raat	Nancy Garret	Robin Steeves	Suzanne Licht

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Alexandra Hopkins	Carla de Haas	Debbie Rivera	Geraldine Battistessa	Jesse Croxton	Kellie Miller	Maile McGrew-Frede	Nancy Gillis	Robin Van Tassell	Suzanne Marcella Camarillo
Alexandra Lamb	Carla Halle	Debbie Tenenbaum	Geraldine Card	Jesse Greenspan	Kelly Achee	Malcolm Groome	Nancy Gowani	Robin Weirich	Suzanne Nevins
Alexis Georgiou	Carlene Visperas	Debi Griepsma	Geralyn Gulseth	Jessee Greenman	Kelly Ayers	Manuel Correa	Nancy Haiston	Robin Williams	Suzanne Rocca-Butler
Alexis Grone	Carlos Arnold	Deborah Bevilaqua	Geri Johnston	Jessica Chang	Kelly Berry	Mar Milpa	Nancy Hartman	Robyn Johnson	Sylvia Cardella
Alexis Kerr	Carlos F Cabezud	Deborah Birmingham	Gerold Wharton	Jessica Dardarian	Kelly Brannigan	Marc Paez	Nancy Havassy	Robyn Link	Sylvia De Baca
Alice Bidasha	Carlos Nunez	Deborah Burge	Gia Mora	Jessica Dietrich	Kelly Kessl	Marc Talisman	Nancy Heck	Robyn Little	Sylvia Nachlinger
Alice Herwill	Carlos Peeler	Deborah Cosentino	Gianna Abondolo	Jessica Heiden	Kelly Kramer	Marcell Insua	Nancy Keating	Robyn Sherrill	Sylvia Selverston
Alice Neuhauser	Carly Clements Owens	Deborah Ebersold	Gida Naser	Jessica Jean Posner	Kelly LaRose	Marcia Hulberg	Nancy Keleher	Rochelle Phillips	Sylvia Seymour
Alice Nguyen	Carly Ritter	Deborah Filipelli	Gila Wdowinski	Jessica Kirby	Kelly McDowell	Marcia Kolb	Nancy Leech	Rodney Love	Sylvia Shay
Alice Polesky	Carmela Vignocchi	Deborah Frame	Gina Carollo	Jessica Mitchell-Shihabi	Kelly Pieczonka	Marco Cimmino	Nancy Martin	Roger Hollander	Szuszi Tyroler
Alice Weigel	Carmen Carrasco	Deborah Iannizzotto	Gina Colangelo	Jessica Schorr	Kelly Tiefen	Marco M. Khanlian	Nancy Mattoon	Rohana McLaughlin	T. Anne Richards
Alicia Adrian	Carmen Rodriguez	Deborah Kelly	Gina Day	Jessie Medina	Kelly Wood	Marcy Greenhut	Nancy McGraw	Rollin Blanton	Tab Buckner
Alicia Carter	Carol Bostick	Deborah Lancman	Gina Gosparini	Jessie Schnell	Kelsey McCann	Maren Culter	Nancy Nilssen	Romani B	Tai Stillwater
Alicia Lomeli	Carol Cook	Deborah Locksley Burkhart	Gina Halferty	Jesus Manuel Huerta	Ken Arconti	Margaret Adachi	Nancy O'Neill Lombardo	Ron Hansel	Tam Su
Alicia Page	Carol Drake	Deborah McIntosh	Gina Ness	Jeweliette Pearson	Ken Lawson	Margaret Anthony	Nancy Paskowitz	Ron Holman	Tamara Thebert

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Alicia Salazar	Carol Dvora	Deborah Nelson	Gina Ortiz	Jill B.	Ken M	Margaret DeMott	Nancy Polito	Ron Letourneau	Tami Lesser
Alicia Williams	Carol Easton	Deborah Olstad	Gina Sanfilippo	Jill Boyle	Ken Rosen	Margaret Hague	Nancy Reyes	Ron Maxwell	Tami McNeerney
Alisha Nickols	Carol Fusco	Deborah Paul	Gina Wasker	Jill Dahlman	Ken Stack	Margaret Jenkins	Nancy Robinson	Ron Parsons	Tami Phelps
Alison Buist	Carol Gordon	Deborah Peri	Ginger Krautkramer	Jill Mistretta	Ken Wilson	Margaret Kitts	Nancy Schelling	Ronald Bogin	Tami Trearse
Alison Collins	Carol Hewitt	Deborah Santone	Ginger Schedler	Jill Mulato	Kendra Knight	Margaret Levin	Nancy Sidebotham	Ronald Brand	Tammy Bullock
Alison Dice	Carol Holland	Deborah Tash	Giovanna Mayorga	Jill Rhiannon	Kendra Shaffer	Margaret Masek	Nancy Treffry	Ronald Dow	Tammy Hagel
Alison Glennon	Carol Irvine	Deborah Tibbetts	Giovannina Fazio	Jill Stone	Kendra Young	Margaret Pierce	Nanda Currant	Ronald Jacob	Tank Conner
Alison Merkel	Carol Kommerstad	Deborah Y Chew	Gladys Delgadillo	Jillian Spaak	Kenneth Althiser	Margaret Prescod	Nannette Morgan	Ronald Porembski	Tanya Morales
Alison Taylor	Carol Kuelper	Debra Hill	Glen Deardorff	Jillian Unger	Kenneth Lapointe	Margaret Roberts	Naomi Taniguchi	Ronald Ringler	Tanya Thienngern
Allan Campbell	Carol Lane	Debra Jurey	Glenn Garland	Jim Corriere	Kenneth Nahigian	Margaret Sharp	Nat Matos	Ronit Corry	Taochiung Chi
Allan Chen	Carol Lawrence	Debra Leow	Glenn Greff	Jim Cromeenes	Kenneth R Pelletier	Margaret Tollner	Natalia Martinez	Rosalba Cofer	Tara Gahm
Allen Bohnert	Carol Ng	Debra Lichstein	Glenn Stewart	Jim Curland	Kenneth Wilcox	Margaret Wessels	Natalie Aharonian	Rosalie Prieto	Tara Ohta
Allie Palmer	Carol Rigrod	Debra Nichols	Gloria Aguirre	Jim Franzi	Kent Morris	Margarita Gonzalez	Natalie Blasco	Rosann Lynch	Tarun Bishop
Allison Jones	Carol Ruth	Debra Rogers	Gloria Albert	Jim Haley	Kermit Carraway	Margarita Perez	Natasha Hopkinson	Rose Bryan	Tdod Snyder
Allison Martin	Carol Schaffer	Debra Temple	Gloria Sefton	Jim Hughes	Kermit Cuff	Margery Spofford	Natasha Kaluza	Rose Ireland	Ted Hume
Allison Moffett	Carol Sneddon	Debra Wills	Gopal Shanker	Jim Perry	Kerri McGoldrick	Margie Rosenblum	Natasha Saravanja	Rosemary Graham-Gardner	Tem Narvios

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Allison Shore	Carol Taggart	Dee Smallman	Gordon Cook	Jim Rosvall	Kerri Seven-Bergen	Margot Lowe	Natashja Dewolfe	Rosemary Shiolas	Tera Kelley
Allison Souza	Carol Tao	DeeAnn Bradley	Grace Helu-Lara	Jim Spooner	Kerry Duncan	Marguerite Shuster	Nathan Lang	Ross Bullard	Teresa Burgess PhD
Allisyn Snyder	Carol Vallejo	Dehra Iverson	Grace Johnson	Jim Sullivan	Kevin Goodwin	Mari Dominguez	Nathan Miller	Ross Heckmann	Teresa Canode
Ally Tse	Carol Wiley	Deimile Mockus	Grace Pan	Jim Talbot	Kevin Hearle Ph.D.	Mari Huff	Neal Steiner	Ross Neglia	Teresa Hensley
Allyson Finkel	Carola Detrick	Dena Schwimmer	Grace Ramirez	Jim Wilson	Kevin Henry	Mari Matsumoto	Nelson Molina	Roya Arasteh	Teresa Mynko
Almetrez Thomas	Carolann Johnson	Denice Eldridge	Graciela Trevisan	Jimmie Lunsford	Kevin Krywko	Maria Cardenas	Nicholas Esser	Ruben Canonizado	Teresa Naglietti
Alton Cullen	Carole De La Cruz	Denise Andrews	Grayson Torgersen	Jinah Yoon	Kevin Patterson	Maria Fraga	Nicholas Meinhardt	Russell Burke	Teresa Scherzer
Alvaro De Regil	Carole Ehrhardt	Denise Comiskey	Greg C	Jinx Hydeman	Kevin Prendiville	Maria Long	Nicholas Ratto	Russell Stone	Teresa Thompson
Alyce Foster	Carole Garrett	Denise De Stefano	Greg D	JL Angell	Kevin Roe	Maria McCutchan	Nick McNaughton	Russell Weisz	Teresa VanZeller
Alys Hay	Caroline Bering	Denise Edwards	Greg Goodman	Jo Baxter	Kevin Schader	Maria Nowicki	Nicolas Dunn	Ruth Burman	Teresa Weisbecker
Alyza Cornett	Caroline Klarr	Denise Featherstone	Greg Kareofelas	Jo Tolla	Kevin Slauson	Maria Teresa Ferrero	Nicolas Duonn	Ruth Galindo	Teresa Zollars
Amanda Bancroft	Caroline Ko	Denise Filakosky	Greg Kirkman	Jo Young	Kim Altana	Maria Tortu	Nicole Amador	Ruth Gravanis	Teresia Myers
Amanda Mauceri	Caroline Van Haeften	Denise Garza	Greg Korelich	Joan Jacobson	Kim Halizak	Mariam Shah-Rais	Nicole Cervantes	Ruth Stoner Muzzin	Teri Kelly
Amanda Moore	Carolyn Barkow	Denise Hamilton	Greg L Pennington	Joan Kaplan	Kim Koch	Marian Schock	Nicole Fountain	Ryan Davis	Teri Sigler
Amanda Murphy	Carolyn Davis	Denise LaChance	Greg Lowell	Joan Poss	Kim Messmer	Marianna Mejia	Nicole Mikals	Ryan Dell	Terri Alice
Amanda Young	Carolyn Duryea	Denise Meadow	Greg Lyon	Joan Quinn	Kim Nero	Marianna Riser	Nigel Jay	Ryan Gerchick	Terri Decker

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Amanda Zangara	Carolyn Lilly	Denise Russo	Greg Piatt	Joan Smith	Kim Richmeier	Marianne Daransky-Kanter	Nikhil S	S Egan	Terri Fisher
Amber Heard	Carolyn Rhazi	Deniz Bolbol	Greg Rosas	Joan Spooner	Kim Russo	Marianne Gadhia	Nikki Nafziger	S.J. McCarthy	Terri Gedo
Amelia Birchfield	Carolyn Vaughan	Dennis Adams	Greg Schwartz	Joan Taylor	Kim Waterson	Marianne Kai	Nina Berry	Sabrina Thompson	Terrie Smith
Amelia Jones	Carrie Johnson	Dennis Allen	Greg Sweel	Joan Velvick. Velvick	Kim Yirak	Marianne McKay	Nina Gallardo	Sabrina Wong	Terry Campbell
Amie Conklin-Rauch	Carrie Lindh	Dennis Bailey	Greg Winton	Joann Lapolla	Kimberly Bach	Marianne Slaughter	Nina MacDonald	Sally Crosby	Terry Poplawski
Amira Mansour	Carson Yu	Dennis Fritzinger	Gregg Oelker	Joanna Bonnheim	Kimberly Carona	Marianne Wilson	Nina Minsky	Sally Marone	Tessa Turner
Amy Beware	Carvel Chilcoat	Dennis Landi	Gregory Alper	Joanna Tang	Kimberly Tays	Marie Annette Burkart	Niparpon Johansen	Sally Wieland	Thalia Lubin
Amy Franz	Caryl Pearson	Dennis Love	Gregory Fite	Joanne Barnes	Kimberly Wright	Marie Bardin	Noah Haydon	Sallye Steiner Bowyer	Thea Cook
Amy Liebman	Caryn Graves	Dennis Ruby	Gregory Mull	Joanne Britton	Kira Durbin	Marie E. DiMassa	Noah Youngelson	Sam and Connie Marquez	Thefbiis-watching Izskaminyu
Amy Meyer	Casee Maxfield	Dennis Trembly	Gregory Perkins	JoAnne Ciazinski	Kiran Annavarapu	Marie Fannin-Laird	Nora Artine	Sam Butler	Theodore Bergmann
Amy Wolfberg	Cassandra Williams	Dennis Villavicencio	Gretchen Whisenand	Joanne Husar	Kirk Lumpkin	Marigrace Gleason	Nora Coyle	Sam Moore	Theresa Acerro
Amy Zink	Cassie A. Murphy	Derek Cavasian	Guillemette Epailly	Joanne McBirney	Kirsten Milaney	Marilee Potthoff	Nora Privitera	Sam Morrison	Theresa Beers
Ana Bozorgzad	Cassina Tarsia	Derek Knowles	Guy Nguyen	Joanne Sulkoske	Kirstie Palmer	Marilyn Bair	Nora Salet	Sam Naifeh	Theresa Bucher
Ana Herold	Catharine Cousins	Deric McGee	Gwen Stone	Joanne Tenney	Kit Long	Marilyn Barthelow	Norberto Chiodini	Samuel Popailo	Theresa Gonzalez

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Ana Williams	Catherine Beau-champ	Desiree Isaacs	Gwen Weil	Jodi Louderback	Kit Odoherty	Marilyn Carney	Noreen Weeden	Samuel Rosado	Theresa Kellgreen
Anastasia Yovanopoulos	Catherine Brown	Desiree Mitchell	H G	Jodi Rosenbloom	KK Seeberg	Marilyn DuHamel	Norm Wilmes	Sandi Covell	Theresa Rettinghouse
Andra Dillard	Catherine Carr	Diana Bohn	Hannah McSwiggen	Joe Bledsoe	Korinne Taylor	Marilyn Eng	Norma Campbell	Sandra Bannerman	Theresa Yandell
Andrea And Al	Catherine Dishion	Diana Chamberlain	Hannah Whitted	Joe Colton	Kortney Lillestrand	Marilyn Hall	Norma Wallace	Sandra Christopher	Therese DeBing
Andrea Callan	Catherine Haynes	Diana Jones	Harlan Lebo	Joe Glaston	Kozue Stankaitis	Marilyn Jasoni	NS Khalsa	Sandra Cutuli	Thomas Anderson
Andrea Dixon	Catherine Maloney	Diana Kliche	Harmon Huff	Joe Hernndez	Kris Boggis	Marilyn Jasper	O Lewis	Sandra Gamble	Thomas Burt
Andrea Edwards	Catherine Perman	Diana Lubin	Harold Mann	Joe Houde	Kris Cordova	Marilyn Levine	O'Grady Pam	Sandra Keist	Thomas Butler
Andrea Felsovanyi	Catherine Uchiyama	Diana Rodgers	Harold Tipping	Joe Salazar	Kris Gata	Marilyn Perona	Oja Fin	Sandra Lee	Thomas Campbell
Andrea Graff	Catherine Wolfe	Diana Saba	Harriet Miller	Joe Smith	Kris Nill-Snow	Marilyn Price	Olga Correa	Sandra McPherson	Thomas Cassidy
Andrea Kaufman	Cathie Sluski	Diana Soto	Harry Drandell	Joel Graves	Krista Dana	Marilyn Quindo	Ottavia Storer	Sandra Moore	Thomas Conroy
Andrea Lazar	Cathy Brooks	Diana Stokes	Harry Knapp	Joel Leong	Krista Sexton	Marilynn Russell	P Foley	Sandra Nealon	Thomas Deetz
Andrea Lewin	Cathy Crum	Diane Barbera	Harvey Sherback	Joel Masket	Kristen Lowry	Marina Martinez	Pablo Voitzuk	Sandra Olson	Thomas Edwards
Andrea Pino	Cathy Holden	Diane Brenum	Haydee David	Joel Robinson	Krister Olsson	Marinell Daniel	Pam Brigg McKown	Sandra Osumi	Thomas Filip
Andrea Salinas	Cathy Kermer	Diane Cantwell	Heath West	Johanna Abate	Kristian Kelly	Mario Cimino	Pam Decharo	Sandra Rasche	Thomas Goldenberg
Andrea Steloff	Cathy Kraus	Diane Cottrell	Heather Brophy	John Alexander	Kristin Baker	Mario Guzman	Pam Montroy	Sandra Skolnik	Thomas Irwin
Andreas Christensen	Cecilia Canales	Diane Demee-Benoit	Heather Guillen	John and Katrina Lee	Kristin Laughtin-Dunker	Mario Magpale	Pam Thomas-Hill	Sandra Younger	Thomas J Boo

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Andrew Connors	Cecilia Marzullo	Diane Dunhill	Heather Maynard	John Cameron	Kristin Unverferth	Marion Baer	Pam Wright	Sandra Zaninovich	Thomas Jones
Andrew Mittelman	Cecilia McGhee	Diane H	Heather McLarty	John Cant	Kristin Womack	Marisa Landsberg	Pamela Ball	Sandy Bach	Thomas Key
Andrew Mueckenberger	Chad Johnson	Diane Huffine	Heather Pham	John Crahan	Kristina Fukuda	Marissa Rutka	Pamela Bateman	Sandy Commons	Thomas Ray
Andrew Russell	Chad Kapusta	Diane Knipe	Heather Sabin	John Crowley	Kristina Wunder	Marit Anderson	Pamela Haddad	Sandy Williams	Thomas Tataranowicz
Andy Johnson	Chandrika Jayant	Diane Krell-Bates	Heather Whitehead	John Essman	Kristine Karnos	Marjorie Xavier	Pamela Hazen	Sandy Zelasko	Thomas Zachary
Andy Lupenko	Chantal Eivaz	Diane McLaughlin	Heidi Behnke	John Everett	KT Hale	Marjory Clyne	Pamela Libonati	Sandy Zwick	Tia Triplett
Andy Tomsky	Charesa Harper	Diann Rose	Heidi Dietz	John Feissel	Kurt Cruger	Marjory Keenan	Pamela Magathan	Sanja Dimitrijevic	Tiese Quinn
Angel Orona	Charlene Garcia	Dianna Sahhar	Heidi Jo Bean	John Ferrante	Kurt Gross	Mark Bailey	Pamela Magers	Sara Fogan	Tiffany Syltebo
Angela Clayton	Charlene Henley	Dianna Wallace	Heidi Lynn	John Gilchrist	Kyle Yaskin	Mark Crane	Pamela McDonald	Sara Katz	Tiku Das
Angela Limoni	Charlene Kerchevall	Dianne Croft	Heidi Miller	John Golding	Kyle Young	Mark Feldman	Pamela Nelson	Sara Lynn	Tim Barrington
Angelica Cruz	Charlene Woodcock	Dianne Morrison	Helen Cameron	John Gutman	L Boyd	Mark Giordani	Pamela Peck	Sara Morris	Tim Covey
Angelica Jochim	Charlene Zanella	Dianne Ostrow	Helen Garner	John Hoffman	L Jean Hurchalla	Mark Glasser	Pamela Sebastian	Sara Townsend	Tim Laidman
Angelica Lasley	Charles E Ray	Diedra Lackey	Helen Hearfield	John Ida	L M	Mark Golem-biewski	Pamela Stewart	Sara Van Dusen	Tim Lawnicki
Angie Grosland Jones	Charles Heinrichs	Diego Martinez	Helen Hobart	John Lindblad	L. Piquett	Mark Jorgensen	Pamela Zimmerman	Sarada Cleary	Tim Maurer
Anita Connors	Charles Lotstein	DJ DeWitt	Helen Lang	John Lucas	Laakea Laano	Mark Price	Parveen Chahal	Sarada Lewis	Tim Ryan
Anita Emery	Charles SMITH	Dominick Falzone	Helen Manning-Brown	John Moreau	Lacey Hicks	Mark Rhynsburger	Pat Cuiello	Sarah Diehl	Tim Viselli

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Anita Watkins	Charles Tribbey	Don Lipmanson	Helen Marie Scardina Plummer	John Nadolski	Lacey Levitt	Mark S. Weinberger	Pat Doherty	Sarah Frutig	Timothy Davis
Anita Wisch	Charlie Tetoni	Don Lukenbill	Helene Freedman	John Pasqua	Lana Touchstone	Mark Schulze	Pat Klaasen	Sarah Holder	Timothy Goodman
Anita Youabian	Charlotte Harbeson	Don Meehan	Helene Whitson	John Perrotta	L'Ann Bingham	Mark Stannard	Pat Peters	Sarah Kim	Timothy Johnston
Anjanette Caron	Charlotte Innes	Don Petersen	Helene Wright-Setterfield	John Randle	Lara Ingraham	Mark Swoiskin	Pat Thompson	Sarah Mack	Timothy Kinkead
Anje. van der. Naald	Charlotte Masarik	Dona van Bloemen	Henrietta Komras	John Robey	Lara Wright	Mark V Sheldon	Pat Toth-Smith	Sarah Northrip	Timothy Villalobos
Anjelina Matcham	Chase Martin	Donald Betts	Henry Kantrowitz	John Steponaitis	Laren Kessler	Mark Wentley	Pati Jio	Sarah ORourke	Tina Ann
Anju Coleman-Nakai	Chelsey M	Donald Hickman	Henry Martinez	John Stewart	Larry Bathgate	Mark Zier	Pati Tomsits	Sarah Peck	Tina Colafranceschi
Ann Dorsey	Cheri Johnson	Donald Sage Mackay	Henry Schlinger	John Teevan	Larry Emerson	Marla Flores-Jauregui	Patrice Ryan	Sarah Raskin	Tina Edmond
Ann Graves	Cherie Garrett	Donald Webb	Herbert Vogler III	John Telfer	Larry Ladd	Marla Hess	Patrice Wallace	Sarah Sismondo	Tina Landis
Ann Harvey	Cheryl Albert	Donna Anderson	Hilary Eisma	John Varga	Laura Baker	Marlene Testaguzza	Patricia Albers	Sarah Stiles	Tina Markowe
Ann Myers	Cheryl Elkins	Donna Bennett	Hilda Velasquez-Galvez	John Wagoner	Laura Bernstein	Marrisha Abbot	Patricia Barni	Sarah Suhich	Tina Peak
Ann Stratten	Cheryl Lewis	Donna Cetorelli	Hillary Ostrow	John Wait	Laura Bogni	Marsha Lyon	Patricia Blackwell-Marchant	Sarah Townsend	Tina Pirazzi
Ann Thryft	Cheryl Mendoza	Donna Cottrell	Hollie Borden	John Walton	Laura Brody	Marsha Penner	Patricia Blevins	Sarah V	Tina Wener
Ann Wasgatt	Cheryl Parkins	Donna Crane	Holly Dowling	John Weberski	Laura Chinn-Smoot	Marshal McKitrick	Patricia Bode	Sarah Wilkinson	Tisha Douthwaite

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Anna Drummond	Cheryl Thorn	Donna Gold	Holly Evans	Jon Anderholm	Laura Collins	Marta Plonski	Patricia Darfler	SauLing Yu	Tobias Fairman
Anna Kolovou	Chloe Strycker	Donna Grampp	Holly Hall	Jon Erickson	Laura Deibel	Marta Zelaya	Patricia Healy	Schani Nuripour	Todd Musto
Anna Narbutovskih	Chris Baillio	Donna Owens	Holly L	Jon Midgley	Laura Diffenbaugh	Martha Aubin	Patricia Hofrichter	Schuyler Kent	Tom Atha
Annalee Pineda	Chris Chung	Donna Russell	Holly Luban	Jonathan Chu	Laura Dutton	Martha Booz	Patricia Holbert	Scott Chapman	Tom Feldman
Anne Barker	Chris Leverich	Donna Sharee	Holly Peters	Jonathan Eden	Laura Hendon	Martha Calvinperez	Patricia J Flaherty	Scott Emsley	Tom Kunhardt
Anne Corrigan	Chris Mauriello	Donna Thomas	Holly Pumba	Jonathan Sampson	Laura Mani	Martha Carrington	Patricia Kolchins	Scott Ireland	Tom Pitman
Anne DeVenio	Chris Messick	Donna Warshaw	Holly Sletteland	Jonathan Scher	Laura Nardoza	Martha Goldin	Patricia Laurel-Lewis	Scott Jenkins	Tona Rose
Anne Dugaw	Chris Pincetich	Doreen Domb	Howard Cohen	Jonathon Schumacher	Laura O'Brien	Martha Martin	Patricia Lewis	Scott Jung	Toni Danielson
Anne Gregory	Chris Popp	Dorine Kramer	Howard Converse	Joni Mitchell	Laura Schaap	Martha Siegel	Patricia Locks	Scott Mason	Toni Russell
Anne Grenier	Chris Rose	Dorota Damato	Howard Higson	Jonica Brooks	Laura Schuman	Marti Jurick	Patricia LoVerme	Scott Mitchell	Toni Wolfson
Anne Henkes	Chris van Hook	Dorothea Morgenstern	Hristina Jankovic	Jordan Briskin	Laura Shifley	Martin Henderson	Patricia Marks	Scott Murray	Tracy Gilbert
Anne Kuzel	Chris Withrow	Dorothy J Bench	Hugh Bialecki	Jordan Paetsch	Laura Strom	Martin Horwitz	Patricia Marlatt	Scott Nelson	Tracy McLarnon
Anne P	Chrissy Cronin	Dorothy L Davies	Hunter Wallof	Jorge Belloso-Curiel	Laurel Brewer	Martin Marcus	Patricia Mickelsen	Scott Tipton	Tracy Shortle
Anne Spesick	Christa Neuber	Dorothy Pasquinelli	Ian Bixby	Jorge De Cecco	Laurel Brittany Hopper	Marty Bostic	Patricia Nickles	Sea Branca	Tracy Silverman
Anne Tuddenham	Christen Schilling	Dorothy Saxe	Ian Dogole	Jos Snchez	Laurel Cameron	Marvin Sperlin	Patricia Purdy	Sean Hagstrom	Travis Benneian

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Annemarie Girard	Christina Ciesla	Dorris Langston	Ian Silverstein	Jose Iturbe	Laurel Cline	Mary A Wade	Patricia Rudner	Sean Lagonegro	Tricia and John Wardlaw
Annemarie Hargadon	Christina Hodge	Doug Bender	Ianthe Zevos	Joselyn Wilkinson	Laurel Emsley	Mary Ann Cramer	Patricia Seffens	Sean McAdam	Trina Bodine
Annette Benton	Christina Jackson	Doug Flack	I-Ching Lao	Joseph Alba	Laurel Tucker	Mary Baker	Patricia Silver	Sean Monsarrat	Trina Warren
Annette Punimata	Christina Nielsen	Doug Thompson	Ida Foo	Joseph Alioto	Lauren Bouyea	Mary Belkin	Patricia Stevens	Seb Villani	Trish Gilbert
Anni Long	Christina Parker	Douglas Hammer	Iliana Lopez	Joseph Belli	Lauren Cohen	Mary Bernardini	Patricia Walker	Sejon Ding	Trish Tuley
Annie Belt	Christina Scaringe	Dr. Kathryn Marocchino	Ilya Turov	Joseph Blum	Lauren Coodley	Mary Brooks	Patrick Giovengo	Sepideh Molaie	Trudi Howell
Annie Lowe	Christine Berger	Dr. Tamara Rausch	Inga Frolova	Joseph Boone	Lauren Linda	Mary Budrunas	Patti Koger	Sergey Prokushkin	Trudy Jacobs
Annie Phillips	Christine Borje	Duncan McFarland	Ingrid Skei	Joseph Dadgari	Lauren Prust	Mary Dederer	Patti Mickelsen	Seth Laursen	Twila Roth
Annie Woodward	Christine Boschen	Dyan Osborne	Ira Kusuman-ingrum	Joseph Rinaldo	Lauren Schiffman	Mary Fryer	Pattie Meade	Seth Picker	Twyla Meyer
Annika Miller	Christine Hagelin	E. Rodriguez	Irene Cooke	Joseph Rodriguez	Lauren Wood	Mary Harte	Patty Linder	Shah Awi	Tyler Fitzgerald
Anthony Jammal	Christine Hayes	E. Wright	Irene Dunny	Joseph White	Laurie Alaimo	Mary Hicklin	Paul Babbini	Shalomar Loving	Tyson Martin
Anthony Tupasi	Christine Hoex	Earl Guy	Irene Roos	Joseph Woodard	Laurie Chambers	Mary Jo Rousseau	Paul Bechtel	Shan Albert	Umberto Gonzales
Antoinette Dusaid	Christine Hsia	Ebba Herriott	Isaac Salazar	Josephine Baldwin	Laurie Claudon-Clark	Mary Kate Stoever	Paul Belz	Shana Collett	Urania Hunter
Anton van Rooyen	Christine Mulholland	Ed Atkins	Isabella Amoroso	Joyce Bianchi	Laurie Fraker	Mary Lanis	Paul Bickmore	Shana Garcia	Urmila Padman-abhan
Antonia Chianis	Christine Ney	Ed Giguere	Ivana Cerovecki	Joyce Carlson	Laurie Hernandez	Mary Lou Meeks	Paul Brigham	Shannon Healey	Ursela Rabe

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Antonio Canepa	Christine Ranney	Edgar Koschmann	Ivor Phillips	Joyce Kolasa	Laurie Neill	Mary Lou Rosczyk	Paul Edelman	Shannon Hunter	Utkarsh Nath
Antonio Dettori	Christine Sepulveda	Edith Ogella	J Davis	Joyce Lavey	Laurie Rittenberg	Mary Maher	Paul Hunrichs	Shannon McNeil	V Morgan
April Hejka Ekins	Christine Sirias	Edward Beall	J Lasahn	Juan Villaseñor	Laurie Sargent	Mary McAuliffe	Paul Katz	Shannon Montoya	V R Sansone
April Lee	Christine Stewart	Edward Cavasian	J P	Jude Todd	Laurie Squier	Mary Novasic	Paul Lapidus	Shannon Patty	Val Barri
April Parkins	Christine Taylor	Edward Gowens	J Rubin	Judi Harris	Laurie Vallens	Mary Rojeski	Paul Ramos	Shannon Scott	Valeen Robertson
April Pinheiro	Christine Troche	Edward Kierklo	J S	Judith Bayer	LaVive Kiely	Mary Sanders	Paul Ripley	Shanti Zinzi	Valerie Carrick
April West	Christopher Evans	Edward Kuczynski	J Yudell	Judith Bushey	Lawrence Carbary	Mary Shabbott	Paul Tuff	Shara Hughes	Valerie Fannin
Ara Marderosian	Christopher Geukens	Edward Sullivan	Jack Coble	Judith D Radovsky	Lawrence Deng	Mary Shannon	Paul Ziegler	Sharlotte Woods	Valerie Goldberg
Arden Sweet	Christopher Hall	Edward Tischbern	Jack Rollens	Judith Edwards	LD Anderson	Mary Stanistreet	Paula Cavagnaro	Sharma Gaponoff	Valerie Jacobs
Arianna Siegel	Christopher Hamilton	Edwin Aiken	Jackie Bear	Judith Gottesman	Lea Boyle	Mary Steele	Paula DeFelice	Sharon Blume	Valerie Martin
Ariel Spilsbury	Christopher Kirkland	Edwyna Rennie	Jacob Brisco	Judith Hall	Lea Park	Mary Sue Ittner	Paula Giesing	Sharon Colyar	Valerie Nordeman
Arlene Baker	Christopher Lish	Eileen Blossman	Jacob Hatch	Judith Hoaglund	Leah Berman	Mary Wiener	Paula Glaser	Sharon Downs	Valerie Pelletier
Arlene Fullaway	Christopher Loo	Eileen Chieco	Jacob Huskey	Judith Kirk	Leah Redwood	Maryann Infield	Paula Goldberg	Sharon Essey	Valerie Santillanes
Armando A. Garcia	Christopher Rossi	Eileen Daniels	Jacob Quartuccio	Judith Looby	Leandro Velez	MaryAnn Bomarito	Paula Hollie	Sharon Hagen	Valerie Shideler
Armin Wright	Christopher Trinh	Eileen Donnelly	Jacoba Dolloff	Judith Marlin	Lee Alley	Maryann Choy	Paula Thompson	Sharon Handa	Valoree Hummel
Arnaud Dunoyer	Christopher Ware	Eileen Hunt	Jacqueline Broulard	Judith McClure	Lee Eames	Maryann Reece	Paula Willebrands	Sharon Hartman	Vanessa Quintero

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Arnel Catacutan	Cinda Johansen	Eileen Jennis-Sauppe	Jacqueline Carroll	Judith Perlin	Lee Jenkinson	Maryanne Degoede	Paulette Langguth	Sharon Hawkinsonmo	Varenka Lorenzi
Arnold Schildhaus	Cindi Bouvier	Eileen Karzen	Jacqueline Cochrane	Judith Smith	Lee Margot	Maryellen Redish	Paulette Ross	Sharon Hefke	Vasu Murti
Artineh Havan	Cindi Goldberg	Eileen Tonzi	Jacqueline Gait	Judith Villablanca	Leia Smith	Maryfrances Careccia	Paulette Schindele	Sharon Hollis	Veena Sud
Arturo Beyeler	Cindi Torres	El. Pe.	Jacqueline Haber	Judy Madigan	Leigh Castellon	Matt Kaplan	Pedro Rodriguez	Sharon Jerge	Venetia Large
Asano Fertig	Cindy Bear	Elaine Barrett	Jacqueline McVicar	Judy Schultz	Lena Bravo	Matt Michaelis	Peg Woodin	Sharon Kaplan	Venita Baldwin
Asher Perla	Cindy Koch	Elaine Benjamin	Jacqueline Meyer	Judy Shipley	Lena Fine	Matthew Gillespie	Peggie Kirkpatrick	Sharon Ketcherside	Verona Murray
Ashley Atkinson	Cindy MacDonald	Elaine Chung	Jacqueline Pomies	Judy Shively	Lena Nilsson	Matthew Heizman	Peggy Luna	Sharon Latta	Verona Rebow
Ashley Azuma	Cindy Stein	Elaine Cook	Jacqueline Waddill	Judy Trahan	Leo Ashton	Matthew Page	Peggy Rogers	Sharon Lieberman	Veronica Carrington
Ashley Foulk	Cipra Nemeth	Elaine Livesey-Fassel	Jacquelyn Roberts	Judy Williams	Leo Buckley	Matthew Priebe	Peggy Van Patten	Sharon Marquez	Veronica Romero
Audrey Higbee	Cj Peoples	Elaine Mont-Eton	Jacques Mauger	Julia Benson	Leon Van Steen	Matthew Reid	Penelope Prochazka	Sharon Morris	Vic Bostock
Audrey Quintero	Claire Bettington	Elaine Parker	Jaime Becker	Julia Bonfiglio	Lesley Erica Munn	Maura Sullivan	Penelope Strohl	Sharon Nicodemus	Vicki Gallegos
Autumn Marr	Claire Chambers	Elaine Woodriff	James Adams	Julia Rinaldi	Lesley Stansfield	Maureen Berndt	Penny Hartman	Sharon Paltin	Vicki Hughes
Ava Torre-Bueno	Claire Mathieson	Elba Estrada	James and Tamaira Patton	Julia Stewart	Lesley Terwilliger	Maureen McDonald	Penny luce	Sharon Ponsford	Vicki Kopinski
B Ed	Clare Shomer	Eleanor A High	James Ashcraft	Julia Thollaug	Leslie Castro-Woodhouse	Maureen Perron	Penny Scribner	Sharon Porter	Vickie Miller
B G	Clarissa Manges	Elena Ronquillo	James Dawson	Julia Thomas	Leslie Colyer	Maureen Toth	Percy Hicks-Severn	Sharon Rodrigues	Victor Carmichael

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B Sandow	Claude Duss	Elijah L.	James Feichtl	Julian Munoz	Leslie Davies	Maxine Litwak	Perry Gx	Sharon Rollins	Victor Ochoa
B. E.	Claude McDonald	Eliot Kaplan	James Grimm	Julian Orr	Leslie Gabbard	Maxine Zylberberg	Pete Dacy	Sharon Sadler	Victor Paglia
Barbara Bailey	Claude Rush	Elise Adibi	James Haig	Julianna Lazio	Leslie Klein	Megan Eding	Peter Hennessy	Sharon Sprouse	Victoria Fortin
Barbara Baldock	Claudia Bruckert	Elise Kost	James Harris	Julie Adelson	Leslie Kuhn	Megan Narasimhan	Peter Kuhn	Sharon Torrisi	Victoria Francis
Barbara Benjamin	Claudia Carr	Elissa B	James Hubbard	Julie Alicea	Leslie Smith	Megan Rathfon	Peter Lee	Sharyl Andreatta	Victoria Lea
Barbara Beno	Claudia Sawyer	Elissa Wagner	James Jordan	Julie Beer	Leslie Spoon	Megan Robbins	Peter Randolph	Shaun Farber	Victoria Loch
Barbara Bills	Claudia Stein	Elizabeth Adan	James Kawamura	Julie Binchet	Leslie Tate	Megan Snipes	Peter Reimer	Shawn Johnson	Victoria Reeder
Barbara Blau	Claudia Wornum	Elizabeth Bettenhausen	James Kerr	Julie Chalmers	Leslie Wood	Megan Wright	Peter Ring-Revotskie	Sheila Desmond	Victoria Vance
Barbara Chung	Clint Freeland	Elizabeth Colon	James Kimball	Julie Ford	Leticia Andreas	Mel Bearns	Peter Steinhart	Sheila Dixon	Victoria Wu
Barbara Cunningham	Cody Dolnick	Elizabeth Darovic	James Lansing	Julie Jones	Lezlie Ramsey	Mel Figueroa	Petra Boardman	Sheila Rollins	Vida Kenk
Barbara Danese	Colleen Auernig	Elizabeth Edinger	James Lynch	Julie Kanoff	Licia P.	Mel H	Phallon Davis	Sheila Sheppard	Vinay Kadambi
Barbara Dincau	Colleen Bergh	Elizabeth Guimarin	James Milner	Julie Miyasaki	Lidia Nasci	Mel Marcus	Philip Fraser	Sheila Sperber	Vira Confectioner
Barbara Eales	Colleen Cabot	Elizabeth Hasychak	James Monroe	Julie Osborn	Lilith Rogers	Melanie Melzar	Philip Patino	Shelby Hebert	Virginia Watson
Barbara Frances	Colleen English	Elizabeth Horvath	James Noordyk	Julie Sarah Peppard	Lily Bogard	Melanie Ross	Phoebe Lenhart	Shelley Billik	Vivian Hunt
Barbara Frazer	Colleen Hoff	Elizabeth Johnson	James Samis	Julie Smith	Lily Mejia	Melinda Gregory	Phoenix Giffen	Shelley Brown	Vivian Parker
Barbara Gallo	Colleen Kandus	Elizabeth Kloepfer	James Sherrel	Julie Stein	Lin Griffith	Melinda Taylor	Phyllis Chavez	Shelley Sterrett	W Wittl
Barbara Garrison	Colleen Lobel	Elizabeth Ladiana	James Tietz	Julien Jegou	Lin Heidt	Melissa Brooks	Phyllis Mottola	Shelley Wilson	Wade Tregaskis

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Barbara Greenwood	Colleen Rodger	Elizabeth Novak	James William Carr	Juliet Pearson	Linda Alvarado	Melissa Davis	Pietro G. Poggi	Shelley Zagars	Walter Erhorn
Barbara Harper	Colleena Brazen	Elizabeth Ramsey	James Woods	June Bernal	Linda Bell	Melissa Haddad	PK Lindauer	Shelly Howell	Walter Ma
Barbara Jacobsen	Connie Devine	Elizabeth Rue	James Yarbrough	June Cancell	Linda Detels	Melissa Hutchinson	Polly D Pitsker	Sheree Courtney	Waltraud Buckland
Barbara Leary	Connie Dowler	Elizabeth Taylor	Jamey Marth	Junko Nakai	Linda Doebel	Melissa Lippincott	Polly Garcia	Sheri Kuticka	Warren Digness
Barbara Lehman	Connie Lindgren	Elizabeth Wright	Jami Tolpin	Justin Chernow	Linda Ferreira	Melissa Miller	Pratiks HA Hasji	Sherman Lewis	Watson Gooch
Barbara Lincoln	Connie Loveland	Ellen Baer	Jamie Green	Justin Truong	Linda Freeman	Melissa Parham	Priscilla Klemic	Sherrell Cuneo	Wayne Gibb
Barbara Magliocca	Connie Wigen	Ellen Bartlett	Jamie Le	Justine Bellock	Linda Howie	Melissa Vasconcellos	Quaid Hasta	Sherri Venezia	Wayne Johnson
Barbara Marrs	Connie Wong	Ellen Chambell	Jamie Pratt	Jym Dyer	Linda Hunt	Melissa Villarreal	Querido Galdo	Sherrie Howell	Wayne Ryan
Barbara Mason	Constance Charles	Ellen Davis	Jamie S	K Burnham	Linda Johnson	Melissa Waters	R. Dene Larson Jr	Sherrill Futrell	Wayne Steffes
Barbara McIntyre	Constance Franklin	Ellen Emery	Jamie Sutcliffe	K Cassis	Linda Klann	Melissa Williams	R. Zierikzee	Sherron Kritzer	Wendy Berk
Barbara Mesney	Constantine Bogios	Ellen Hall	Jan Geren	K R	Linda Klein	Melodie Rammer	R.G. Tuomi	Sherry Ashbaugh	Wendy Pratt
Barbara Patton	Cora Baron	Ellen Koivisto	Jan Jones	Kae Yates	Linda Love	Melody Hamilton	Rachael Denny	Sherry Boren	Wendy Vandenbrock
Barbara Peters	Coralie Worcester	Ellen Levy	Jan Leath	Kalpana Pot	Linda Martin	Melony Paulson	Rachel Abdel	Sherry Burns	Wilfredo Rodriguez
Barbara Poland	Cordi Koga	Ellen Lewis	Jan Moughler	Kamakshi Hart	Linda McNamara	Melvyn Nefsky	Rachel Beck	Sherry LaMaison-Sclafani	William Crist
Barbara Root	Corey Barnes	Ellen Little	Jan Randall	Kara Ford-Martinez	Linda Ninomiya	Mercedes Benet	Rachel Grigelis	Sherry Macias	William Cuppoletti
Barbara Smith-Thomas	Corie Emery	Ellen McCann	Jan Ruby	Kara Pierce	Linda Pardy	Meredyth Young	Rachel Loui	Sheryl Harris	William Dane

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Barbara Tacker	Corinne Greenberg	Ellen Phillips	Jan Stark	Kare M	Linda Penrose	Merle and Spencer Smallwood	Rachel Lucio	Sheryl Lee	William G Rose Jr
Barbara Wasserman	Corinne Tomeo	Ellen Riegelhuth	Jana Niernberger Muhar	Karen and Edward Osgood	Linda Perkins	Merlin Wilson	Rachel Makool	Sheryl Marsh	William Harris
Barbara Whyman	Courtney Nichols Gould	Ellen Segal	Jana Perinchief	Karen Bean	Linda Petrulias	Merris Weber	Rachel Peterson	Shirley Harris	William Henzel
Barney McComas	Craig Hartline	Ellen Van Allen	Jane Bidinian	Karen Brant	Linda Rames	Merrylou Nelson	Rachel Shelton	Shoma Chatterjee	William Heuser
Barry Backer	Crispin Kitto	Elodie Patarias	Jane D Centers	Karen Colbourn	Linda Ramey	Mha Atma Khalsa	Rachel Wolf	Sid Shapiro	William Hudson
Barry Kogen	Cristian Alvarez	Eloise Hill	Jane Daniels	Karen Dorfman	Linda Redenbaugh	Mia Mantini	Rachele Mechem	Signe Swenson	William Laven
Beal Families	Cristina Amarillas	Elsa Knutson	Jane Forbes	Karen Emanuel	Linda Rudin	Michael A. Johnston	Rachelle D Gervais Vasquez	Signe Wetteland	William McGuire
Bearnard Bridges	Cristina Cordova	Emily Bryant	Jane Handel	Karen Good	Linda Savage	Michael Belli	Rachelle Miller	Silas Andrews	William Winburn
Beatriz Pallanes	Crystal Hernandez	Emily Damm	Jane Hernandez	Karen Hellwig	Linda Schmidt	Michael Bertrams	Rachelle Toti	Silvia De Salles	Wolf Q
Beatriz Whitman	Cybelle Sato	Emily Magnaghi	Jane Lyon	Karen Jacques	Linda Trevillian	Michael Biers	Rain Chan-Kalin	Silvia Rocha	Ye Shen
Ben Wiener	Cyndi Sood-Parker	Emily Morris	Jane McCullough	Karen LeBrun	Linda Walzer	Michael Bordenave	Ralph Bocchetti	Simone Boudriot	Yefim Maizel
Benita Cohen	Cynthia Denny	Emily Wheeler	Jane Mio	Karen Lull	Linda Weiner	Michael Braude	Ramona Davis	Simone Pugh	Yehudit Lieberman
Benjamin Billhardt	Cynthia Ferguson	Emmanuel Ramirez	Jane Moad	Karen McCaw	Linda Wilson	Michael Cavanaugh	Ramona Williams	Simone St Clare	Yesenia Fonseca
Benjamin Bingaman	Cynthia Fernandez	Enoe Corado	Jane Mueller	Karen Montana	Linda Wolfe	Michael Craib	Randee LaSalle	Singgih Tan	YogaDair Moremail

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Benjamin Fuchs	Cynthia Goodwin	Erfin Hartojo	Jane Nachazel-Ruck	Karen Neumeier	Linda Woodward	Michael Denton	Randy Gerlach	Smone Fonseca	Yolanda Danon
Benjamin Park	Cynthia Leeder	Eric Anches	Jane Neufeld	Karen Niles	Lindsay Bess	Michael Dielman	Randy Gray	Sofia Okolowicz	Yuki Floyd
Benjamin Schlau	Cynthia McHugh	Eric Bergman	Jane Orbuch	Karen O'Rourke	Lindsay Mugglestone	Michael Dorer	Randy Tudor	Solveig Erngren	Yurie Ansley
Benoit Clment	Cynthia Vexler	Eric Drake	Jane Spini	Karen Schortemeyer	Lindsey Hirway	Michael Eichenholtz	Raquel Cito	Sondra Boes	Yvonne Fisher
Berna Nitzberg	Cynthia Villegas	Eric Ericson	Jane Stallman	Karen Steele	Lindsey Kalfsbeek	Michael Essex	Raquel Narvios	Sonia King	Zoe Harris
Bernadette Meltzer	Cynthia Vinney	Eric Nichandros	Jane Sullivan	Karen Stephenson	Lindsey Loperena	Michael Evans	Rashid Patch	Sonia Valdivia	Zoltan Papp
Bernard Francine	Cynthia White	Eric Nylen	Jane Bielski	Karen Stewart	Lisa Ann Kelly and Family	Michael Frey	Ray Bartlett	Sonja Malmuth Malmuth	Zora Hocking
Bernard Hochendoner	Cyril Bouteille	Eric Smith	Janet Bindas	Karen Toyohara	Lisa Dadgar	Michael Friedman	Raymond Marshall	Soraya Barabi	Zsanine Alexander
Bernice Day	D B	Erica Fox	Janet Heinle	Karen Varney	Lisa Dice	Michael Garitty	Raymond Plasse	Sr. Barbara Jean Lee	
Beth Clary	D G	Erica Murray	Janet Heyman	Karen Warren	Lisa Frost	Michael Groeger	Rea Freedom	Stacey DeGooyer	
Beth Cochran	D M	Erica Ponce	Janet Howe	Karen Weston	Lisa Garvey	Michael Hazelton	Reanna Flores	Stacey Jones	
Beth Doshay	D R Spencer	Erica Stanojevic	Janet Klein	Karenina Schuller	Lisa Gherardi	Michael Henderson	Rebecca Anderson	Staci Peters	
Beth Goode	D. Fachko	Erika Agnew	Janet Laur	Karie P	Lisa Hammermeister	Michael Hundt	Rebecca Barker	Stacie Badgett	
Beth Herndobler	D. Rowe	Erika Lippoldt	Janet Lockwood	Karina Jahn	Lisa Henry	Michael Kavanaugh	Rebecca Helems	Stacie Charlebois	
Beth Richman	D.G. Sifuentes	Erika Martinez	Janet Maker	Karl Young	Lisa Howard	Michael Koterba	Rebecca Martin	Stacie Umetsu	

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Betty Kissilove	Dace Brown	Erika Shershun	Janet Matula	Karla Devine	Lisa Isley	Michael Kutilek	Rebecca Muradian	Stacy Kline	
Betty Mello	Dalaina Nowlin	Erin Barca	Janet McClain	Karla Henderson	Lisa Kohler	Michael Levitt	Rebecca Prewitt	Stacy Wilson	
Betty Winholtz	Dale Anania	Erin Garcia	Janet Naugle	Karla Morales	Lisa Mingear	Michael McMahan	Rebecca Swanson	Stan Fitzgerald	
Bev Spector	Dale Beaver	Erin Suyehara	Janet Penney	Karsten Mueller	Lisa Owens	Michael Neininger	Rebecca Vitale Mandich	Steffani LaZier	
Beverly Harris	Dale Drouin	Erin Yip	Janet Schwind	Karynn Merkel	Lisa Piner	Michael Price	Rebecca Wang	Stella Walton	
Beverly McCallister	Dale Haas	Erlinda Cortez	Janet Weil	Kassie Siegel	Lisa Rembold	Michael Rolbeck	Ree Whitford	Steph Hart	
Beverly Talbot	Dale Powell	Ernest Pacheco	Janet Wheeler	Kat Stephens	Lisa Rosenfield Podolsky	Michael Rotcher	Reed Fenton	Stephan Silen	
Bianca Molgora	Dalia Salgado	Ernie Walters	Janette Gamble	Katarina Grabowsky	Lisa Salazar	Michael Russell	Reed Metcalf	Stephanie Aston	
Bill Edwards	Damayanti Valle	Esther Boyd	Janice Boyd	Kate Brandt	Lisa Stanfill	Michael Ryan	Regina Stefaniak	Stephanie Clark	
Bill Guthrie	Damien De Castro	Esther Jenkins	Janice Brooks	Kate Stenberg	Lisa Toller	Michael Simpson	Rena Zaman-Zade	Stephanie Colet	
Bill Leikam	Dan Melius	Esther Zepeda	Janice E. Farry-Menke	Kate T	Lisa Wenzel	Michael Sullivan	Renaldo Gonzlez	Stephanie Corona	
Bill Lundeen	Dan Silver	Eva Bee	Janice Fagan	Katee James	Lisa Winningham	Michael Talbot	Rene Alvarez	Stephanie Farac	
Bill Wood	Dan Stone	Eva Grey	Janice Green	Katharine Greene-baum	Lisabette Brinkman	Michael Terry	Rene Hersey	Stephanie Gray	
Binh Tang	Dana Gatto	Eva Lydick	Janice Greenberg	Katharine Kehr	Lise Brooke	Michael Tomczyszyn	Rene Voss	Stephanie Jackel	
Blaise Brockman	Dana May	Eva Thomas	Janice Nakamura	Katharine Warner	Lise Kastigar	Michael Tullius	Renee Cossutta	Stephanie Laman	

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Blake Gerl	Dana Pratt	Evan Elias	Janice Rosse	Katharine Waugh	Lisel Scannell	Michael W Evans	Renee Darner	Stephanie Mood	
Blake Viola	Dana Thomart	Evan Greenspan	Janice Schenfisch	Katherine Aker	Lisette Garcia	Michael White	Renee Klein	Stephanie Proctor	
Blake Wu	Dana Wullen-waber	Evan Jane Kriss	Janice Tersigni	Katherine Andrews PhD	Lissa Coleman	Michele Banks	Renee Snyder	Stephanie Spiers	
Blue McRight	Danah Woodruff	Evan McDermit	Janine Comrack	Katherine Dillon	Liz Barillas	Michele Castano	Rev. Elisabeth Zenker	Stephanie Weber	
Bob Davis	Danelia Kracht	Evan Merz	Janine Giaime	Katherine Huish	Liz Ibarra	Michele Claussen	Rev. Maria Riter Wilson	Stephen Fitch	
Bob Greenawalt	Danett Abbott-Wicker	Everett A. Vieira III	Janine Weiche	Katherine Johnson	Liz Martin	Michele Halligan	Rhonda Norton	Stephen Hutchinson	
Bob Gunn	Daniel Christopher	Evette Andersen	Janis Dairiki	Katherine Morrison	Liz Sigel	Michele Hasle	Rhonda Oxley	Stephen Kent	
Bob McCleary	Daniel Costa	F S Grassia	Janis Hatlestad	Katherine Silvey	Lizzie Vierra	Michele May	Riccardo Nasci	Stephen Markel	
Bob Schildgen	Daniel Davis	F Slvester	Jann Johnson	Kathie Boley	LIII D	Michele Reynolds	Rich Moser	Stephen Muser	
Bob Tintle	Daniel Epperson	F. Carlene Reuscher	Jannie Lauenroth	Kathie Fierro	LIII Dddd	Michele Roma	Rich Panter	Stephen Rosenblum	
Bob Zdenek	Daniel Farr	F. R. Eguren	Janus Matthes	Kathie Jenni	Lois Bacon	Michele Simonsen	Richard Bejarano	Stephen Serafino M.S.	
Bobbie Zawkiewicz	Daniel Fleisch-man	Faith and Piers Strailey	Jared Goor	Kathie Kingett	Longwillow Fudemberg	Michelle Alexander	Richard Blain	Stephen Vicuna	
Bonnie Arbuckle	Daniel Goldberg	Favian Tong	Jared Leavitt	Kathleen Brown	Lonna Richmond	Michelle Allison	Richard Bold	Steve Berman	
Bonnie Burke	Daniel Liberthson	Faye Gregory	Jasha Stanberry	Kathleen Fernandez	Loraine Gonzalez	Michelle Babayan	Richard Cox	Steve Bianchi	
Bonnie Kohleriter	Daniel McKeighen	Faye Rye	Jason Brock	Kathleen Fox	Loralei Saylor	Michelle Barbour	Richard Gadler	Steve Dildarian	

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Bonnie MacRaith	Daniel Tiarks	Fayez Giheny	Jason Chinn	Kathleen Hall	Lorene Milligan	Michelle Dziamba	Richard Gallo	Steve Gross	
Bonnie Milrod	Daniel Walter	Felicia Bander	Jason Nakagawa	Kathleen Hynes	Lori Austin	Michelle Fletcher	Richard Heermance	Steve Kaye	
Bonnie Thompson	Daniella Brazelton	Felix Romero	Jason Nolasco	Kathleen Jacecko	Lori Bates	Michelle Fox	Richard Heller	Steve Lustgarden	
Bonnie W	Danielle Miele	Fiona Webb	Javier Del Valle	Kathleen Lavelle	Lori Conrad	Michelle Fryback	Richard Hubacek	Steve Sketo	
Bradley Colden	Danielle Roche	Flora Rosas	Jax Wilde	Kathleen McKeough	Lori Gilbert	Michelle Kemp	Richard Kornfeld	Steve Weiss	
Brady Clay	Danielle Thomas	Florence Alexander	Jay Rice	Kathleen Medina	Lori Jirak	Michelle MacKenzie	Richard Lee	Steve White	
Brandi Gomez	Danny Goodman	Florence Litton	Jaye Bergen	Kathleen Mugele	Lori Kegler	Michelle Mehlhorn	Richard Mercer	Steven Acosta	
Brandon Lowentrout	Danny Greene	Forest Frasier	Jayne Cerny	Kathleen Nolan	Lori Wolf	Michelle Mitchell	Richard Miller	Steven Aderhold	
Brandy Pearson	Daphne Lake	Forrest Lesak	Jayne Looper	Kathleen Petty	Lorlie Morey	Michelle Oroz	Richard Mohr	Steven Gigel	
Branstetter Kevin	Darius Fattahipour	Fra Fitz	Jayrill Nutt	Kathleen Powell	Lorna Groundwater	Michelle Palladine	Richard Moller	Steven Hoelke	
Breanne Cooney	Darlene Balzan	Frances Blythe	Jean Dimler	Kathleen Richards	Lorraine Jones	Michelle Parr	Richard Payne	Steven Nielsen	
Brenda Haig	Darrell Gauff	Frances Enriquez	Jean Hepner	Kathleen Sumida	Lorraine Lowry	Michelle Profant	Richard Richard	Steven Rosenberg	
Brenda Lee	Darren Frale	Frances Liau	Jean Lindgren	Kathleen Taft	Lorraine Wright	Michelle Quigley	Richard Robbins	Steviann Yanowitz	
Brendan Wilce	Darren Spurr	Frances McChesney	Jean Okamura	Kathleen Wilson	Lorri Freitas	Michelle Santy	Richard Shepard	Stewart Wilber	
Brent Spencer	Daryl Gale	Frances Oliver	Jean Tepperman	Kathleen Wong	Lou Insprucker	Michelle Seymoure	Richard Solomon	Stu Nichols	
Bret Polish	Darynne Jessler	Francesca Bolognini	Jean Woodrow	Kathlene Henry-Gorman	LouAnn Wolf	Michelle Sparks-Gillis	Richard Watson	Stuart Baumblatt	

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Brian Gray	Dave Beck	Francesca Rago	Jeanette King	Kathlyn Grabenstein	Louis Flores	Michelle van Asten	Richard Wightman	Su Libby	
Brian Halloran	Dave Dimond	Francesco Masiello	Jeanette Leinweber	Kathrine Fegette	Louis Heyn	Michelle Waters	Rick Edmondson	Sudi McCollum	
Brian Jeffery	Dave Grant	Frank and Mary Jane Anderson	Jeanette Monroe	Kathryn Boeddiker	Louis Spirito	Midori Nakayama	Rick Horne	Sue Knight	
Brian Rutkin	David and Jo Ann Williams	FRANK Burke	Jeanine Strobel	Kathryn Gibbons	Louise Dzimian	Miguel Oaks	Rick Posten	Sue Michelson	
Brian Still	David Bateman	Frank Eichenberg	Jeanne Hart	Kathryn Kawecki	Louise Eiler	Miguel Ramos	Rick Scott	Sue Smith	
Brianna Harrington	David Broadwater	Frank Richards	Jeanne Yu	Kathryn Kind	Louise Lieb	Mike Acosta	Rikke Naesborg	Sue Stack	
Brianna Knickerbocker	David Burtis	Frank Toriello	Jeannette Ralston	Kathryn Kirkhuff	Louise Rangel	Mike Camp	Riley Haythorn	SueAnn Schoon-maker	

Attachment B

Example Form Letter and Unique Form Letters

Example Form Letter

Info CaliforniaWDM

From: [REDACTED]
Sent: [REDACTED]
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,

[REDACTED]

Unique Form Letters

Info CaliforniaWDM

From: crockerbuckle@everyactioncustom.com on behalf of Nancy Arbuckle
<crockerbuckle@everyactioncustom.com>
Sent: Friday, March 15, 2024 2:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091) -- Don't KILL

Follow Up Flag: Follow up
Flag Status: Flagged

Dear APHIS-2020-0091 Wildlife Services,

The government KILLS coyotes? The Agriculture Department wipes out beavers? Tell me it's not true.

This killing must stop. Now.

Wildlife Services must adopt Alternative 2 or Alternative 3 in its environmental analysis. We know there are less harmful ways of ensuring people get their hamburgers. You could help ranchers install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Nobody wants their tax dollars going toward killing wildlife for the benefit of the livestock industry.

Killing wildlife destroys biodiversity.

The whole process is ugly and inhumane

Wildlife Services is supposed to work for all of us, not as an arm of the livestock industry. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Nancy Arbuckle
CA 94109-1719

Info CaliforniaWDM

From: annegomer4196@everyactioncustom.com on behalf of Anne Gomer <annegomer4196@everyactioncustom.com>
Sent: Thursday, March 14, 2024 8:42 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear APHIS-2020-0091 Wildlife Services,

Please Step-Up and PROTECT OUR WILDLIFE!! I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Anne Gomer
CA 94553-2712

Info CaliforniaWDM

From: daclesgens@everyactioncustom.com on behalf of Deborah Claesgens
<daclesgens@everyactioncustom.com>
Sent: Thursday, March 14, 2024 7:16 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear APHIS-2020-0091 Wildlife Services,

Come on! We can do this!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Deborah Claesgens
CA 95501-4167

Info CaliforniaWDM

From: plantwings@everyactioncustom.com on behalf of Christina Hodge
<plantwings@everyactioncustom.com>
Sent: Tuesday, March 12, 2024 7:34 AM
To: Info CaliforniaWDM
Subject: Please Help Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am a wildlife rehabilitationist and live in a remote area of CA. It is very hard to watch the planes come over killing the local predators! We need all creatures that were here originally not just those Humans think are desirable. We do not need to protect sheep ever! They hurt our public lands and degrade the plant life and damage wildlife habitat. They die too easily as well with even just dogs around. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Christina Hodge
CA 96110-0006

Info CaliforniaWDM

From: mar@everyactioncustom.com on behalf of mar milpa <mar@everyactioncustom.com>
Sent: Monday, March 11, 2024 10:53 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

Wolves are essential to the ecological balance. Stop Killing wild animals for Corporate Greed Meat Industry! Protect our public lands and animals NOW!

Sincerely,
mar milpa
CA 91502-1202

Info CaliforniaWDM

From: tanyartea@everyactioncustom.com on behalf of Tanya Thienngern
<tanyartea@everyactioncustom.com>
Sent: Sunday, March 10, 2024 9:09 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I desperately urge the Wildlife Services to adopt Alternative 2 or Alternative 3, in its environmental analysis, rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane! Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Tanya Thienngern
CA 92865-4021

Info CaliforniaWDM

From: Ideanne@everyactioncustom.com on behalf of Laura Bogni
<Ideanne@everyactioncustom.com>
Sent: Sunday, March 10, 2024 11:44 AM
To: Info CaliforniaWDM
Subject: Please take action to PROTECT California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Laura Bogni
CA 94510-2502

Info CaliforniaWDM

From: shanals@everyactioncustom.com on behalf of Shan Albert
<shanals@everyactioncustom.com>
Sent: Sunday, March 10, 2024 12:21 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

You are a fraud. You should have your salary paid by the livestock industry because that's who you work for. Or perhaps you work for the trappers and hunters but you sure as hell don't work for the people who want to protect wildlife. It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Shan Albert
CA 91604-1302

Info CaliforniaWDM

From: dlipman@everyactioncustom.com on behalf of Don Lipmanson
<dlipman@everyactioncustom.com>
Sent: Saturday, March 9, 2024 9:10 PM
To: Info CaliforniaWDM
Subject: End killing of California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As an attorney who recently filed CEQA lawsuits against three CA counties (Mendocino, Sierra and Plumas) to end their IWDM contracts with USDA-Wildlife Services, I applaud the agency for considering nonlethal alternatives to the trapping and killing coyotes, bears, beavers, badgers and raccoons at the behest of the relatively small number of CA ranchers and homeowners who lack the knowledge or wherewithal to use exclusionary or deterrent devices to minimize predation or property damage.

Wildlife Services has an ethical obligation to use best available science in its policymaking. science. The DEIR's in the aforementioned counties all provided scientific evidence that nonlethal measures are more effective than simply killing "problem wildlife," which in the case of coyotes leads to compensatory breeding and more predation. Please adopt Alternatives 2 or 3 of draft environmental analysis rather than continuing to kill wildlife that all play important roles in the local environment, especially killing of rats, gophers and other rodents.

Killing wildlife in an era when CDFW acknowledges that mountain lion and coyote populations are far smaller than available habitat would support indicates a biodiversity decline that Wildlife Services needs to counteract.

Additionally, many of the methods Wildlife Services now uses and proposes to continue are inhumane: Conibear traps, carbon dioxide executions, gassing entire families dens and burrows.

In Sierra and Plumas, county supervisors recognized that Wildlife Services' predator control might harm California's endangered wolf population. Wildlife Services must consult with USFWS to eliminate all risk of program-driven harm to the state's wolves, that still barely number 50 wolves. Alternative 2 or 3 are the environmentally and socially sound choices.

Sincerely,
Don Lipmanson
CA 95472-5015

Info CaliforniaWDM

From: Inilsson1@everyactioncustom.com on behalf of Lena Nilsson <Inilsson1@everyactioncustom.com>
Sent: Saturday, March 9, 2024 5:28 PM
To: Info CaliforniaWDM
Subject: California's wildlife should be protected (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Sincerely,
Lena Nilsson
CA 92651-2031

Info CaliforniaWDM

From: jaimeexplorer@everyactioncustom.com on behalf of Susan Wallace
<jaimeexplorer@everyactioncustom.com>
Sent: Saturday, March 9, 2024 3:23 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I love living in California. It is an incredibly diverse and beautiful state and still has areas where native species can live. That's why I am contacting you to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Susan Wallace
CA 95682-8930

Info CaliforniaWDM

From: paulbickmore@everyactioncustom.com on behalf of Paul Bickmore
<paulbickmore@everyactioncustom.com>
Sent: Saturday, March 9, 2024 12:57 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Adopt Alternative Two or Alternative Three in its environmental analysis rather than the proposed plan to continue killing wildlife. These choices would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, don't use our tax dollars to kill wildlife.

Look at how y'all's program could hurt our endangered wolf population. As the federal Endangered Species Act requires, consult with the Fish and Wildlife Service and commit to measures to prevent or mitigate harm to our vulnerable wolves. Don't rely on previous, outdated consultation from when we only had six wolves, all of whom were members of our sole wolf pack, the Lassen pack. We now have seven wolf packs and a total population of forty-five to fifty wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Stop working at the behest of the ranchers and feedlots and protect native wildlife. Adopt Alternative two or three.

Sincerely,
Paul Bickmore
CA 94618-1001

Info CaliforniaWDM

From: mntnb@everyactioncustom.com on behalf of Tami Mcnerney
<mntnb@everyactioncustom.com>
Sent: Friday, March 8, 2024 1:58 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Tami Mcnerney
CA 92024-2630

Info CaliforniaWDM

From: robraven60@everyactioncustom.com on behalf of Robert Raven <robraven60@everyactioncustom.com>
Sent: Thursday, March 7, 2024 10:13 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Protect CA Wildlife and Predators! Keep Nature Wild!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Robert Raven
CA 94503-1476

Info CaliforniaWDM

From: beaniethemeanie4@everyactioncustom.com on behalf of Karen Bean
<beaniethemeanie4@everyactioncustom.com>
Sent: Thursday, March 7, 2024 8:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

We CAN coexist, and we MUST to ensure healthy ecosystems. Wolves are apex predators that manage themselves and ecosystems better than humans can.

Sincerely,
Karen Bean
CA 95472-9765

Info CaliforniaWDM

From: bmacraith@everyactioncustom.com on behalf of Bonnie MacRaith
<bmacraith@everyactioncustom.com>
Sent: Thursday, March 7, 2024 3:15 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Such a terrible example for our young folks wanting someone to look up to and there they find people killing our Treasured Wildlife! You've got to re-think what you're doing!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bonnie MacRaith
CA 95521-5119

Info CaliforniaWDM

From: thevapormeister@everyactioncustom.com on behalf of chris messick
<thevapormeister@everyactioncustom.com>
Sent: Thursday, March 7, 2024 1:47 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Please help. We as human beings need to help other animals that we share this planet with!

It's time for Wildlife Services to stop working for only the best interests of the livestock industry and protect native wildlife!! I strongly support the adoption of Alternative 2 or 3.

Thank you, Chris M.

Sincerely,
chris messick
CA 92040-3050

Info CaliforniaWDM

From: nhaiston@everyactioncustom.com on behalf of Nancy Haiston
<nhaiston@everyactioncustom.com>
Sent: Thursday, March 7, 2024 12:34 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Apex predators are important to our Eco system. We need to stop killing them.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Nancy Haiston
CA 95436-9232

Info CaliforniaWDM

From: barbbeno@everyactioncustom.com on behalf of Barbara Beno
<barbbeno@everyactioncustom.com>
Sent: Thursday, March 7, 2024 9:59 AM
To: Info CaliforniaWDM
Subject: Restoring wildlife and biodiversity is important to me. We can share our environment with other species and we will benefit. California's wildlife is important to us all. Raised meat is important to only some of us. Re:APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Barbara Beno
CA 94547-2087

Info CaliforniaWDM

From: barb.eales@everyactioncustom.com on behalf of Barbara Eales
<barb.eales@everyactioncustom.com>
Sent: Thursday, March 7, 2024 9:23 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. It is COMPLETELY UNACCEPTABLE to use public funds for this type of industry support.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, as you ought to have already internalized and incorporated into your policies, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, and for basic decency, I don't want anyone's tax dollars being used to kill wildlife.

I also request Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's well past time for Wildlife Services to immediately stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Barbara Eales
CA 93036-7751

Info CaliforniaWDM

From: marjoryclyne@everyactioncustom.com on behalf of marjory Clyne
<marjoryclyne@everyactioncustom.com>
Sent: Thursday, March 7, 2024 8:32 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife. For too long you have supported whatever farmers want. Stand up for wildlife, they need your voice!

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
marjory Clyne
CA 92124

Info CaliforniaWDM

From: Stephanie.Laman@everyactioncustom.com on behalf of Stephanie Laman
<Stephanie.Laman@everyactioncustom.com>
Sent: Thursday, March 7, 2024 12:49 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank You

Sincerely,
Stephanie Laman
CA 92115-3341

Info CaliforniaWDM

From: anita1428@everyactioncustom.com on behalf of Anita Emery <anita1428@everyactioncustom.com>
Sent: Thursday, March 7, 2024 12:00 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I can't imagine what kind of person would shoot a wolf, her puppies or a beaver! These populations are endangered in our state, and deserve the right to life.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Anita Emery
CA 90016-5205

Info CaliforniaWDM

From: drginaday@everyactioncustom.com on behalf of Gina Day
<drginaday@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 10:02 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Apex predators like wolves play an important role in natural ecosystems. Wild species need to be allowed to live in our natural spaces. Wildlife should not be killed for the convenience of private livestock owners.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Gina Day
CA 94591-6643

Info CaliforniaWDM

From: royalouisa@everyactioncustom.com on behalf of Roya Arasteh
<royalouisa@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 7:42 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I understand the importance that ranchers place on their cattle and other livestock. It's not their livelihood and has a small profit margin and takes a lot of hard work! The fact that they are out there preserving open spaces is important for all of us.

Please consider alternatives that support ranchers and wildlife, too. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

As a long-time tax payer, I urge you to take action that benefits everyone and everything. A healthy eco-system and biodiversity will benefit everyone. We have the science to prove it!

Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. Studies have shown that reintroduction of apex predators benefits the entire ecological network: the reference for this is the study of "the Wolves of Yellowstone."

I strongly support the adoption of Alternative 2 or 3. Thank you for your time and attention.

Sincerely,
Roya Arasteh
CA 94702-2244

Info CaliforniaWDM

From: ginarina@everyactioncustom.com on behalf of Gina Ortiz
<ginarina@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 4:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)-Please put an end to this needless killing.

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Gina Ortiz
CA 91711-1644

Info CaliforniaWDM

From: charlene@everyactioncustom.com on behalf of Charlene Woodcock
<charlene@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 4:02 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wildlife diversity is essential to the future of life on our small planet. It is unacceptable for government officials to wipe out wild animals at the request of private citizens concerned for their private profits.

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Charlene Woodcock
CA 94709-1315

Info CaliforniaWDM

From: kyti1653@everyactioncustom.com on behalf of Sheri Kuticka <kyti1653@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 4:01 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. I don't want my tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I support the adoption of Alternative 2 or 3.

Sincerely,
Sheri Kuticka
CA 94518-3526

Info CaliforniaWDM

From: fuzzball799@everyactioncustom.com on behalf of Cheryl Mendoza <fuzzball799@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 3:58 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Thank you in advance for helping wildlife through compassionate and forward-thinking actions.

Sincerely,
Cheryl Mendoza
CA 94015-3702

Info CaliforniaWDM

From: ecocentric@everyactioncustom.com on behalf of Daryl Gale
<ecocentric@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 2:02 PM
To: Info CaliforniaWDM
Subject: Critical to protect our wildlife!

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Daryl Gale
CA 90024-0387

Info CaliforniaWDM

From: colleencabot@everyactioncustom.com on behalf of Colleen Cabot
<colleencabot@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 1:42 PM
To: Info CaliforniaWDM
Subject: WILDLIFE KILLING MUST STOP Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Colleen Cabot
CA 95132-1830

Info CaliforniaWDM

From: hslettel@everyactioncustom.com on behalf of Holly Sletteland
<hslettel@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 1:07 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

A change of course is long overdue. Please adopt Alternative 2 or Alternative 3 in your environmental analysis rather than continuing to kill our precious and beleaguered wildlife. These alternatives would encourage Wildlife Services to focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Holly Sletteland
CA 93465-5803

Info CaliforniaWDM

From: concharles@everyactioncustom.com on behalf of Constance Charles
<concharles@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 11:18 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Killing wildlife in order to protect farmers and ranchers should be off the table.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Constance Charles
CA 92071-4552

Info CaliforniaWDM

From: robynlovesducks@everyactioncustom.com on behalf of Robyn Johnson
<robynlovesducks@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 10:35 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am concerned about the future of wildlife . Our incursions into their habitat increase human and livestock interaction. It is imperative to attempt to keep balance in the ecosystem.I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Robyn Johnson
CA 96093-3098

Info CaliforniaWDM

From: pamela05n@everyactioncustom.com on behalf of Pamela Nelson
<pamela05n@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 10:24 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Extirpating our native predators has imbalanced our ecosystem. We are using dangerous methods to kill them that damage ourselves and our environment.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Pamela Nelson
CA 92086-9275

Info CaliforniaWDM

From: daybernice@everyactioncustom.com on behalf of Bernice Day
<daybernice@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 10:05 AM
To: Info CaliforniaWDM
Subject: Wildlife Services should be for protecting animals, not killing them or interfering with their ability to live as nature intended.

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bernice Day
CA 92804-5339

Info CaliforniaWDM

From: renehersey@everyactioncustom.com on behalf of Rene Hersey
<renehersey@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 9:33 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Hello Wildlife Services Decision Makers,

As a multi-generational Californian of CA Indian heritage-Achimen, I am begging Wildlife Services to “change when the facts change” and hurriedly adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. With the natural return of Wolves to our state and the growing dispersal of individual Wolves & Wolf families ranging farther and farther into a wider swath of habitat, the old system of using killing as the de facto approach will endanger the lives of these 7 families. There is now copious scientific evidence which bolsters non-lethal mitigation teaching and proven ways of providing support for farmers and livestock producers via fencing, inventive nighttime penning, lights and protecting young livestock inside secure indoor facilities which will afford them multiple approaches to protecting their investment and simultaneously keep our Wolves and other treasured wildlife safe from snares, traps and other horrific killing and maiming methods which Californians recoil from.

These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

As a docent for the Annenberg Wildlife Crossing I speak with the public on a regular basis & what matters to residents and visitors, one of the most common questions is “will this crossing keep cougars and other wildlife life safe to migrate and find more habitat to range”? I answer that, yes, that is the reason for these bridges & also enlarged culverts. I also tell them that we have a state endangered species act which protects our Wolves along with federal ESA protections so that Wolves have a lot of protections. Wildlife Services must do their part to discontinue lethal control & implement life affirming mitigation techniques, that's what the public wants.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I ask that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the

state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rene Hersey
CA 91602

Info CaliforniaWDM

From: kkarnos@everyactioncustom.com on behalf of Kristine Karnos
<kkarnos@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 9:16 AM
To: Info CaliforniaWDM
Subject: California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

California's wildlife is already reducing in diversity and numbers due to the pressures of habitat reduction and degradation, and impacts of a heating climate. We must find ways to more successfully coexist with wildlife. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kristine Karnos
CA 95124

Info CaliforniaWDM

From: summertimepam@everyactioncustom.com on behalf of Pamela Bateman
<summertimepam@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 8:14 AM
To: Info CaliforniaWDM
Subject: Wildlife-killing program must stop.Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please protect these wild animals. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Pamela Bateman
CA 95637-0157

Info CaliforniaWDM

From: cfjanuary9@everyactioncustom.com on behalf of Constance Franklin <cfjanuary9@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 7:25 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

IAs a taxpayer gravely concerned with thriving biodiversity, and the ethical regard toward other species, I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

As you know, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Constance Franklin
CA 90026-6197

Info CaliforniaWDM

From: palmcanyon@everyactioncustom.com on behalf of Joan Taylor
<palmcanyon@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 6:40 AM
To: Info CaliforniaWDM
Subject: Stop slaughtering predators (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Joan Taylor
CA 92264-1602

Info CaliforniaWDM

From: medicilorenzo@everyactioncustom.com on behalf of alice nguyen
<medicilorenzo@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 2:37 AM
To: Info CaliforniaWDM
Subject: APHIS-2020-0091: adopt alternative 2 or 3

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in its environmental analysis and stop killing wildlife with taxpayer money. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts. There are many effective, non-violent options, such as fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Wildlife Services must stop wasting public money on counterproductive, deadly measures that exacerbate the biodiversity crisis. Adopt of Alternative 2 or 3.

Sincerely,
alice nguyen
CA 95136

Info CaliforniaWDM

From: dan.gold1014@everyactioncustom.com on behalf of Daniel Goldberg <dan.gold1014@everyactioncustom.com>
Sent: Wednesday, March 6, 2024 12:00 AM
To: Info CaliforniaWDM
Subject: Wildlife Services Do Not Protect California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a biologist and animal lover, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Daniel Goldberg
CA 92506-4734

Info CaliforniaWDM

From: thomart@everyactioncustom.com on behalf of Dana Thomart
<thomart@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:40 PM
To: Info CaliforniaWDM
Subject: (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Why can't Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife? These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Fiscally, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry! I am really going to exchange this fact with fellow fiscally conservative citizens as myself.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I DO NOT want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Dana Thomart
CA 92008-2705

Info CaliforniaWDM

From: lweltner@everyactioncustom.com on behalf of Lucy Weltner
<lweltner@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:38 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am a nature educator writing to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis instead of the proposed plan, which involves continuing to kill animals like beavers and coyotes. There are many proven methods to effectively deter wildlife without killing them. Alternatives 2 and 3 will help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from cattle or sheep. As a wildlife advocate, I don't want my tax dollars to go towards killing animals unnecessarily.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lucy Weltner
CA 94702-1730

Info CaliforniaWDM

From: tavi.storer@everyactioncustom.com on behalf of Ottavia Storer
<tavi.storer@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:36 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I seriously urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ottavia Storer
CA 94601

Info CaliforniaWDM

From: ravensdream23@everyactioncustom.com on behalf of Steffani LaZier <ravensdream23@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:07 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Steffani LaZier
CA 95726-9424

Info CaliforniaWDM

From: dfilipelli@everyactioncustom.com on behalf of Deborah Filipelli
<dfilipelli@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:02 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

The following represents my position in support for Alternative 2 or Alternative 3 in your environmental analysis.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Deborah Filipelli
CA 95497-0341

Info CaliforniaWDM

From: jane_ikari@everyactioncustom.com on behalf of Bruce Coston
<jane_ikari@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 5:44 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091) and respect voter sovereignty

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Stop all the insanity . Implement minimum Income . And use CSSD. 2x Condorcet Cloneproof voting to meet UDHR. 21.3 .

Sincerely,
Bruce Coston
CA 94087-1749

Info CaliforniaWDM

From: agnewerika@everyactioncustom.com on behalf of Erika Agnew
<agnewerika@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 4:04 PM
To: Info CaliforniaWDM
Subject: Time to Protect & Prioritize California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Erika Agnew
CO 80205-2146

Info CaliforniaWDM

From: cebelesprit@everyactioncustom.com on behalf of Sea Branca
<cebelesprit@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 3:22 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to ADOPT Alternative 2 or Alternative 3 in its environmental analysis RATHER THAN the proposed plan to continue KILLING WILDLIFE! These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sea Branca
CA 95460-9523

Info CaliforniaWDM

From: simone@everyactioncustom.com on behalf of Simone St Clare
<simone@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 2:50 PM
To: Info CaliforniaWDM
Subject: STOP the Killing and Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Why is it a default to KILL?

There are other means to control wildlife that may be near livestock.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Simone St Clare
CA 94510-3108

Info CaliforniaWDM

From: lezlieramsey@everyactioncustom.com on behalf of Lezlie Ramsey
<lezlieramsey@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 2:18 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lezlie Ramsey
CA 94014-1555

Info CaliforniaWDM

From: jordan.briskin8@everyactioncustom.com on behalf of Jordan Briskin <jordan.briskin8@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 1:18 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It is imperative that Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Critically, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science, which concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Furthermore, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, tax dollars should not be used to kill wildlife.

It also behooves Wildlife Services to take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It cannot rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jordan Briskin
CA 94306-2512

Info CaliforniaWDM

From: allikat7@everyactioncustom.com on behalf of Allison Martin <allikat7@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:33 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Please stop killing wolves!

Sincerely,
Allison Martin
CA 95503-7409

Info CaliforniaWDM

From: Lucretia55@everyactioncustom.com on behalf of Lucy Gowrie <Lucretia55@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 11:41 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Also, keep in mind that meat ranching is probably the most polluting industry of our country and waterways. It definitely contributes to climate woes, as well. We've entered a time where meat ranching and eating should be discouraged. Our sense of entitlement over the lives of others is folly. We are the most destructive species of animal alive. If the population of peoples were wiped out in a bizarre pandemic, the planet, its resources and climate would thrive with minimal repercussions.

Please err on the side of saving our most iconic native and frequently endangered animals...

Sincerely,
Lucy Gowrie
NY 11766-1905

Info CaliforniaWDM

From: earle6@everyactioncustom.com on behalf of Ron Holman <earle6@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 11:25 AM
To: Info CaliforniaWDM
Subject: Protect California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Stop killing wildlife !!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on non-lethal methods for addressing conflicts with wildlife. As a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife it's essential that Wildlife Services act according to the best available science. That science concludes that non-lethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ron Holman
CA 95425-5402

Info CaliforniaWDM

From: slrponsford@everyactioncustom.com on behalf of Sharon Ponsford
<slrponsford@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 10:30 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. It is way past time that we stop placing a higher value on cattle than we do on our native wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Our wildlife brings so much value to our ecosystems that we must stop killing them and start using non-lethal methods so we can co-exist.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts. This has been proven time after time.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sharon Ponsford
CA 95409-6436

Info CaliforniaWDM

From: emilys.morris21@everyactioncustom.com on behalf of Emily Morris <emilys.morris21@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 10:28 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I echo others in urging Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. It is important to me to protect biodiversity to improve the health of our ecosystems.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Emily Morris
CA 94401-1969

Info CaliforniaWDM

From: Jennac@everyactioncustom.com on behalf of jennifer castner
<Jennac@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 10:03 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wolves are not the enemy. In fact, they are crucial to a healthy ecosystem.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
jennifer castner
CA 91977-3325

Info CaliforniaWDM

From: ghostshiip@everyactioncustom.com on behalf of Matthew Heizman
<ghostshiip@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:41 AM
To: Info CaliforniaWDM
Subject: Please help protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wildlife Services needs to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Matthew Heizman
CA 94503-1366

Info CaliforniaWDM

From: bkohlerite@everyactioncustom.com on behalf of Bonnie Kohleriter
<bkohlerite@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:25 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a science educator I have opposed Wildlife Services killing of wildlife, mainly carnivores which creates an imbalance in the ecosystem. I personally also oppose the cruel way of killing by the use of snares, trapping, shooting, and poisoning when I know there are other ways of managing the removal of wildlife. Further, I oppose the killing of wildlife at the behest of ranchers particularly public land ranchers when they have at their hands other ways of restraining wildlife from access to their livestock. Ranchers' mentality sees animals as for their own self-centered profit and pleasure, but the rest of us citizens see animals as co-existence with us and as parts of our souls. The rest of us should be listened to as we are asked to pay (taxes) for your services...yours we don't want.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bonnie Kohleriter
CA 94507-2829

Info CaliforniaWDM

From: stonedan6@everyactioncustom.com on behalf of Dan Stone <stonedan6@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:25 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on nonlethal methods proven to be effective for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are the most effective approach to achieve long-term results, and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also ask Wildlife Services to take a closer look at how its current program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and to instead focus on protecting native wildlife and advancing the public's interests. I strongly support the adoption of Alternative 2 or 3. Thank you.

Sincerely,
Dan Stone
CA 95608-4552

Info CaliforniaWDM

From: jcarpenn@everyactioncustom.com on behalf of Janet Penney
<jcarpenn@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:22 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please find a way to find an alternative to the killing wolves and coyotes that are often blamed for the killing of livestock. They are useful animals within the wildlife environment .

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janet Penney
CA 95608-6306

Info CaliforniaWDM

From: janet.weil13@everyactioncustom.com on behalf of Janet Weil <janet.weil13@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 8:22 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a concerned taxpayer and lover of California wildlife, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives will help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. I do not want my taxes used in this way!

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janet Weil
CA 92211-1577

Info CaliforniaWDM

From: tinaedmond@everyactioncustom.com on behalf of Tina Edmond
<tinaedmond@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 7:31 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. I very much support such an effort!

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife. Inhumane methods dehumanize us.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to STOP working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Tina Edmond
CA 94901-3823

Info CaliforniaWDM

From: debjurey@everyactioncustom.com on behalf of Debra Jurey
<debjurey@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 7:25 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please our wolf packs must be protected and preserved. California must show the rest of the country that we can coexist and that wolves will balance ecosystems to benefit the environment and other species. Our gray wolves are being slaughtered in anti wildlife states, we cannot let this destructive and cruel mindset ever take hold in California. Wildlife services must stop their lethal methods and turn to coexisting methods.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Debra Jurey
CA 93465-9308

Info CaliforniaWDM

From: patti@everyactioncustom.com on behalf of Patti Mickelsen
<patti@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 6:44 AM
To: Info CaliforniaWDM
Subject: YOU MUST Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I demand Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Your behavior has been unconscionable.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts. Clearly you are NOT doing your jobs. This is despicable.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife. Shame on you.

I also demand that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. How can you justify your past actions???

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. We don't need more animals to be slaughtered for meat...the wilderness is for our vanishing wild animals. DO YOUR JOBS!

Sincerely,
Patti Mickelsen
CA 92653-1451

Info CaliforniaWDM

From: ahernday@everyactioncustom.com on behalf of A. Hernday
<ahernday@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 5:59 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science.

That science concludes that nonlethal conflict-deterrence measures are most effective for ●●●. long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife ●●● impoverishes the rich biodiversity needed for healthy ecosystems.

And many of the methods Wildlife Services now uses (and proposes to keep using) are ●●● unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population.

As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves.

It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

●●●● It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife.

●●●● I strongly support the adoption of Alternative 2 or 3.

Sincerely,
A. Hernday
CA 95409

Info CaliforniaWDM

From: klarrcaroline@everyactioncustom.com on behalf of Caroline Klarr
<klarrcaroline@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 5:32 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wildlife is under constant attack with climate change and habitat loss, now idiots want to kill them all for pride and paranoia. These animals cannot read road maps and are trying to disperse from conditions that cannot support them. Wildlife corridors are key to the survival of many species who provide key foundational roles in the ecosystem. Research has found that wolves regulate diseases in ungulates, promote the recovery of beavers and beavers help regulate water tables. Wolves, like people, have independent personalities. Predators that are problematic need to be treated on an individual basis instead of lumping or labeling the entire species into one box. The small view is to keep thinking about the threat these predators create to ranchers but ranchers need water. Climate change is expensive and water is scarce during fire season. Hunters likewise want healthy animals breeding. If people would educate themselves, they would understand that wolves help with these problems. These animals are part of the natural resources that balance our environment to preserve it for generations. These resources belong to everyone and no one state should be allowed to make decisions that impact another, rather states need to work together to protect these species. If states cannot do this based on common sense and the spirit of the Union, then that's what the Feds are for... to do the right thing for everyone including our children who have the right to live in a land of prosperity and biodiversity.

Therefore, I urge Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Caroline Klarr
CA 95503-7137

Info CaliforniaWDM

From: felsovanyi@everyactioncustom.com on behalf of Andrea Felsovanyi
<felsovanyi@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 5:17 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am sorry to write this, but It boggles the mind that your "wildlife services" remain barbaric, unnecessary and in thrall to special interests that are not serving wildlife, rather are antithetical to wildlife health and preservation for private gain. I am disturbed that your agency is subsidizing, in my name as a tax paying American citizen, the personal private interests of a very few (though powerful) interest groups.

We all benefit from you fulfilling your duties in a manner consistent with the original charge you were given - that has become skewed and misdirected now to the benefit of a few while wildlife itself pays a horrific price to your indiscriminate slaughter.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Andrea Felsovanyi
CA 94025-6317

Info CaliforniaWDM

From: morningdove9@everyactioncustom.com on behalf of Nan Singh-Bowman
<morningdove9@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 4:32 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Wolves are part of a healthy ecosystem.

Sincerely,
Nan Singh-Bowman
CA 95005-9213

Info CaliforniaWDM

From: kathrynwildphd@everyactioncustom.com on behalf of Kathryn Wild
<kathrynwildphd@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 3:33 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Shooting, trapping, poisoning native wildlife seems so out-of-date in the 21st century. Wildlife Services should stop supporting the livestock industry and protect native wildlife. There are options and I strongly support the adoption of Alternative 2 or 3.

Respectfully

Sincerely,
Kathryn Wild
CA 92126-2076

Info CaliforniaWDM

From: jvh47@everyactioncustom.com on behalf of James Hubbard <jvh47@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 3:04 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Wildlife Services must act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts. Furthermore, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems.

Wildlife Services should also take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Wildlife Services should stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you.

Sincerely,
James Hubbard
CA 90043-4840

Info CaliforniaWDM

From: webb.fiona@everyactioncustom.com on behalf of Fiona Webb
<webb.fiona@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:19 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Fiona Webb
CA 93940-2514

Info CaliforniaWDM

From: keciatalbot@everyactioncustom.com on behalf of Kecia Talbot
<keciatalbot@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:12 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

I'm vegan, and I can tell you that livestock have overrun this state to the detriment of wildlife and biodiversity, not to mention of human health and a healthy planet. (Beef production is a leading cause of climate change as well as cancer and heart disease.)

Did you know that wildlife comprises only 5.5 percent of total biomass on Earth? People and their cattle have overrun the world and account for most of its biomass. I would leave the wild critters alone and let them live. They're not that big of a threat! Don't blow this out of proportion.

Stop answering to the whims of the livestock industry. Cattle and ranching cause global warming, and eating cattle has many health consequences.

Non-lethal alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife -- highly unethical and inhumane -- for the benefit of the livestock industry.

And don't forget our fragile wolf population. They're protected, so don't mess with their ecosystems.

And you should definitely not kill beavers. We wouldn't have such fierce wildfires if beavers had been allowed to do their work damming streams and increasing water retention in woodland areas.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations

in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to STOP WORKING AT THE BEHEST OF THE LIVESTOCK INDUSTRY AND INSTEAD PROTECT NATIVE WILDLIFE. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kecia Talbot
CA 94957-1501

Info CaliforniaWDM

From: samesamejane@everyactioncustom.com on behalf of Evan Jane Kriss
<samesamejane@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:11 AM
To: Info CaliforniaWDM
Subject: PROTECT California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective NONLETHAL methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, NO TAX DOLLARS would go toward killing wildlife for the benefit of the livestock industry. THIS MUST STOP NOW.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are UNETHICAL AND INHUMANE. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. THIS MUST STOP NOW. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services MUST consult with the U.S. Fish and Wildlife Service and commit to measures to PREVENT OR MITIGATE HARM to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to STOP WORKING AT THE BEHEST OF THE LIVESTOCK INDUSTRY and PROTECT NATIVE WILDLIFE. I STRONGLY SUPPORT the adoption of Alternative 2 or 3.

Sincerely,
Evan Jane Kriss
CA 94965-2066

Info CaliforniaWDM

From: watanita@everyactioncustom.com on behalf of Anita Watkins
<watanita@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:01 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. PLEASE help save their lives!

Sincerely,
Anita Watkins
CA 94611-2404

Info CaliforniaWDM

From: kewlworms@everyactioncustom.com on behalf of Karen Good
<kewlworms@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:01 AM
To: Info CaliforniaWDM
Subject: We all care about California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please do not kill wildlife. There are other effective ways to protect cows and sheep. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Karen Good
CA 94549-2129

Info CaliforniaWDM

From: cacaogal@everyactioncustom.com on behalf of Betty Kissilove
<cacaogal@everyactioncustom.com>
Sent: Tuesday, March 5, 2024 12:01 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Betty Kissilove
CA 94122-3644

Info CaliforniaWDM

From: stormdragon71@everyactioncustom.com on behalf of Rachael Denny <stormdragon71@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:53 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I respectfully urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures can be very effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems.

Wildlife Services should take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to take steps to support the protection of our native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your time and consideration.

Sincerely,
Rachael Denny
CA 93426-9624

Info CaliforniaWDM

From: bklvr50@everyactioncustom.com on behalf of Patricia Nickles <bklvr50@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:24 PM
To: Info CaliforniaWDM
Subject: Please Protect California's Wildlife, (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack.

California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Patricia Nickles
CA 90245-3006

Info CaliforniaWDM

From: dereklindenknowles@everyactioncustom.com on behalf of Derek Knowles
<dereklindenknowles@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:19 PM
To: Info CaliforniaWDM
Subject: Please protect wildlife

Dear APHIS-2020-0091 Wildlife Services,

Healthy wildlife is what makes our country great and beautiful. It's dismaying to learn the extent to which Wildlife Services acts not as a steward of our wondrous creatures, but as a brutal enforcer.

There are alternatives to indiscriminately exterminating these animals and I would urge Wildlife Services to adopt Alternative 2 or 3 in its environmental analysis.

We are increasingly becoming aware that we depend on animals like coyotes, beavers, and mountain lions to create balance in our ecosystems. Killing, rather than honoring, those contributions is the last thing I want my tax dollars going towards.

So I am writing in the strongest possible terms to voice my support for an adoption of Alternative 2 or 3 of your analysis and for a larger shift in the way in which American wildlife is treated.

Sincerely,
Derek Knowles
CA 95476-7687

Info CaliforniaWDM

From: blee020@everyactioncustom.com on behalf of Brenda Lee <blee020@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:07 PM
To: Info CaliforniaWDM
Subject: PLEASE Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Brenda Lee
CA 90712-3911

Info CaliforniaWDM

From: r-j_mcclure@everyactioncustom.com on behalf of Judith McClure <r-j_mcclure@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:03 PM
To: Info CaliforniaWDM
Subject: Stop the Killing! Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Judith McClure
CA 91387-1841

Info CaliforniaWDM

From: buchert@everyactioncustom.com on behalf of Theresa Bucher
<buchert@everyactioncustom.com>
Sent: Monday, March 4, 2024 10:00 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts. Take appropriate actions now and stop killing wildlife.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Theresa Bucher
CA 91356-3220

Info CaliforniaWDM

From: liaisonsus@everyactioncustom.com on behalf of Rosemary Graham-Gardner
<liaisonsus@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rosemary Graham-Gardner
CA 90266-1336

Info CaliforniaWDM

From: rkvaas@everyactioncustom.com on behalf of Robert Kvaas
<rkvaas@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:22 PM
To: Info CaliforniaWDM
Subject: Please Protect California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Robert Kvaas
CA 93117-1623

Info CaliforniaWDM

From: Paulette@everyactioncustom.com on behalf of Paulette Schindele
<Paulette@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:18 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please protect our predators. They are vital to the health of our ecosystems. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Paulette Schindele
CA 92069-7501

Info CaliforniaWDM

From: earthactionnetwork@everyactioncustom.com on behalf of Mha Atma Khalsa
<earthactionnetwork@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:18 PM
To: Info CaliforniaWDM
Subject: PLEASE! Protect California's wildlife (APHIS-2020-0091)!

Dear APHIS-2020-0091 Wildlife Services,

As a concerned American citizen and taxpayer and California resident, I very strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mha Atma Khalsa
CA 90035-3314

Info CaliforniaWDM

From: mhillperron@everyactioncustom.com on behalf of Maureen Perron
<mhillperron@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:11 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Action addressing killing wildlife must be taken.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Maureen Perron
CA 94019-2283

Info CaliforniaWDM

From: brookesouthall@everyactioncustom.com on behalf of brooke southall
<brookesouthall@everyactioncustom.com>
Sent: Monday, March 4, 2024 9:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

PLEASE I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
brooke southall
CA 94965-3128

Info CaliforniaWDM

From: gtwharton@everyactioncustom.com on behalf of Gerold Wharton
<gtwharton@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Gerold Wharton
CA 92056-3243

Info CaliforniaWDM

From: rdaniel45@everyactioncustom.com on behalf of Richard Richard <rdaniel45@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:54 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am writing to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis and NOT the plan which encourages the continued slaughtering wildlife.

Instead, the aptly mis-named Wildlife Services, must use proven and effective nonlethal methods for limiting or eliminating wildlife conflicts with livestock. This might include fencing, lights or trained dogs to deter predators from approaching livestock.

Conflicts between wildlife and livestock must be managed according to the best available science. Killing predators and other wildlife to safeguard cattle or sheep will not solve the problem. More can be accomplished using non lethal methods.

Killing of wildlife, especially predators, negatively impacts ecosystem health. Unethical and inhumane tactics for killing wildlife must cease! These heartless methods include body-gripping traps, neck snares, den fumigants and aerial hunting. I resent my tax dollars being used to support such activities to protect the livestock industry which pays dirt cheap prices for the privilege of using (or abusing?) our public lands It's time for Wildlife Services to stop serving at the beck and call of the livestock industry and protect native wildlife instead. I strongly support Alternatives 2 or 3.

Sincerely,
Richard Richard
CA 91789

Info CaliforniaWDM

From: bobbird4@everyactioncustom.com on behalf of Bob Tintle <bobbird4@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:36 PM
To: Info CaliforniaWDM
Subject: Please Excute Your Mandate to Protect California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bob Tintle
CA 93923

Info CaliforniaWDM

From: susan1@everyactioncustom.com on behalf of susan pelican <susan1@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:32 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.thank you.

Sincerely,
susan pelican
CA 95695-9315

Info CaliforniaWDM

From: ravensdream23@everyactioncustom.com on behalf of Steffani LaZier <ravensdream23@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:13 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Steffani LaZier
CA 95726-9424

Info CaliforniaWDM

From: mlevitt4@everyactioncustom.com on behalf of Michael Levitt <mlevitt4@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:12 PM
To: Info CaliforniaWDM
Subject: Protect - Don't Kill California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I feel very strongly that the Wildlife Services needs to adopt Alternative 2 or Alternative 3 in its environmental analysis instead of the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Please Stop working for the livestock industry!

I implore you to protect our native wildlife by supporting the adoption of Alternative 2 or 3.

Thank you.

Sincerely,
Michael Levitt
CA 94547-3607

Info CaliforniaWDM

From: atkinson.ashley@everyactioncustom.com on behalf of Ashley Atkinson
<atkinson.ashley@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:08 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I'm a Californian for whom protecting our ecosystems and biodiversity is the top priority, and I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ashley Atkinson
CA 90042-4504

Info CaliforniaWDM

From: claude@everyactioncustom.com on behalf of Claude Rush
<claude@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:07 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I DON'T UNDERSTAND WHY YOU ARE ALWAYS ON THE SIDE OF THE BAD GUYS! You don't care about wildlife, you just care about pleasing corporations or hunters. SHAME ON YOU! I am sorry I cannot supervise where my tax dollars go, because Wildlife Services would be collecting unemployment.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Claude Rush
CA 90077-3309

Info CaliforniaWDM

From: 4benedictions@everyactioncustom.com on behalf of Katherine Andrews PhD
<4benedictions@everyactioncustom.com>
Sent: Monday, March 4, 2024 8:04 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Thank you!

Sincerely,
Katherine Andrews PhD
CA 95219-4625

Info CaliforniaWDM

From: torgersgk@everyactioncustom.com on behalf of Grayson Torgersen
<torgersgk@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:42 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thanking you in advance to consider the Alternative approaches above and save Wild Life.

Sincerely,
Grayson Torgersen
CA 91101-5603

Info CaliforniaWDM

From: rutheott@everyactioncustom.com on behalf of Sandra Rasche
<rutheott@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:41 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also urgently request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sandra Rasche
CA 95552-9337

Info CaliforniaWDM

From: eileendaniels@everyactioncustom.com on behalf of eileen daniels
<eileendaniels@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:35 PM
To: Info CaliforniaWDM
Subject: Adopt Alternative 2 or Alternative 3

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
eileen daniels
CA 91387-5004

Info CaliforniaWDM

From: mrosczyk@everyactioncustom.com on behalf of Mary Lou Rosczyk
<mrosczyk@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:32 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

When are livestock ranchers going to become responsible partners in caring for their animals? That is an essential part of good animal husbandry? I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mary Lou Rosczyk
CA 92562-5295

Info CaliforniaWDM

From: jmasket44@everyactioncustom.com on behalf of Joel Masket <jmasket44@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:29 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Imagine being a mother wolf and seeing your pups shot with a high-powered rifle or being a young, terrified wolf pup witnessing your mother choking to death in a neck snare.

I am asking, begging Wildlife Services to stop the sanctioned slaughter of gray wolves and other carnivores using the most barbaric means available (e.g. cyanide poisoning, hunting at night using night vision goggles and helicopters, baiting, trapping and neck snaring, killing pups, unlimited hunting tags).. These new extermination laws passed in Idaho, Montana and other nearby states have been written by ranchers (e.g Idaho state senator mark harris) claiming falsely that wolves have killed significant number of livestock. The % of livestock killed by wolves is a tiny fraction of a percentage point and the federal govt. compensates ranchers for their lost livestock due to wolves.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Joel Masket
CA 91362-4685

Info CaliforniaWDM

From: aprilillustrator@everyactioncustom.com on behalf of April Lee
<aprilillustrator@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wildlife Services please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
April Lee
CA 92612

Info CaliforniaWDM

From: irene.cooke@everyactioncustom.com on behalf of Irene Cooke
<irene.cooke@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:25 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am horrified that the US Wildlife Service spends my tax dollars killing wildlife simply to increase profits for livestock producers. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Irene Cooke
CA 93117-6266

Info CaliforniaWDM

From: thacerro@everyactioncustom.com on behalf of Theresa Acerro
<thacerro@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:24 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

You are supposed to be protecting wildlife not killing them. Let livestock owners protect their own animals. they should not kill wildlife either. Electric fencing, secure housing whatever is necessary is their responsibility. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Theresa Acerro
CA 91911-5301

Info CaliforniaWDM

From: peggykitts@everyactioncustom.com on behalf of Margaret Kitts
<peggykitts@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:21 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

I urge you use the best available current science which concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Furthermore, killing wildlife impoverishes the rich biodiversity needed to develop healthy ecosystems. Actually many of the methods Wildlife Services now uses (and proposes to continue using) are unethical and inhumane. The cruel gear they currently use are body-gripping traps and neck snares, releasing fumigants into dens and burrows, and aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I would prefer we not use tax money to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It cannot rely on outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Wildlife Services must stop working at the behest of the livestock industry and actually protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Margaret Kitts
CA 92630-1722

Info CaliforniaWDM

From: kellykramer@everyactioncustom.com on behalf of Kelly Kramer
<kellykramer@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:16 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I demand Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kelly Kramer
CA 92840-1716

Info CaliforniaWDM

From: shomac@everyactioncustom.com on behalf of Shoma Chatterjee
<shomac@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:15 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Make ranchers use nonlethal deterrents and stay far from wolf dens.

Sincerely,
Shoma Chatterjee
CA 94115

Info CaliforniaWDM

From: samjbutler@everyactioncustom.com on behalf of Sam Butler
<samjbutler@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:09 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am writing to ask Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

It is long overdue for Wild Services to start focusing on implementing non-lethal methods as a first option when dealing with wildlife conflict. For too long, the first impulse has been for Wildlife Services to kill native wildlife, to the detriment of eco-systems and the animals involved. This now must change.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sam Butler
CA 90045-2753

Info CaliforniaWDM

From: richshup@everyactioncustom.com on behalf of Frank Richards
<richshup@everyactioncustom.com>
Sent: Monday, March 4, 2024 7:07 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I or we urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I or we don't want anyone's tax dollars being used to kill wildlife.

I or we also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I or we strongly support the adoption of Alternative 2 or 3.

Thank you.

Gratefully, on behalf of my own relatives as well as on behalf of all future generations on our own small planet Earth,

Frank

Sincerely,
Frank Richards
CA 92373-5515

Info CaliforniaWDM

From: Carmie807@everyactioncustom.com on behalf of Carmen Rodriguez <Carmie807@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:50 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example;

helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science.

That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane.

Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population.

As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves,;

all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Please reconsider the previous plan that does not help wildlife in the least and there are and can be bridges with people who are ranchers. Thank you again.

Sincerely,
Carmen Rodriguez
CA 94587-3938

Info CaliforniaWDM

From: pjholbert@everyactioncustom.com on behalf of Patricia Holbert
<pjholbert@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:48 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Patricia Holbert
CA 95073-9528

Info CaliforniaWDM

From: mariazirka@everyactioncustom.com on behalf of Maria Mc Cutchan
<mariazirka@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:43 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. on public land native wildlife should always have priority over private profit

Sincerely,
Maria Mc Cutchan
CA 92037-1601

Info CaliforniaWDM

From: mintjulip1@everyactioncustom.com on behalf of julie sarah peppard <mintjulip1@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

The time for managing problems by KILLING is past. See, e.g., Israel and Gaza. Please use greater intelligence and imagination, and find solutions to this problem which both help the ranchers AND the other animals who are entitled to their lives same as you and me.

Sincerely,
julie sarah peppard
CA 90291-3523

Info CaliforniaWDM

From: janasg@everyactioncustom.com on behalf of Jana Perinchief
<janasg@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:26 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jana Perinchief
CA 95821-3402

Info CaliforniaWDM

From: SantaCruzCelticUnicorn@everyactioncustom.com on behalf of SEAN MCADAM
<SantaCruzCelticUnicorn@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:19 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you.

Sincerely,
SEAN MCADAM
CA 95062-2559

Info CaliforniaWDM

From: eahigh2@everyactioncustom.com on behalf of Eleanor A High <eahigh2@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Civilized sane people PROTECT animals. Deranged monsters exploit, abuse, torture and kill them. Our tax money to Wildlife Services expects to have our wonderful wildlife protected. Get ride of the monsters not the animals.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Eleanor A High
CA 93003-6327

Info CaliforniaWDM

From: jacpalmer@everyactioncustom.com on behalf of Jacques Mauger
<jacpalmer@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:09 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please leave wildlife alone. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jacques Mauger
CA 92037-2302

Info CaliforniaWDM

From: 312annh@everyactioncustom.com on behalf of Ann Harvey
<312annh@everyactioncustom.com>
Sent: Monday, March 4, 2024 6:01 PM
To: Info CaliforniaWDM
Subject: Protect wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in the Wildlife Services environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

In addition, I believe we need to step back and reevaluate the overall impacts of the program. For example, killing beavers. Our water scarcity challenge (eg, frequent, sustained, severe droughts; drained aquifers and consequent lack of water for rural towns as well as land subsidence) is becoming worse and worse with climate change. Allowing beavers to rebuild ponds, lakes, and wetlands may provide benefits to the environment and society that far outweigh agricultural loss.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ann Harvey
CA 94609-1549

Info CaliforniaWDM

From: heidilynn@everyactioncustom.com on behalf of Heidi Lynn
<heidilynn@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:46 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

PLEASE STOP THIS KILLING NOW!!!!!!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Heidi Lynn
CA 91977-1319

Info CaliforniaWDM

From: d_epperson@everyactioncustom.com on behalf of Daniel Epperson
<d_epperson@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091) RAMP REMOVAL OF THE OVERABUNDANCE OF THE PREDATOR COLUMN

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt the proposed plan to continue killing wildlife. THIS alternative would help Wildlife Services focus on proven-effective EFFECTIVE methods for addressing conflicts with wildlife — for example, helping livestock operators SHOOT PREDATORS AND NOT install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that NONlethal conflict-deterrence measures are LEAST effective for long-term results and that simply killing wildlife can lead to LESS CONFLICTS WITH VIOLATING ANIMALS.

Further, killing wildlife STRENGTHENS the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are EFFECTIVE AND EFFICIENT. Those methods include using gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race across the landscape under airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to HARASS wildlife.

I also request that Wildlife Services take a closer look at how its program could MANAGE California's DESTRUCTIVE wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's VICIOUS wolves. It can rely on previous, EFFECTIVE AND EFFICIENT consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. WHEREVER THEY ROAM WILDLIFE POPULATIONS ARE BEING DECIMATED AND BIODIVERSITY IS BEING ELIMINATED.

It's time for Wildlife Services to STEPUP working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of THE EFFECTIVE AND EFFICIENT PROPOSED PLAN

Sincerely,
Daniel Epperson
CA 95640-9722

Info CaliforniaWDM

From: itzmeee@everyactioncustom.com on behalf of Carolyn Barkow
<itzmeee@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:36 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It is urgent that Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

I don't want anyone's tax dollars being used to kill wildlife.

Wildlife Services program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Carolyn Barkow
CA 92119-1716

Info CaliforniaWDM

From: trina.warren@everyactioncustom.com on behalf of Trina Warren
<trina.warren@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:35 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Tens of thousands of coyotes, beavers, and other animals are being wiped out in California. Every year.

Shooting, trapping, poisoning, and otherwise killing these animals also risks the lives of endangered wolves, who are just not reestablishing themselves in California.

I am writing to urgently ask Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Trina Warren
CA 94063-1330

Info CaliforniaWDM

From: angiegrosland@everyactioncustom.com on behalf of Angie Grosland Jones
<angiegrosland@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:32 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I have always loved wildlife and believe they deserve our protection and respect. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Angie Grosland Jones
CA 92122-3140

Info CaliforniaWDM

From: jbayer820@everyactioncustom.com on behalf of Judith Bayer <jbayer820@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:30 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a member of the California Wolf Conservation Center and a wildlife advocate, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Judith Bayer
CA 92126-1370

Info CaliforniaWDM

From: eazenker@everyactioncustom.com on behalf of Rev. Elisabeth Zenker
<eazenker@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:26 PM
To: Info CaliforniaWDM
Subject: PLEASE Protect California's wildlife! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As ALL native life forms ARE Sacred, is why I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its analysis of environmental to be used. Not using the proposed plan to continue KILLING wildlife! These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, in a way of Mutual Support, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems! And many of the methods Wildlife Services now uses (and proposes to keep using) are UNETHICAL and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rev. Elisabeth Zenker
CA 95501-4348

Info CaliforniaWDM

From: lagonegro@everyactioncustom.com on behalf of Sean Lagonegro
<lagonegro@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:24 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sean Lagonegro
CA 91501-1728

Info CaliforniaWDM

From: gbkorel@everyactioncustom.com on behalf of Greg Korelich
<gbkorel@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:21 PM
To: Info CaliforniaWDM
Subject: PLEASE Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Greg Korelich
CA 95401-3605

Info CaliforniaWDM

From: ljpenrose@everyactioncustom.com on behalf of Linda Penrose
<ljpenrose@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:20 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for reading and seriously considering the points of this message.

Sincerely,
Linda Penrose
CA 90275-5923

Info CaliforniaWDM

From: edingerea@everyactioncustom.com on behalf of Elizabeth Edinger
<edingerea@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:20 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis, rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, under these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation based on only six wolves, all of whom were members of the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations far beyond where the Lassen pack ranges, including Modoc, Siskiyou, Tehama, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or Alternative 3.

Sincerely,
Elizabeth Edinger
CA 91601-3981

Info CaliforniaWDM

From: magicalmoon@everyactioncustom.com on behalf of FRANCESCA BOLOGNINI
<magicalmoon@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

THE AMOUNT OF KILLING BEING DONE IN THE NAME OF "SERVICE" IS BEYOND DISGUSTING. THERE IS NO EXCUSE FOR SUCH PANDERING TO AN INDUSTRY LIKE "LIVESTOCK", ANOTHER "KILLING" INDUSTRY, THAT ALSO HAPPENS TO BE HIGH POLLUTING AS WELL, IS AS RIDICULOUSLY UNSUSTAINABLE AS IT IS IMMORAL. STOP. JUST STOP THIS WHOLESAL BARBARISM FOR THE BENEFIT OF RROFIT FOR A FEW. IT HARMS THE BALANCE OF NATURE BEYOND REPARATION.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
FRANCESCA BOLOGNINI
CA 93428-5411

Info CaliforniaWDM

From: nancy1@everyactioncustom.com on behalf of Nancy Garret <nancy1@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

The science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Nancy Garret
CA 94062-3934

Info CaliforniaWDM

From: paulette_ross@everyactioncustom.com on behalf of PAULETTE ROSS
<paulette_ross@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:11 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

YES,YES PLEASE STOP THE SLAUGHTER OF WILDLIFE: WOLVES AND MORE. THIS ISSUE IS MORE IMPORTANT TO ME AND MANY OTHERS THAN MOST OF THE OTHER ISSUES OUT THERE. THE EARTH NEEDS TO THRIVE AND BE ABUNDANT RATHER THAN ERASING WILDLANDS AND WILDLIFE BECAUSE OF SELFISH DEMANDS FROM CATTLEMEN AND PROPERTY DEVELOPERS.

Sincerely,
PAULETTE ROSS
CA 95476-3452

Info CaliforniaWDM

From: vasumurti@everyactioncustom.com on behalf of Vasu Murti
<vasumurti@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:09 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

The Democratic Party platform should support: Animal Rights, Defending the Affordable Care Act, Ending Citizens United, Ending Marijuana Prohibition, Giving Greater Visibility to Pro-Life Democrats, Gun Control, Net Neutrality, Raising the Minimum Wage to \$15 an Hour, Responding to the Scientific Consensus on Global Warming, and a Sustainable Energy Policy. Democrats for Life of America, 10521 Judicial Drive, #200, Fairfax, VA 22030, (703) 424-6663

Sincerely,
Vasu Murti
CA 94611-1166

Info CaliforniaWDM

From: catsdogsnroses@everyactioncustom.com on behalf of barbara poland
<catsdogsnroses@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:05 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services 'Ranching and Corporate Services', to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
barbara poland
CA 91214-2007

Info CaliforniaWDM

From: fogfairy@everyactioncustom.com on behalf of Laura Strom
<fogfairy@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your time.

Sincerely,
Laura Strom
CA 90034-4653

Info CaliforniaWDM

From: eval01@everyactioncustom.com on behalf of Eva Lydick <eval01@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:01 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Any functioning ecosystem need predators. By eliminating these creatures, you impoverish our natural world and California's lands. There are ways to mitigate the loss of livestock and to placate ranchers without killing an integral part of our native biological resources.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Eva Lydick
CA 92637-4761

Info CaliforniaWDM

From: johnpasqua57@everyactioncustom.com on behalf of John Pasqua <johnpasqua57@everyactioncustom.com>
Sent: Monday, March 4, 2024 5:01 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Protection for the wildlife.

Sincerely,
John Pasqua
CA 92025-5005

Info CaliforniaWDM

From: grstewart@everyactioncustom.com on behalf of Glenn Stewart
<grstewart@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:45 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a Professor Emeritus of Zoology and Environmental Science, I am using text from the CBD with which I agree, to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your attention to my comments!

Sincerely,
Glenn Stewart
CA 91750-2303

Info CaliforniaWDM

From: ellenlea@everyactioncustom.com on behalf of Ellen Van Allen
<ellenlea@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:43 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am asking Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ellen Van Allen
CA 95404-5152

Info CaliforniaWDM

From: bigwiscon@everyactioncustom.com on behalf of Su Libby
<bigwiscon@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:41 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. In fact this is the most egregious use of Taxpayer \$\$\$ I can think of. About 15 years ago the Sacramento Bee did a week long front page expose of Wildlife Services. Unfortunately it didnt make a dent in yourfunding or your anachronistic methodology. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Su Libby
OR 97402-6607

Info CaliforniaWDM

From: violaura@everyactioncustom.com on behalf of Laura Chinn-Smoot
<violaura@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:29 PM
To: Info CaliforniaWDM
Subject: Take Care of California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We belong to the land, the land does not belong to us. The animals do not belong to us. We need to live in harmony with the animals. We try to minimize the loss of the farmers flocks and herds as we take up the land of these wild animals. We can do it.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Laura Chinn-Smoot
CA 94121-3703

Info CaliforniaWDM

From: imgreen05@everyactioncustom.com on behalf of Marcy Greenhut <imgreen05@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:17 PM
To: Info CaliforniaWDM
Subject: No more "Wildlife Services" killings; Protect California's wildlife

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Marcy Greenhut
CA 94805-1163

Info CaliforniaWDM

From: jerrymartien@everyactioncustom.com on behalf of jerry martien
<jerrymartien@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:15 PM
To: Info CaliforniaWDM
Subject: Do your fucking job. Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
jerry martien
CA 95503-9604

Info CaliforniaWDM

From: eeliasmail@everyactioncustom.com on behalf of Evan Elias
<eeliasmail@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:10 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

California's wild creatures deserve protection and the right to live their lives. Murdering large numbers of wild animals to appease the livestock industry upsets the natural ecosystems. These creatures are part of larger ecosystems, and they all play their parts. The livestock industry is not a natural part of California. Large scale livestock operations often damage and deplete the environment by over-grazing and erosion. They use up tremendous amounts of water and produce large amounts of animal waste.

California is also now the steward of seven packs of endangered wolves that we need to protect. The methods of killing wild animals are pretty indiscriminate. Traps can catch anyone, including humans and pets. Shooting wolves from helicopters, which is an absolutely horrific practice, doesn't allow for careful identification of the type of wolves that are being terrorized.

I urge the US Dept of Agriculture to stop killing California wildlife in the name of protecting crops and livestock. Our wild creatures living in their natural habitats should be accorded the same or greater protections than disruptive and destructive livestock farming. Please adopt Alternative 2 or 3 in your environmental analysis. We need to learn to live with our wild creatures, especially as we are encroaching more and more into their territory.

Sincerely,
Evan Elias
CA 94109-7676

Info CaliforniaWDM

From: marileejanine@everyactioncustom.com on behalf of Marilee Potthoff
<marileejanine@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:06 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry's ineffective and misguided lethal tactics and start using - and encouraging ranchers to use - much more effective non-lethal means to protect both native wildlife and livestock. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Marilee Potthoff
CA 90045-1245

Info CaliforniaWDM

From: lisadice@everyactioncustom.com on behalf of Lisa Dice
<lisadice@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:05 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I have lived in northern California for almost 30 years and I completely support these changes to the agency of Wildlife Services. It is long overdue. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lisa Dice
CA 96002-0511

Info CaliforniaWDM

From: plball@everyactioncustom.com on behalf of Pamela Ball
<plball@everyactioncustom.com>
Sent: Monday, March 4, 2024 4:02 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3 Be Wildlife Helpers... not Wildlife Killers!

Sincerely,
Pamela Ball
CA 94577-4903

Info CaliforniaWDM

From: robinwinburn@everyactioncustom.com on behalf of William Winburn
<robinwinburn@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)!

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's high time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
William Winburn
CA 90275-6938

Info CaliforniaWDM

From: hhonor0421@everyactioncustom.com on behalf of Valerie Martin <hhonor0421@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I probably don't matter to you since I am over 70, but maybe future generations do. I grew up, and still live, in California. I have watched this state and this country sold out. We cannot bring back what we have already squandered, but you could stop destroying what is left.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Valerie Martin
CA 95531-3204

Info CaliforniaWDM

From: amcattail1@everyactioncustom.com on behalf of lee margot <amcattail1@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:54 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Protect the wolves and other wildlife!

Sincerely,
lee margot
CA 92104-5442

Info CaliforniaWDM

From: jkanoff@everyactioncustom.com on behalf of Julie Kanoff
<jkanoff@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Killing wildlife is a no-win situation. The natural order is kept perpetually out of balance. It is especially egregious when doing so is at the behest of livestock ranchers with an already outsized and depredatory impact on the environment. Thus, I write to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Julie Kanoff
CA 95819-2023

Info CaliforniaWDM

From: yowlsalot@everyactioncustom.com on behalf of C Stanik
<yowlsalot@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Humans need to control their own population, and to allow wildlife to exist and to thrive.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
C Stanik
CA 95076-8708

Info CaliforniaWDM

From: rslnipomo@everyactioncustom.com on behalf of Randee LaSalle
<rslnipomo@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:52 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

You can make this right by using my tax dollars for positive rather than negative outcomes in the long run. Be on the leading edge of promoting wildlife survival by using your leadership to educate and preserve our chain of life by urging Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Our children and grandchildren will thank you for siding with innovative plans for survival of the chain of life.

Sincerely,
Randee LaSalle
CA 93444-9392

Info CaliforniaWDM

From: kuti3058@everyactioncustom.com on behalf of Michael Kutilek <kuti3058@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:48 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a professional wildlife biologist, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Michael Kutilek
CA 95112-2368

Info CaliforniaWDM

From: leahredwood@everyactioncustom.com on behalf of Leah Redwood
<leahredwood@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:43 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a mother who understand the importance of keystone species in our ecosystems to the long-term survival of my child and all children, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Leah Redwood
CA 94703-2011

Info CaliforniaWDM

From: ballade-moment02@everyactioncustom.com on behalf of Lawrence Carbary <ballade-moment02@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:42 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I ask Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working in the best interest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lawrence Carbary
CA 94131-2562

Info CaliforniaWDM

From: skmorris101@everyactioncustom.com on behalf of Sharon Morris <skmorris101@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:41 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly request that Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven effective nonlethal methods for addressing conflicts with wildlife; for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it must act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. I don't want anyone's tax dollars used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges; including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Wildlife Services should end work at the behest of the livestock industry in order to protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sharon Morris
CA 94577-1831

Info CaliforniaWDM

From: quackz2022@everyactioncustom.com on behalf of Ken M <quackz2022@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:39 PM
To: Info CaliforniaWDM
Subject: California's wildlife (APHIS-2020-0091) Needs Protection

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your consideration.

Sincerely,
Ken M
CA 93448

Info CaliforniaWDM

From: appyutoo@everyactioncustom.com on behalf of Ross Bullard
<appyutoo@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:36 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As an American taxpayer and environmentalist, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ross Bullard
CA 95006-9110

Info CaliforniaWDM

From: jpchinn@everyactioncustom.com on behalf of Jason Chinn
<jpchinn@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:22 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We need a diverse eco system to survive, and the livestock industry is against our environment and ecosystem.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jason Chinn
CA 95425-5457

Info CaliforniaWDM

From: earthspiritsf@everyactioncustom.com on behalf of Jean Lindgren
<earthspiritsf@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:21 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife!!!!!!!!!!!!!! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I very strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife!!!!!! These alternatives will help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep!!!!!!!!!! Importantly, with these alternatives, no tax dollars will go toward killing wildlife for the benefit of the livestock industry!!!!!!!!!!!!!!

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science!!!!!!!!!! That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts!!!!!!!!!!!!!!

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jean Lindgren
CA 94103-3367

Info CaliforniaWDM

From: scarab@everyactioncustom.com on behalf of Jim Perry
<scarab@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:18 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Cows and hamburgers are killing us all.

Sincerely,
Jim Perry
CA 95403-2169

Info CaliforniaWDM

From: shashacooks@everyactioncustom.com on behalf of Anastasia Yovanopoulos
<shashacooks@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:16 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Dear decision maker:

Protect California's wildlife (APHIS-2020-0091)

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its

environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Anastasia Yovanopoulos
CA 94114-3942

Sincerely,
Anastasia Yovanopoulos

Info CaliforniaWDM

From: Karton47@everyactioncustom.com on behalf of Karen Weston <Karton47@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:10 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

I realize wildlife services enjoys killing as many animals as they can, so I'm not holding my breath. Wildlife Service what a fucking oxymoron

Sincerely,
Karen Weston
CA 93551-3310

Info CaliforniaWDM

From: janis@everyactioncustom.com on behalf of Janis Hatlestad
<janis@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:10 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a person of faith, with respect for all life on earth, I earnestly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janis Hatlestad
CA 91364

Info CaliforniaWDM

From: ekoboy3@everyactioncustom.com on behalf of Karsten Mueller <ekoboy3@everyactioncustom.com>
Sent: Monday, March 4, 2024 3:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Karsten Mueller
CA 95060-1766

Info CaliforniaWDM

From: gmwhisen@everyactioncustom.com on behalf of Gretchen Whisenand
<gmwhisen@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want my tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Gretchen Whisenand
CA 95404-3242

Info CaliforniaWDM

From: jeffery@everyactioncustom.com on behalf of Jeffery Garcia
<jeffery@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I firmly believe that we should live in respect and harmony with wildlife. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jeffery Garcia
CA 95460-1166

Info CaliforniaWDM

From: cascade@everyactioncustom.com on behalf of Elaine Cook
<cascade@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As someone who loves hiking and seeing wildlife, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Elaine Cook
CA 94928-1724

Info CaliforniaWDM

From: Chrisrose1994@everyactioncustom.com on behalf of Chris Rose <Chrisrose1994@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:58 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Chris Rose
CA 94952-4839

Info CaliforniaWDM

From: pbrigham@everyactioncustom.com on behalf of Paul Brigham
<pbrigham@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:57 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a citizen and parent who cares deeply about our environment, I believe we must do everything within our power to protect it and its inhabitants for future generations.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Paul Brigham
CA 94930-1963

Info CaliforniaWDM

From: mellippincott@everyactioncustom.com on behalf of Melissa Lippincott
<mellippincott@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:56 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. It sickens me that anyone would murder wildlife to protect domestic animals let alone that one cent of my tax dollars going to support this slaughter.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Melissa Lippincott
CA 93950-5508

Info CaliforniaWDM

From: bkbarron@everyactioncustom.com on behalf of Bridget Barron
<bkbarron@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:56 PM
To: Info CaliforniaWDM
Subject: PLEASE Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective, nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I do not want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for listening to my voice on this matter.

Sincerely,
Bridget Barron
CA 94960-1002

Info CaliforniaWDM

From: llpiano@everyactioncustom.com on behalf of Linda Love
<llpiano@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:56 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

It is outrageous to slaughter wolves, coyotes, and other predators for the sake of the livestock industry. Besides the wholesale slaughter of animals that have a right to live, Wildlife Services is tampering with an ecological balance. Please adopt Alternative 2 or 3

Sincerely,
Linda Love
CA 93532-0966

Info CaliforniaWDM

From: kwilcox99@everyactioncustom.com on behalf of Kenneth Wilcox <kwilcox99@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

I don't believe that Wildlife Services should be focusing so heavily on "wildlife-damage management." I think it is equally important to be focusing on livestock-damage management--in particular, livestock's damage to wildlife.

Sincerely,
Kenneth Wilcox
CA 95811-7105

Info CaliforniaWDM

From: hunt.elhunt@everyactioncustom.com on behalf of Eileen Hunt
<hunt.elhunt@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:51 PM
To: Info CaliforniaWDM
Subject: PROTECT: California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Eileen Hunt
CA 95120-4439

Info CaliforniaWDM

From: safutrel@everyactioncustom.com on behalf of Sherrill FUTRELL
<safutrel@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:51 PM
To: Info CaliforniaWDM
Subject: YOU EMBARRASS THE ADMINISTRATION. Protect California's wildlife
(APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sherrill FUTRELL
CA 95618-5421

Info CaliforniaWDM

From: defeather@everyactioncustom.com on behalf of Denise Featherstone
<defeather@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:51 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

I will never understand the attitude Wildlife Services has toward wild animals. It's as if there was a mandate to control all wildlife by killing them, oftentimes regardless of their protected status. Wildlife has a right to life, just like humans do. Unfortunately, many humans have the desire to kill, making excuses for this abominable behavior.

Please do what you can to use positive means of control, such as Alternatives 1 and 2.

Sincerely,
Denise Featherstone
CA 92223-7394

Info CaliforniaWDM

From: plwalker76@everyactioncustom.com on behalf of Patricia Walker <plwalker76@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:45 PM
To: Info CaliforniaWDM
Subject: Protect All of California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

To the average American citizen, including me, "Wildlife Services" implies services meant to protect, nourish and otherwise safeguard wildlife living in the U.S. It is appalling to learn that instead Wildlife "Services" means trapping, shooting, poisoning and killing the animals that American citizens revere and hope to spot in their habitat. I, among many California residents, was thrilled to learn that wolves are making a comeback in California. Perhaps we won't have to travel to Yellowstone to hope to catch a glimpse of them. But I was horrified to learn that your program involves killing coyotes, beavers, and other animals and that now wolves are also at risk.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Patricia Walker
CA 94025-2319

Info CaliforniaWDM

From: boyle69@everyactioncustom.com on behalf of Lea Boyle <boyle69@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Please let's work together and make this happen.... Our native wildlife deserve it !

Sincerely,
Lea Boyle
CA 94526-2238

Info CaliforniaWDM

From: kirk@everyactioncustom.com on behalf of Kirk Lumpkin
<kirk@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:37 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We need more stringent management of negative human damage to wildlife and less killing of wild animals in the name of "service." There are proven alternatives to the current massacre mission of "Wildlife Services." I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kirk Lumpkin
CA 95490-0067

Info CaliforniaWDM

From: everyanimalneedskindness@everyactioncustom.com on behalf of deborah y chew
<everyanimalneedskindness@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:37 PM
To: Info CaliforniaWDM
Subject: DO NOT CAUSE EXTINCTION OF OUR WILDLIFE!!!

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
deborah y chew
CA 90717-3139

Info CaliforniaWDM

From: mgarland007@everyactioncustom.com on behalf of Missy Garland <mgarland007@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:36 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wolves are incredibly valuable on every level. We need them on this planet. You can make a positive impact on their lives. Please do. It's time to help native wildlife! Before they're extinct.

Let's make this a priority. Thank you for taking this to heart.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Missy Garland
CA 92660-9007

Info CaliforniaWDM

From: julianmunoz235@everyactioncustom.com on behalf of Julian Munoz <julianmunoz235@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:35 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Among the many issues that your agency deals with, this one needs special attention.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Julian Munoz
CA 94110-5609

Info CaliforniaWDM

From: edithogella@everyactioncustom.com on behalf of Edith Ogella
<edithogella@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:33 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

If cattle ranchers are concerned about their cattle, they should do what the sheep herders do. They have guard dogs that are quite effective.

Sincerely,
Edith Ogella
CA 93111-2847

Info CaliforniaWDM

From: ginarina@everyactioncustom.com on behalf of Gina Ortiz
<ginarina@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:29 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)- Please stop this needless killing

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Gina Ortiz
CA 91711-1644

Info CaliforniaWDM

From: kegreenebaum@everyactioncustom.com on behalf of Katharine Greenebaum
<kegreenebaum@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Because I believe that California wildlife is essential to the well being of all of us and irreplaceable, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Katharine Greenebaum
CA 91335-4174

Info CaliforniaWDM

From: renepvoss@everyactioncustom.com on behalf of Rene Voss
<renepvoss@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to consider adopting either Alternative 2 or Alternative 3 instead of the proposed plan to continue the lethal control of wildlife. These alternatives prioritize the use of proven nonlethal methods to address conflicts between wildlife and humans. For instance, they promote strategies such as assisting livestock operators in installing deterrents like fencing or motion-sensing lights to discourage predators from approaching cattle or sheep. Notably, neither of these alternatives involves the expenditure of taxpayer money on wildlife killing activities that primarily benefit the livestock industry.

Given that Wildlife Services is a federal program tasked with managing conflicts between humans and wildlife, it is crucial for it to align its actions with the latest scientific understanding. Current scientific consensus emphasizes the effectiveness of nonlethal conflict mitigation measures for achieving sustainable outcomes, highlighting that simply killing wildlife can exacerbate conflicts over time.

Moreover, the indiscriminate killing of wildlife diminishes the diverse ecosystems necessary for ecological health. Many of the methods currently employed by Wildlife Services, and proposed to continue, are considered both unethical and inhumane. These methods include the use of inhumane trapping devices, fumigation of dens and burrows, and aerial gunning operations that subject animals to extreme distress and suffering.

Therefore, it is imperative that taxpayer funds not be allocated to support such practices. Additionally, I urge Wildlife Services to thoroughly evaluate the potential negative impact of its activities on California's endangered wolf population. As mandated by the federal Endangered Species Act, Wildlife Services must engage in consultation with the U.S. Fish and Wildlife Service to develop and implement measures aimed at preventing harm to the state's vulnerable wolf population. This consultation process should be updated to reflect the current status of California's wolf population, which has expanded beyond the historical range of the Lassen pack.

It is time for Wildlife Services to prioritize the protection of native wildlife over catering to the interests of the livestock industry. I wholeheartedly support the adoption of either Alternative 2 or Alternative 3 as a step towards achieving this goal.

Sincerely,
Rene Voss
CA 94960-1601

Info CaliforniaWDM

From: lara.wright@everyactioncustom.com on behalf of Lara Wright
<lara.wright@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:27 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife, for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. Further, many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. Wildlife Services can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges; including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It is past time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. Therefore, I strongly support the adoption of Alternative 2 or 3.

Thank you for reading my letter.

Sincerely,
Lara Wright
CA 94706-2343

Info CaliforniaWDM

From: rich@everyactioncustom.com on behalf of Rich Moser <rich@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:26 PM
To: Info CaliforniaWDM
Subject: Who does this serve? Not the wildlife! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rich Moser
CA 93111-2718

Info CaliforniaWDM

From: htafrica@everyactioncustom.com on behalf of Thomas J Boo
<htafrica@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:25 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

It may also be time for Wildlife Services to be disbanded, or at the least, cease operations in California. If I were President...

Sincerely,
Thomas J Boo
CA 93514-7048

Info CaliforniaWDM

From: vidakenk@everyactioncustom.com on behalf of Vida Kenk
<vidakenk@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:24 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am a retired college professor of ecological biology. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Vida Kenk
CA 95223-4550

Info CaliforniaWDM

From: csoragha@everyactioncustom.com on behalf of C s
<csoragha@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:22 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Please protect our iconic and endangered wildlife - NOT the enormous profits of the greedy, self-entitled livestock industry!!!

Sincerely,
C s
CA 92107

Info CaliforniaWDM

From: ccjohansen@everyactioncustom.com on behalf of Cinda Johansen
<ccjohansen@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:21 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. "These magnificent apex creatures just want to live their lives and raise their families without our interference." STOP MURDERING THEM!!!

Sincerely,
Cinda Johansen
CA 95630-7928

Info CaliforniaWDM

From: amy7w2m@everyactioncustom.com on behalf of Amy Meyer
<amy7w2m@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:21 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It is important to protect California's wildlife as well as to protect the livestock industry. The best way to protect wildlife is with non-lethal methods that keep wild animals away from livestock.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Amy Meyer
CA 94121-1601

Info CaliforniaWDM

From: amy1968@everyactioncustom.com on behalf of Amy Wolfberg <amy1968@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:20 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am a lifelong Californian horrified and disgusted at the war Wildlife Services is waging against wildlife to benefit ranchers, farmers, golf courses, etc. The waste of wildlife is sickening! Enough of this carnage already!! To that end, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Amy Wolfberg
CA 90046-2332

Info CaliforniaWDM

From: jahoaglund@everyactioncustom.com on behalf of Judith Hoaglund
<jahoaglund@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:19 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Predators are essential members of all ecosystems and should be valued and protected by Wildlife Services. The old ways and reasons for killing these important species must to be brought into the 21st century. where they are recognized for their vital contribution to the health of all.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it must act according to the best available current science. Science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Judith Hoaglund
CA 95401-3741

Info CaliforniaWDM

From: ranger352@everyactioncustom.com on behalf of Joseph White <ranger352@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:19 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge the Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Joseph White
CA 95614-0262

Info CaliforniaWDM

From: drv1@everyactioncustom.com on behalf of Dennis Villavicencio <drv1@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It is stunning to believe that our tax dollars are being used to kill wildlife at great cost to taxpayers, wildlife and the environment.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Dennis Villavicencio
CA 93271-9709

Info CaliforniaWDM

From: stubbie7@everyactioncustom.com on behalf of Katie Brammer <stubbie7@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Katie Brammer
CA 94952-4014

Info CaliforniaWDM

From: jeanwoodrow@everyactioncustom.com on behalf of Jean Woodrow
<jeanwoodrow@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Wolves are vital to a vibrant and sustainable ecosystem not cattle.

Sincerely,
Jean Woodrow
CA 90732

Info CaliforniaWDM

From: pauledelman22@everyactioncustom.com on behalf of Paul Edelman <pauledelman22@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:11 PM
To: Info CaliforniaWDM
Subject: Have a Heart USDA Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Paul Edelman
CA 91364-3313

Info CaliforniaWDM

From: tonyaandandreas@everyactioncustom.com on behalf of Antonia Chianis
<tonyaandandreas@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:10 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

PLEASE HELP - FOR YRS. YOU'VE ALL HAD YOUR HANDS IN WILDLIFE SERVICES POCKETS & THEIRS IN YOURS. WE NEED OUR PRESCIOUS WILDLIFE TO MAINTAIN THE NATURAL BALANCE OF THE PLANET. THEY WERE CREATED AND BORN WITH AN INTENTION TO LIVE. PLEASE LET THEM. WILDLIFE SERVICES HAS LONG TIME, BEEN UNFAIR AND MORE HORRIBLE THAN CRUEL TO THESE BELOVED CREATURES. IT'S MORE THAN TIME TO CHANGE THIS. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Antonia Chianis
CA 92317-0836

Info CaliforniaWDM

From: heyjudenf@everyactioncustom.com on behalf of Judy Schultz
<heyjudenf@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:04 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We have "lost" so much wildlife in the past five-seven decades - some studies say 50%-70% of wildlife is now gone, due to human activities like development-related habitat loss, pesticides, climate change, and hunting - that we must protect what remains. We can no longer engage in mass killing of wildlife, especially not to protect the livestock industry, which is itself exacerbating climate change and habitat loss.

I am writing to implore you to adopt Alternative 2 or Alternative 3 in your environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

As you know, many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane, and cannot be justified. Methods like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals are cruel, unnecessary, and using taxes to support them is completely unacceptable.

Please also seriously review how your killing program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Please protect native wildlife by adopting Alternative 2 or 3.

Thank you for your consideration.

Sincerely,
Judy Schultz
CA 94115-2927

Info CaliforniaWDM

From: fmcchesney@everyactioncustom.com on behalf of Frances McChesney
<fmcchesney@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:04 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Learning that our federal wildlife agencies are killing wildlife for the livestock industry was very disturbing. You should not be in that business. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Frances McChesney
CA 95616-0422

Info CaliforniaWDM

From: thompsonsabrina@everyactioncustom.com on behalf of Sabrina Thompson
<thompsonsabrina@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:03 PM
To: Info CaliforniaWDM
Subject: PLEASE!!! Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sabrina Thompson
CA 95762-9404

Info CaliforniaWDM

From: neschweiger@everyactioncustom.com on behalf of Nan Schweiger
<neschweiger@everyactioncustom.com>
Sent: Monday, March 4, 2024 2:01 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. Stop the killing. I had no idea this was going on in my state. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Nan Schweiger
CA 95007

Info CaliforniaWDM

From: stellacarmela@everyactioncustom.com on behalf of Carmela Vignocchi
<stellacarmela@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on proven-effective NON-LETHAL methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, NO tax DOLLAR\$ would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are MOST EFFECTIVE for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act REQUIRES, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Thank you

Sincerely,
Carmela Vignocchi
CA 93433-1344

Info CaliforniaWDM

From: secretsoundstudios@everyactioncustom.com on behalf of Pete Dacy
<secretsoundstudios@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Dear people

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you so for your time

Sincerely,
Pete Dacy
CA 91607

Info CaliforniaWDM

From: threegables1819@everyactioncustom.com on behalf of Karen Jacques
<threegables1819@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:54 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

The world is in a biodiversity/extinction crisis. Continuing to allow the killing of wildlife to solve whatever problem/inconvenience they are alleged to have caused by livestock industry is completely unacceptable. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed, cruel and unethical plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Please remember that you work for the public, not the livestock industry and it is our tax dollars you are spending.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane and never ever should have been used in the first place. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. This is totally unethical behavior by a public agency. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. These precious wolves must remain protected.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. The livestock industry is responsible for immense environmental harm, including green house gas emissions. It should not be given any sort of favorable treatment. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Karen Jacques
CA 95811-7105

Info CaliforniaWDM

From: mjasper2@everyactioncustom.com on behalf of Marilyn Jasper <mjasper2@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:53 PM
To: Info CaliforniaWDM
Subject: CA wildlife-agency-killed as "Collateral Damage" MUST be deemed illegal (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Rather than the proposed plan to continue killing wildlife, Wildlife Services (as well as any other “agency” or individual) needs to follow laws and stop killing all non-targeted wildlife. If a citizen kills a listed species, or any other illegal non-targeted wildlife or game, it may indeed be (or should be) a serious violation and worthy of prosecution, fines, license revocations, or more.

Wildlife Services, (WS) first, should be held to a higher standard, as most law-enforcement officers and agencies are. Second, WS needs to be equally compliant and responsible by following all laws for any/all of its wildlife killing operations. If WS claims that non-lethal methods are too costly, killing non-targeted wildlife is part of the process, or that non-lethal is impractical for any other reasons, thus will not comply, then a moratorium must be imposed on all WS killing of any wildlife.

Taxpayers should never be funding any agency that is acting as a hired handmaiden for private individual businesses or industries. WS’s entire divisions, officers, staff, etc., need to be educated and either proceed with new operations that ban lethal options or have WS disbanded and assign wildlife conflicts to other agencies.

We urge WS to adopt Alternative 2 or Alternative 3 in its environmental analysis. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it’s essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don’t want anyone’s tax dollars being used to kill wildlife.

We request that Wildlife Services take a closer look at how its program could hurt California’s endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state’s vulnerable wolves. It can’t rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California’s sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife: Adopt Alternative 2 or 3.

Sincerely,
Marilyn Jasper
CA 95650-9749

Info CaliforniaWDM

From: perrygxx@everyactioncustom.com on behalf of Perry Gx
<perrygxx@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Time Is Now To Protect California's Wolves Period.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Perry Gx
CA 92780-7011

Info CaliforniaWDM

From: smpamr@everyactioncustom.com on behalf of Sheila Rollins
<smpamr@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:50 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We need more wildlife, not more livestock!!! urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sheila Rollins
CA 92637-1824

Info CaliforniaWDM

From: victoriavvance@everyactioncustom.com on behalf of victoria vance
<victoriavvance@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:49 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

I am **100** in agreement with the above request and **100** against the way our federal Wildlife Services does NOT serve wildlife and instead protects big ag. I don't want any of my tax dollars paying for the salaries of administration and staff to torture, trap, harm and murder millions of animals every year it is abhorrent !!!

Or have our money spent on their torture and murder equipment.

Victoria Vance MFT

Sincerely,
victoria vance
CA 95524-9334

Info CaliforniaWDM

From: kevinjr1@everyactioncustom.com on behalf of Kevin Roe <kevinjr1@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:49 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Our wildlife is part of our national heritage and resources. Be in favor of the animals.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kevin Roe
CA 95005-9449

Info CaliforniaWDM

From: happeevegan@everyactioncustom.com on behalf of Mark Feldman
<happeevegan@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:45 PM
To: Info CaliforniaWDM
Subject: PROTECT CALIFORNIA'S WILDFIRE (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mark Feldman
CA 95401-9137

Info CaliforniaWDM

From: jggala@everyactioncustom.com on behalf of Janette Gamble
<jggala@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:45 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to PLEASE adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janette Gamble
CA 95345-0169

Info CaliforniaWDM

From: barbaradincau@everyactioncustom.com on behalf of Barbara Dincau
<barbaradincau@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:45 PM
To: Info CaliforniaWDM
Subject: We need these animals! Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Barbara Dincau
CA 93003-1411

Info CaliforniaWDM

From: lynnmstrandberg@everyactioncustom.com on behalf of Lynn Strandberg
<lynnmstrandberg@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:44 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lynn Strandberg
CA 94110-1622

Info CaliforniaWDM

From: hutcheson@everyactioncustom.com on behalf of Rebecca Swanson
<hutcheson@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Stop killing wolves and other wildlife to benefit the livestock industry.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rebecca Swanson
CA 95338-9772

Info CaliforniaWDM

From: phthompson7@everyactioncustom.com on behalf of paula thompson <phthompson7@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:38 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a taxpayer, I despise that taxes are spent on crap like this.
Livestock owners need to feed their animals on their property and if that raises prices of animal meat so be it.
I'm so sick of being a part of how federal employees are paid to waste TIME and MONEY doing stupid and unethical crap to wildlife for reasons completely Riddiuculous.
Just Stop!

Sincerely,
paula thompson
CA 92057-2118

Info CaliforniaWDM

From: prattprattprattandpratt@everyactioncustom.com on behalf of Hilary Eisma
<prattprattprattandpratt@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:36 PM
To: Info CaliforniaWDM
Subject: Stop the slaughter of California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Hilary Eisma
CA 95503-7316

Info CaliforniaWDM

From: shannonhunter11@everyactioncustom.com on behalf of Shannon Hunter
<shannonhunter11@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:34 PM
To: Info CaliforniaWDM
Subject: Please Protect California's Wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Shannon Hunter
CA 96003-3615

Info CaliforniaWDM

From: al.belmonte@everyactioncustom.com on behalf of Al Belmonte
<al.belmonte@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:33 PM
To: Info CaliforniaWDM
Subject: YOUR ACTION: Protect California's Wildlife (APHIS-2020-0091) -- Now!!!

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for "Wildlife Services" to PROTECT Native WILDLIFE.

I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Al Belmonte
CA 95120-4439

Info CaliforniaWDM

From: mjorgensen1951@everyactioncustom.com on behalf of Mark Jorgensen
<mjorgensen1951@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:33 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Dear USF&WS

I retired as a State Ecologist and CA State Park Superintendent after 36 yrs of service. Most of my life I have studied desert bighorn sheep and other wildlife species, including mt. Lions, coyotes Argarli sheep, ibex and vultures. I have long disagreed with your policies to kill predators and so-called "pests". All the funding to reduce predators has been a waste of money, as many studies have shown. Quit the senseless killing NOW and welcome to the 21st Century!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mark Jorgensen
CA 92004

Info CaliforniaWDM

From: klee@everyactioncustom.com on behalf of John and Katrina Lee
<klee@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:32 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a lifelong Californian, I am proud beyond measure of the nature beauty of our state, and the diversity of the environments and wildlife. All my life I have assumed that the government of California was just as committed to wildlife and wildplaces as I am. So it is a shock to learn about programs of deliberate destruction of animals in the service of special interests like cattle ranchers.

That's why I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
John and Katrina Lee
CA 95757-8376

Info CaliforniaWDM

From: kingett.kathie@everyactioncustom.com on behalf of Kathie Kingett
<kingett.kathie@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:31 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I'm so tired of the balance of nature taking second place to the meat raising industry. Native species should not be killed to protect grazing animals who will then be slaughtered themselves. Public lands are not for subsidies to for-profit industries. I know it happens to more than just wildlife, but let's concentrate on Wildlife Services here.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kathie Kingett
CA 90631-8057

Info CaliforniaWDM

From: bjmatthes@everyactioncustom.com on behalf of Janus Matthes
<bjmatthes@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:29 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

How many times have we ruined the balance of nature with devastating consequences. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janus Matthes
CA 95403-6919

Info CaliforniaWDM

From: kayucian@everyactioncustom.com on behalf of Erin Barca
<kayucian@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:26 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

This destruction at the behest of largely the beef industry, is why I haven't bought beef in nearly two decades. I am long since done with them. This industry offers only loss and zero benefit to me and mine. This exploitation for taste buds is revolting, and I absolutely do not want wildlife to be harmed with my family's tax dollars nor one red cent, nor by anyone else's. I adore our native predators, and all the biodiversity of this land. Less cattle more native flora and fauna, please! More CA ground squirrels, more golden eagles! More tule wapiti, more gray wolves! People and their livestock have taken too much, and keep poisoning, shooting, and otherwise terrorizing the rest. Enough already. "Livestock make up 62% of the world's mammal biomass; humans account for 34%; and wild mammals are just 4%. Humans have transformed the mammal kingdom. A diverse range of mammals once roamed the planet. This changed quickly and dramatically with the arrival of humans. Since then, wild land mammal biomass has declined by an estimated 85%."

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. Biodiversity loss is only accelerating. It would be nice if this agency stopped contributing to a mass extinction event. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

I'd rather restore the integrity of these biological communities than support anyone who thinks their business model is more important than the biosphere. Please stop killing the native non-human life around me. Cattle and sheep degrade the land, competing for shelter and forage, lowering the carrying capacity itself. Polluting and dehydrating watersheds. I don't care if predators occasionally cause mortality before slaughter. Cost of a dirty business.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Erin Barca
CA 94583-1562

Info CaliforniaWDM

From: hollyd1225@everyactioncustom.com on behalf of Holly Dowling <hollyd1225@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:25 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Do the right thing so that our wolf populations can continue to grow.

Sincerely,
Holly Dowling
CA 94947-3624

Info CaliforniaWDM

From: avenidacats@everyactioncustom.com on behalf of Waltraud Buckland
<avenidacats@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:25 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop acting like a 'killing machine' that is working at the behest of the livestock industry and, instead, protect native wildlife! I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Waltraud Buckland
CA 94708-2124

Info CaliforniaWDM

From: louisflores2468@everyactioncustom.com on behalf of Louis Flores <louisflores2468@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:25 PM
To: Info CaliforniaWDM
Subject: Protect Wildlife in California

Dear APHIS-2020-0091 Wildlife Services,

Hello,

I am writing to you in order to urge you to:

1. Adopt Alternative 2 or Alternative 3 rather than continuing the practice of the continuation of killing wildlife.
2. Please use effective non-lethal methods for dealing with predators of livestock.

I hope that your office can refocus its energies and transform its management methods into a system that takes into consideration the needs of wildlife and domesticated animals.

Thank you for taking the time to hear me out.

Sincerely,
Louis Flores
CA 94565-3833

Info CaliforniaWDM

From: m.f.levin@everyactioncustom.com on behalf of Margaret Levin
<m.f.levin@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:24 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

We, as a society, should prioritize finding and implementing methods for solving human - wildlife conflicts that do not rely on the killing of wildlife. I do not support programs that rely on killing wildlife so that we can sustain the livelihood of a small number of people involved in the cattle industry. I do support finding alternative solutions to the challenges that they face. It saddens me deeply that as we are on the brink of re-establishing wildlife populations in our country, we simultaneously hunt and kill those populations that are deemed threatening to our ranchers. The burden for finding solutions should be on us not on our wildlife.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Margaret Levin
CA 95616-2064

Info CaliforniaWDM

From: maryde@everyactioncustom.com on behalf of Mary Dederer
<maryde@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:22 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wolves and other wildlife had paid so dearly for our crops and meat producing industry. Please protect them and their habitat from further limitation and death. When we clearly imagine the wilderness, our hearts ache for the animals we have displaced and felt entitled to kill.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mary Dederer
CA 94025-4237

Info CaliforniaWDM

From: ceedee6163@everyactioncustom.com on behalf of Carol Dvora <ceedee6163@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:19 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Wolves are a necessary part of the eco-system and need to be protected. They have been maligned for too long and need our protection to keep them safe from human predation!!

Sincerely,
Carol Dvora
CA 94595-3043

Info CaliforniaWDM

From: aprilawest@everyactioncustom.com on behalf of april west
<aprilawest@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:15 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. I am a six figure taxpayer in California. I want my tax dollars to PROTECT WILDLIFE instead of supporting the livestock industry that I have no part of.

Sincerely,
april west
CA 95405-6911

Info CaliforniaWDM

From: judygrobv@everyactioncustom.com on behalf of Judith Villablanca
<judygrobv@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:14 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

I have been in person at meetings with ranchers present who have used the alternative methods outlined in this message successfully. Killing wildlife is not the answer. Scientific data from reintroducing wolves to Yellowstone park showed that restoring normal predators re-balances the ecosystem and improves the health of other wildlife and restores native habitat since as riparian habitat. Vengeance against wolves is an old and ignorant battle that needs to end. We can co-exist to the benefit of all.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Judith Villablanca
CA 90265-4479

Info CaliforniaWDM

From: whjaking@everyactioncustom.com on behalf of Jeanette King
<whjaking@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:14 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Killing all those wild animals is not the best way to solve the problem of wildlife and livestock.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jeanette King
CA 94550-3414

Info CaliforniaWDM

From: debjurey@everyactioncustom.com on behalf of Debra Jurey
<debjurey@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It's time to stop killing wildlife to protect livestock. It costs taxpayer money and I think most people if they knew wildlife was being killed to support the livestock industry there would be a massive uproar. against it. There is no need to kill wild life and now with our wolf population it needs to end & coexistence needs to begin. Climate change has become a grim reality and we are losing animals to extinction . An alarming proportion of animals are going extinct it makes no sense to kill the wildlife we still have. I do not like the idea that my tax \$ are being used to kill animals it's maddening and so backwards, it sounds like old methods still being used to solve a simple situation. Tax payer money should be used to protect both wildlife & cattle. Slaughtering one entity is not going to solve any problems & may create more. We need healthy balanced ecosystems which wildlife is good act. Beavers, bears, wolves all play important roles in keeping a healthy ecosystem. Killing them is not the answer & should stop. Aerial hunting & killing especially doesn't sit right with me & I want my hard earned tax \$ protecting and understanding the value wildlife brings to the table. Stop supporting an industry that encourages the killing of wildlife for their own personal gains, especially using our wildlife and our tax dollars to get there.

This being said I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Debra Jurey
CA 93465-9308

Info CaliforniaWDM

From: judithsmith313@everyactioncustom.com on behalf of Judith Smith <judithsmith313@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:07 PM
To: Info CaliforniaWDM
Subject: PLEASE Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Judith Smith
CA 94601-1320

Info CaliforniaWDM

From: steve@everyactioncustom.com on behalf of Steve Kaye
<steve@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:06 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in your environmental analysis rather than the proposed plan to continue killing wildlife.

Sincerely,
Steve Kaye
CA 92870-2529

Info CaliforniaWDM

From: jimtietz@everyactioncustom.com on behalf of James Tietz
<jimtietz@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:06 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

I am totally opposed to Wildlife Services killing wildlife that is in its native range in the United States. The only species that I want Wildlife Services to kill are species that have been introduced by humans to areas where they are not native. Non-native species I would condone Wildlife Services killing in California are Wild Turkey, Nutria, Eastern Red Fox, and European Starling.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
James Tietz
CA 93271-0758

Info CaliforniaWDM

From: jeri.fergus@everyactioncustom.com on behalf of Jeri Fergus
<jeri.fergus@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:06 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Protect the Planet, not the corporations!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jeri Fergus
CA 95560-0511

Info CaliforniaWDM

From: patsilver@everyactioncustom.com on behalf of Patricia Silver
<patsilver@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:04 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am writing to ask that Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than continue the rampant slaying of wildlife.

It's time for Wildlife Services to stop working to appease the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

These alternatives offered would help Wildlife Services focus on nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Most importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science, which concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Nature creates balance! Stop using such cruel methods as body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the worst of them all — aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

For these reasons, I don't want my tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Sincerely,
Patricia Silver
CA 95030-4180

Info CaliforniaWDM

From: hvogler@everyactioncustom.com on behalf of Herbert Vogler III
<hvogler@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:04 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis instead of the proposed plan to continue killing wildlife. Alternatives 2 or 3 would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife. As one example, they would aid livestock operators in installing fencing or motion-sensing lights to deter predators from approaching cattle or sheep. With these alternatives, importantly, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, so it is essential that it act based on the best available current science, which has concluded nonlethal conflict-deterrence measures are most effective for long-term results, and killing wildlife may lead to even more conflicts. Furthermore, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems, and many of the methods Wildlife Services presently uses and is proposing to keep using are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, tax dollars should not be used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It cannot rely on previous, outdated consultation from when California had only six wolves, all members of the Lassen pack. California now has seven wolf packs and a total wolf population of 45 to 50, many of whom inhabit locations in the state far beyond where the Lassen pack ranges, including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It is time for Wildlife Services to stop working at the behest of the livestock industry and instead protect native wildlife. These are the reasons I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Herbert Vogler III
CA 92646-2528

Info CaliforniaWDM

From: ken@everyactioncustom.com on behalf of Ken Wilson <ken@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:04 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

OR CHANGE YOUR NAME TO FARMER SERVICES.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Ken Wilson
CA 95409-3507

Info CaliforniaWDM

From: nicasiotriangle@everyactioncustom.com on behalf of Robin Williams
<nicasiotriangle@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:03 PM
To: Info CaliforniaWDM
Subject: If the industry loses a few crops and livestock, so be it. Our wildlife was here before US!
We have intruded upon the natural order!

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Robin Williams
CA 94946-9760

Info CaliforniaWDM

From: bmuradian@everyactioncustom.com on behalf of Rebecca Muradian
<bmuradian@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Killing wildlife is an ugly option. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rebecca Muradian
CA 94901-5114

Info CaliforniaWDM

From: lindsay.bess@everyactioncustom.com on behalf of Lindsay Bess
<lindsay.bess@everyactioncustom.com>
Sent: Monday, March 4, 2024 1:02 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lindsay Bess
CA 94608-3321

Info CaliforniaWDM

From: redryan@everyactioncustom.com on behalf of patrice ryan
<redryan@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:59 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am sickened at the violent killing free for all of our wildlife to appease livestock farmers. Putting profits before a healthy balance of Nature should never be the priority! These animals have a right to live and thrive in peace. It's livestock that has encroached on the native lands of these animals and not the other way around. It's the farmer who needs to find a non violent way to protect their livestock. Either that or take their livestock elsewhere!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
patrice ryan
CA 95472-4455

Info CaliforniaWDM

From: plmatdhs@everyactioncustom.com on behalf of Pamela Mcdonald
<plmatdhs@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:57 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

NATIVE WILDLIFE IS HERE FOR A REASON! IF PLACED IN A "CONSERVATIVE" WAY, GOD PUT THEM IN OUR ENVIRONMENT TO HELP IT, NOT DAMAGE IT! THE WOLVES ARE HERE TO STOP THE OVER-POPULATION OF WILDLIFE WHO EAT VEGETATION, WHETHER I N FORESTS OR PEOPLE'S PROPERTY. WE DON'T "NEED" MORE CATTLE! WE'RE DISCOVERING THAT TOO MUCH RED MEAT IS DETRIMENTAL TO HEALTH.

WE ARE RUINING OUR WORLD, AND IT MUST STOP!

Sincerely,
Pamela Mcdonald
CA 92505-2221

Info CaliforniaWDM

From: p.a.barni@everyactioncustom.com on behalf of patricia barni
<p.a.barni@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:57 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to protect native wildlife first and foremost. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
patricia barni
CA 93514-7185

Info CaliforniaWDM

From: shomac@everyactioncustom.com on behalf of Shoma Chatterjee
<shomac@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Ranchers need to use nonlethal deterrents and stop driving out the near wolf dens

Sincerely,
Shoma Chatterjee
CA 94115-2146

Info CaliforniaWDM

From: dennis_fritzinger@everyactioncustom.com on behalf of Dennis Fritzinger
<dennis_fritzinger@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife. (Or any dollars.)

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. We, in California, are lucky in that way. Nature is resilient—it will bounce back (sometimes) if we let it bounce back.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Livestock in general are not a good fit for North American ecosystems. Bring back the buffalo!

Sincerely,
Dennis Fritzinger
CA 94704-2113

Info CaliforniaWDM

From: donavanb03@everyactioncustom.com on behalf of Dona van Bloemen <donavanb03@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:55 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your attention to my letter. I look forward to your earliest reply.

Sincerely,
Dona van Bloemen
CA 90405-5305

Info CaliforniaWDM

From: cjwong71@everyactioncustom.com on behalf of Connie Wong <cjwong71@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Shooting, trapping, poisoning and otherwise killing coyotes, beavers, and all other animals also risks the lives of endangered wolves, who are just now reestablishing themselves in California. The state's native creatures have a right to live in peace and play their integral roles in keeping nature healthy, wild and resilient.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Connie Wong
CA 91208-2415

Info CaliforniaWDM

From: ra3ajw@everyactioncustom.com on behalf of A B <ra3ajw@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

DO YOUR JOB.

Sincerely,
A B
CA 94086-0185

Info CaliforniaWDM

From: al4violet@everyactioncustom.com on behalf of Annie Lowe
<al4violet@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please stop the inhumane and brutal killing of wildlife and adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Annie Lowe
CA 95687-3310

Info CaliforniaWDM

From: oboemjm@everyactioncustom.com on behalf of Martha Martin
<oboemjm@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:53 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

long-term results and that simply killing wildlife can lead to even more conflicts.

Stop catering to the cattle industry and start conserving our natural resources and wildlife therein.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-guards. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Martha Martin
CA 94549-4707

Info CaliforniaWDM

From: markschulze@everyactioncustom.com on behalf of Mark Schulze
<markschulze@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:51 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091) NOW !

Dear APHIS-2020-0091 Wildlife Services,

Please help now before it is too late !!!

We urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science.

That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

We also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves.

It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife.

We strongly support the adoption of Alternative 2 or 3.

Thanks Mark and Patty :)

Sincerely,
Mark Schulze
CA 92119-1530

Info CaliforniaWDM

From: annilong@everyactioncustom.com on behalf of Anni Long
<annilong@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:46 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Stop killing wildlife to benefit private individuals and businesses. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators to use protective dogs or install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Killing wildlife endangers the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Anni Long
CA 94941-4543

Info CaliforniaWDM

From: cejewelryonline@everyactioncustom.com on behalf of Cheryl Elkins
<cejewelryonline@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:46 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Cheryl Elkins
CA 92105-5339

Info CaliforniaWDM

From: enylen@everyactioncustom.com on behalf of eric Nylen
<enylen@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:46 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a Californian, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
eric Nylen
CA 95060-3342

Info CaliforniaWDM

From: jbking2@everyactioncustom.com on behalf of ERIC ERICSON <jbking2@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:45 PM
To: Info CaliforniaWDM
Subject: Urgent: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
ERIC ERICSON
CA 90210-3222

Info CaliforniaWDM

From: mmrrser@everyactioncustom.com on behalf of Marianna Riser
<mmrrser@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:43 PM
To: Info CaliforniaWDM
Subject: California's wildlife matters!(APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Marianna Riser
CA 94949-6305

Info CaliforniaWDM

From: mclong27@everyactioncustom.com on behalf of Maria Long <mclong27@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

If the most predatory mammal on earth continues to kill with impunity, all creatures great & small face extinction. The beef industry is more threat to humankind than wolves and for what, a Big Mac? We're living in a time of consequences; only conscientious consumerism can save us from ourselves. destruction. "Wildlife Services" is doublespeak for "serving greed."

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Maria Long
CA 95370-5772

Info CaliforniaWDM

From: dbeal1286@everyactioncustom.com on behalf of Beal Families <dbeal1286@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:40 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Our families implore Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

We also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. The animals that live in our public lands should be left alone and not killed to support special interests.

We strongly support the adoption of Alternative 2 or 3.

Sincerely,
Beal Families
CA 92014

Info CaliforniaWDM

From: kwood@everyactioncustom.com on behalf of Kelly Wood
<kwood@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:38 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge you to stop animal cruelty.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kelly Wood
CA 91104-2306

Info CaliforniaWDM

From: jboone@everyactioncustom.com on behalf of Joseph Boone
<jboone@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:37 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Protect wildlife. Stop killing it.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Joseph Boone
CA 93401-2606

Info CaliforniaWDM

From: mbw565@everyactioncustom.com on behalf of Mary Wiener <mbw565@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:35 PM
To: Info CaliforniaWDM
Subject: We must protect our wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It is time to stop killing wildlife. Please read below for a well written letter of which I completely support.

Wildlife Services must adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mary Wiener
CA 93013-3076

Info CaliforniaWDM

From: susan4@everyactioncustom.com on behalf of Susan Schacher <susan4@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:34 PM
To: Info CaliforniaWDM
Subject: California's wildlife needs protection (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Susan Schacher
CA 94619-1349

Info CaliforniaWDM

From: handz2000@everyactioncustom.com on behalf of Rosann Lynch <handz2000@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:33 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rosann Lynch
CA 93940-1133

Info CaliforniaWDM

From: rcstefaniak@everyactioncustom.com on behalf of Regina Stefaniak
<rcstefaniak@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:33 PM
To: Info CaliforniaWDM
Subject: Let California's wildlife live in peace! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the atrocious proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Those self-entitled grifters have swilled long enough at the public's expense.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

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For thousands of years wolves have served an invaluable function in California's ecosystem, keeping down the deer population (currently invasive even in the Berkeley Hills, where I live, ticks and covid included). I have supported the restoration of wolves in the lower 48 since reading Farley Mowat's book in 1963. As a California resident since 1975 I want wolves restored and thriving in my state at long last. In a time of species extinction it is unconscionable for "services" to reach mindlessly for the most cruel and abhorrent means of killing animals, as if they were vermin. At a time of severe climate stress in California, wolves serve a more useful purpose than methane-burping cows and their ranchers, who in my view should be radically reduced in numbers, if not entirely eliminated. I am completely disgusted by the meat industry. As a vegetarian I have no use for that cruel trade. Stop servicing the needs of greedy ranchers. Start attending to the needs of the planet! Let public lands be used for the benefit of the entire ecosystem. I call on you to let the wolves live in peace!

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,

Regina Stefaniak
CA 94708-1902

Info CaliforniaWDM

From: deepwellproductions@everyactioncustom.com on behalf of Tera Kelley
<deepwellproductions@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:33 PM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Tera Kelley
CA 95014-6800

Info CaliforniaWDM

From: susanlavelle@everyactioncustom.com on behalf of Susan Lavelle
<susanlavelle@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:32 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Non-lethal methods need to be the primary approach in any conflict with the natural world and wildlife. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Susan Lavelle
CA 95076-0127

Info CaliforniaWDM

From: baileyredwood@everyactioncustom.com on behalf of Mark Bailey
<baileyredwood@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:29 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Im truly sick of the disproportionate influence of the livestock industry. I highly resent my tax dollars being used to kill our wildlife.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mark Bailey
CA 95549-9018

Info CaliforniaWDM

From: baileyredwood@everyactioncustom.com on behalf of Mark Bailey
<baileyredwood@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:29 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Mark Bailey
CA 95549-9018

Info CaliforniaWDM

From: ocara2015@everyactioncustom.com on behalf of Cara O'Neill <ocara2015@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

WHY BEAVERS???

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

DO THE JOB WE HIRED U TO DO
PLEASE

Sincerely,
Cara O'Neill
CA 94515-9634

Info CaliforniaWDM

From: ocara2015@everyactioncustom.com on behalf of Cara O'Neill <ocara2015@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

DO THE JOB WE HIRED U TO DO
PLEASE

Sincerely,
Cara O'Neill
CA 94515-9634

Info CaliforniaWDM

From: jajordanjr@everyactioncustom.com on behalf of James Jordan
<jajordanjr@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 of the environmental analysis of APHIS-2020-0091 rather than the proposed plan. These alternatives would help Wildlife Services focus on effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Also, these alternatives would cost less to the taxpayer.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife messes with healthy ecosystems. And Wildlife Services kills wildlife now (and proposes to keep killing them) are cruel and unethical. I don't want my tax dollars being used to kill wildlife.

I am especially concerned about California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. California now has at least seven wolf packs with 50 or more wolves, inhabiting locations in the state including Lassen, Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to focus on protecting native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
James Jordan
CA 95616-6689

Info CaliforniaWDM

From: jajordanjr@everyactioncustom.com on behalf of James Jordan
<jajordanjr@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:28 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

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It's time for Wildlife Services to focus on protecting native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
James Jordan
CA 95616-6689

Info CaliforniaWDM

From: robert.zdenek@everyactioncustom.com on behalf of Bob Zdenek
<robert.zdenek@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:26 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Please protect wolves and other species.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bob Zdenek
CA 93401-6803

Info CaliforniaWDM

From: robert.zdenek@everyactioncustom.com on behalf of Bob Zdenek
<robert.zdenek@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:26 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

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Sincerely,
Bob Zdenek
CA 93401-6803

Info CaliforniaWDM

From: cbrown724@everyactioncustom.com on behalf of Catherine Brown <cbrown724@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:26 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. The California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Catherine Brown
CA 91748-4442

Info CaliforniaWDM

From: cbrown724@everyactioncustom.com on behalf of Catherine Brown <cbrown724@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:26 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. The California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Catherine Brown
CA 91748-4442

Info CaliforniaWDM

From: s_j_mccarthy@everyactioncustom.com on behalf of S.J. McCarthy
<s_j_mccarthy@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:25 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. Many of the methods Wildlife Services now uses are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals. I don't want anyone's tax dollars being used to kill wildlife.

I also ask Wildlife Services to take a closer look at how its program could hurt California's endangered wolf population. As the ESA requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
S.J. McCarthy
CA 94112-2416

Info CaliforniaWDM

From: n2caves@everyactioncustom.com on behalf of Gregg Oelker
<n2caves@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:25 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. There are other ways to protect cows and sheep. Rancher's solution should not just be killing.

Sincerely,
Gregg Oelker
CA 91001-4109

Info CaliforniaWDM

From: brandypear@everyactioncustom.com on behalf of Brandy Pearson
<brandypear@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:22 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I'm a mechanical engineer and am concerned about the dramatic losses described below that seem completely unnecessary.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Brandy Pearson
CA 92618-1136

Info CaliforniaWDM

From: unojodelacara@everyactioncustom.com on behalf of singgih tan
<unojodelacara@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:21 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Wildlife Services must do its public duty to protect native wildlife, not act at the command of the livestock industry. We do not want our tax money being spent to promote the interest of private industry, especially at the cost of exacerbating damage to the functioning of ecosystems and biodiversity loss. Please adopt Alternative 2 or 3.

Sincerely,
singgih tan
CA 95123

Info CaliforniaWDM

From: dperry2@everyactioncustom.com on behalf of David Perry <dperry2@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:20 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

IMMEDIATELY ADOPT ALTERNATIVE 2 OR 3 OF THE DAMN DISASTROUS WILDLIFE SERVICES PROGRAM FOREVER!

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
David Perry
CA 94306-3608

Info CaliforniaWDM

From: walkercreations@everyactioncustom.com on behalf of David Walker
<walkercreations@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:19 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

STOP KILLING INNOCENT WILDLIFE for the benefit of the GODDAMN LIVESTOCK INDUSTRY!!

I strongly, adamantly, and urgently demand that Wildlife Services adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife!!

I also insist that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

Again, to reiterate, it's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. As such, I strongly support the adoption of Alternative 2 or 3.

Sincerely,
David Walker
CA 93105-2662

Info CaliforniaWDM

From: wadetregaskis@everyactioncustom.com on behalf of Wade Tregaskis
<wadetregaskis@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:17 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please pursue preventative and relatively harmless (to wildlife) techniques for protecting people and livestock. This is not a new idea; there is a wealth of knowledge on this topic out there, regarding what methods work best in various scenarios. Killing animals for their natural behaviour does not mean the animals did something wrong, it means that humans have screwed up.

Sincerely,
Wade Tregaskis
CA 94062-4534

Info CaliforniaWDM

From: c_freeland@everyactioncustom.com on behalf of Clint Freeland
<c_freeland@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:16 PM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Clint Freeland
CA 93455-2044

Info CaliforniaWDM

From: weebesall@everyactioncustom.com on behalf of Melissa Miller
<weebesall@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:13 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

And since other species do not belong to humans at all, the least we can do is assiduously try to protect them as much as possible, after all the harm people have inflicted on them.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Melissa Miller
CA 91790

Info CaliforniaWDM

From: jim@everyactioncustom.com on behalf of Jim Franzi <jim@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:12 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091) They are all part of the system

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jim Franzi
CA 95629-9707

Info CaliforniaWDM

From: inherimage@everyactioncustom.com on behalf of Deborah Tash
<inherimage@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:12 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Important, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems, such as the climate benefits and wild fire deterrence of beavers. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Deborah Tash
CA 94114-2862

Info CaliforniaWDM

From: Sqrrlady@everyactioncustom.com on behalf of norma campbell
<Sqrrlady@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:10 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science.

That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack.

California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

The livestock industry does not run this State, the People of California do.

It's time for Wildlife Services to stop working for the livestock industry and protect native wildlife. Adopt Alternative 2 or 3.

Sincerely,
norma campbell
CA 95008-2424

Info CaliforniaWDM

From: LeonVanSteen@everyactioncustom.com on behalf of Leon Van Steen
<LeonVanSteen@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:09 PM
To: Info CaliforniaWDM
Subject: Protect All of California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue to kill wildlife. With these better alternatives no tax dollars would go toward killing wildlife for the benefit of the livestock industry -- that's NOT the purpose nor function of Wildlife Services. Additionally, these better alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep; alternatives that actually help Wildlife!

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results supporting wildlife.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems; additionally, many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For a healthy environment we need wildlife and protecting and ensuring the existence of wildlife is a long-term endeavor where short-term, profit minded killing of wildlife should play no part.

Specifically I request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to this state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties. (Praise be to God there's been some recovery in this area.)

It's time for Wildlife Services to stop working at the behest of the livestock industry and business profit and focus on sound environmental management and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Leon Van Steen
CA 94134-1910

Info CaliforniaWDM

From: jgreens14@everyactioncustom.com on behalf of Jesse Greenspan <jgreens14@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:09 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife

Dear APHIS-2020-0091 Wildlife Services,

As a California resident, I'm writing in opposition to Wildlife Service's mass killing campaign of wildlife in both my state and beyond. I consider it shameful that, at the behest of the livestock industry, the federal government kills tens of thousands of coyotes, bears, wolves, mountain lions, and other predators every year. Wildlife Services, if it must exist at all, should instead be focusing on nonlethal approaches to protecting livestock and only killing as an absolute last resort. As of now, it appears Wildlife Services mostly shoots first and asks questions later, and that it ignores the latest science. Its use of things like snare traps and poisons poses not only a danger to wildlife, but also to people and pets (which have been harmed in the past by Wildlife Service's methods).

Please reform Wildlife Services so that it lives up to its name. Because, right now, given its hostility to wild animals, the name "Wildlife Services" is a cynical euphemism straight out of Orwell. "Livestock Services," or perhaps the "Rancher Welfare Department," would be more appropriate.

Thanks for the time.

Sincerely,
Jesse Greenspan
CA 94705-1913

Info CaliforniaWDM

From: sjding@everyactioncustom.com on behalf of Sejon Ding
<sjding@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:08 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Killing seems to be the easy way out all the time. Imagine a more natural world where killing buy The Wildlife Services is the absolute last resort. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sejon Ding
CA 90064-2109

Info CaliforniaWDM

From: jujem@everyactioncustom.com on behalf of Jerrilyn Miller
<jujem@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:08 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I IMPORE Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, OUTDATED consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

PLEASE stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jerrilyn Miller
CA 91607-1512

Info CaliforniaWDM

From: lonnajean@everyactioncustom.com on behalf of lonna richmond
<lonnajean@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:07 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Honestly, you should really change your name to Wildlife Killing Services, which seems to be more of what your agency does.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Stop the biased resolutions that always result in killing wildlife and supporting livestock. My suggestion is to stop eating meat and retire all the cows.

Sincerely,
lonna richmond
CA 94965-9754

Info CaliforniaWDM

From: dbrenum@everyactioncustom.com on behalf of Diane Brenum
<dbrenum@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:07 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. Many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's - and especially my - tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

As a person of faith, I pray you will use your authority to protect Creation rather than prioritizing the livestock industry. We need to improve the health of our environment instead of harming it.

Thank you for your time and consideration of these requests.

Sincerely,
Diane Brenum
CA 94602-2435

Info CaliforniaWDM

From: spoodles308@everyactioncustom.com on behalf of Kathleen Taft <spoodles308@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:07 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

This is an issue that is of vital importance to me. Scientific research has proven the need for a much more balanced, humane approach to living with our wildlife. I hope Wildlife Services will evolve its understanding and methods accordingly.

Sincerely,
Kathleen Taft
CA 94925-2051

Info CaliforniaWDM

From: honmgret@everyactioncustom.com on behalf of Martha Goldin
<honmgret@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:05 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Wildlife, not industry, needs protection. There are methods for preventing clashes between wildlife and livestock. Adopt these alternatives. Do not permit killing what is essential for climate/environmental balance.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Martha Goldin
CA 94118-3912

Info CaliforniaWDM

From: pfol1029@everyactioncustom.com on behalf of P Foley <pfol1029@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Let's figure out a way to live together in harmony. Please stop killing BEAVERS! REALLY! We need wolves and other wildlife. Killing them at this rate imbalances the ecosystem. All things in moderation, please. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
P Foley
CA 93105-2662

Info CaliforniaWDM

From: babarhb0@everyactioncustom.com on behalf of Heather Brophy <babarhb0@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:03 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

WTF, WE PAY YOU TO PROTECT, GOT IT, NOW DO IT!! I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Heather Brophy
CA 93109-1313

Info CaliforniaWDM

From: JanetMatula@everyactioncustom.com on behalf of Janet Matula
<JanetMatula@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:03 PM
To: Info CaliforniaWDM
Subject: HELP California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Janet Matula
CA 92014-3122

Info CaliforniaWDM

From: dorota_damato@everyactioncustom.com on behalf of Dorota Damato
<dorota_damato@everyactioncustom.com>
Sent: Monday, March 4, 2024 12:01 PM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I respectfully urge Wildlife Services to adopt alternatives in its environmental analysis rather than the proposed plan to continue killing wildlife.

These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it acts according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters.

I also respectfully request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves.

Thank you!

Sincerely,
Dorota Damato
CA 95032-7348

Info CaliforniaWDM

From: 587njw@everyactioncustom.com on behalf of Norma Wallace
<587njw@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:59 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

The US has tried to kill its way to success.

IT IS NOT WORKING. I became an animal rights activist BECAUSE OF this Wildlife Services Killing Program.

Of all colonizer projects, this is one of the most appalling, based not on science but on cattle profits.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Norma Wallace
CA 94801-3847

Info CaliforniaWDM

From: sarahorourke007@everyactioncustom.com on behalf of Sarah ORourke
<sarahorourke007@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:59 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife and our future generations (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I feel like we treat wildlife as if it somehow is not connected to our own food sources. The more we care for wildlife, the better our food sources will be, and so using fatal or extermination processes ensures that the food our livestock eats is lower quality. Therefore, our lives will likely suffer over time, too, no matter how slowly the impact is felt. That is why I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sarah ORourke
CA 92122

Info CaliforniaWDM

From: leavmeb@everyactioncustom.com on behalf of Anne P
<leavmeb@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:58 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. They are LEASING public lands for private gain and are fully aware of possible losses. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Anne P
CA 95916-9631

Info CaliforniaWDM

From: msimply3@everyactioncustom.com on behalf of Melissa Waters <msimply3@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:58 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Please stop being the Wildlife Killing Service and start protecting our native wildlife!

Sincerely,
Melissa Waters
CA 92677-1447

Info CaliforniaWDM

From: rmuzzin@everyactioncustom.com on behalf of Ruth Stoner Muzzin
<rmuzzin@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:57 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop using everyone's taxpayer dollars to work only at the behest of and for the supposed benefit the livestock industry. It's time for Wildlife Services to use its powers to protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Thank you for your consideration of my comments.

Sincerely,
Ruth Stoner Muzzin
CA 94037-0761

Info CaliforniaWDM

From: howard@everyactioncustom.com on behalf of Howard Cohen
<howard@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:57 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed, cruel, and anti-ecological plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry. Or to remove all private cattle operations from public lands, an even better alternative.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply the mindless and barbaric killing of wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Howard Cohen
CA 94306-3004

Info CaliforniaWDM

From: jstein817@everyactioncustom.com on behalf of Julie Stein <jstein817@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:57 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am writing to urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of which were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Julie Stein
CA 91331-5040

Info CaliforniaWDM

From: smonsarrat@everyactioncustom.com on behalf of Sean Monsarrat
<smonsarrat@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:56 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It is long past time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. Again, I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sean Monsarrat
CA 95959-3434

Info CaliforniaWDM

From: michaelgterry@everyactioncustom.com on behalf of Michael Terry
<michaelgterry@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:56 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want any of our tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Michael Terry
CA 90402-1115

Info CaliforniaWDM

From: lea@everyactioncustom.com on behalf of Lea park <lea@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:55 AM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Lea park
CA 92618-4310

Info CaliforniaWDM

From: s.wilber@everyactioncustom.com on behalf of Stewart Wilber
<s.wilber@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:55 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Stewart Wilber
CA 94114-1710

Info CaliforniaWDM

From: bildeen@everyactioncustom.com on behalf of Bill Lundeen
<bildeen@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:55 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to STOP WORKING AT THE BEHEST OF THE LIVESTOCK INDUSTRY and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Bill Lundeen
CA 95437-9542

Info CaliforniaWDM

From: hollypapercuts@everyactioncustom.com on behalf of holly peters
<hollypapercuts@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:55 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please adopt Alternative 2 or 3 in your environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods to address conflicts with between the overpopulation of humans and the dwindling habitats of wildlife. For example, assist and subsidize livestock operators fencing and motion-sensing lights to deter predators from approaching cattle or sheep.

Since Wildlife Services is a Federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it is essential that the best available current science is followed. Science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

We all are impoverished when rich biodiversity does not exist. Many of the methods Wildlife Services uses (and proposes to keep using) are unethical and inhumane—methods include cruel gear like body-gripping traps and neck snares, fumigants released into dens and burrows, and aerial gunning of animals (shame on us.) For these reasons, I do not support the use of tax dollars to be used to kill wildlife.

I also ask that Wildlife Services take a closer look at how its program hurts California's endangered wolf population. The federal Endangered Species Act requires, Wildlife Services to consult with the U.S. Fish and Wildlife Service and commit to preventing harm to our vulnerable wolves.

Services can NOT rely on previous and outdated consultation when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

The Wildlife Services morally shall not work at the behest of the livestock industry. PLEASE protect native wildlife. I support the adoption of Alternative 2 or 3.

Sincerely,
holly peters
CA 94564-0061

Info CaliforniaWDM

From: Hollyd1225@everyactioncustom.com on behalf of Holly Dowling <Hollyd1225@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:53 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I care about our wildlife, especially our endangered wolves. I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Holly Dowling
CA 94947-3624

Info CaliforniaWDM

From: bschlau@everyactioncustom.com on behalf of Benjamin Schlau
<bschlau@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:53 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As keystone species, wolves are important checks on the trophic interactions and improve the overall health of their habitats.

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Benjamin Schlau
CA 90026-2306

Info CaliforniaWDM

From: plimsoul89@everyactioncustom.com on behalf of Sylvia Seymour <plimsoul89@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:53 AM
To: Info CaliforniaWDM
Subject: Please protect California's wildlife! (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sylvia Seymour
CA 95945-4612

Info CaliforniaWDM

From: christinehagelin@everyactioncustom.com on behalf of Christine Hagelin
<christinehagelin@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:53 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. Use the science behind the role of the apex species maintaining a balanced ecosystem.

Sincerely,
Christine Hagelin
CA 94595-3061

Info CaliforniaWDM

From: anillopedro@everyactioncustom.com on behalf of PETER ring-revotskie
<anillopedro@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:52 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

You are MURDERERS! All of you who are complicit belong in Prison, along the actual MURDERERS! All below are Not my words! You Horrible beings are Must be punished for your crimes...in .PRISON! I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
PETER ring-revotskie
CA 94901-4417

Info CaliforniaWDM

From: composerx@everyactioncustom.com on behalf of Pat Doherty
<composerx@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:52 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a long time volunteer for the USFS , I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. The reintroduction of wolves to yellowstone completely revitalized every aspect of the park including both flora and fauna and even the health of the river . It is essential to work for the best of nature and to stop working at the behest of the livestock industry .

Sincerely,
Pat Doherty
CA 92223-4124

Info CaliforniaWDM

From: l4metha@everyactioncustom.com on behalf of Françoise May
<l4metha@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:52 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

The wildlife services seem to protect special interests and greed rather than protecting endangered species ! All done with my tax dollars!! It has to stop it is a SHAME for all of us to allow these practices to go on!!!!

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Françoise May
CA 92264-4966

Info CaliforniaWDM

From: ceh41845@everyactioncustom.com on behalf of Christopher Hamilton <ceh41845@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:51 AM
To: Info CaliforniaWDM
Subject: Please Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I am an avid hiker, lover of the outdoors, and once-a-year backpacker—even though I'm almost 80 years old. I just wish that I could see more wildlife out there. Humans have thoughtlessly allowed many populations to diminish so greatly that when I venture out, I see fewer birds and wild animals than I did when I was younger.

I am so pleased to see that some of the persecuted carnivores are beginning to re-populate the spaces they once occupied. For example, we now see several wolf packs establishing themselves in California, the legacy of the venturous OR-7.

In order to protect as much wildlife as possible from unnecessary harassment, trapping, and death by terrible means, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Christopher Hamilton
CA 94706-2506

Info CaliforniaWDM

From: derek@everyactioncustom.com on behalf of Derek Cavasian
<derek@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:50 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. It is past time that we abandon the cruel destruction of native species at the behest of commercial interests when there are non-lethal alternatives. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Derek Cavasian
CA 94945-2716

Info CaliforniaWDM

From: cdzcat47@everyactioncustom.com on behalf of Charlene Zanella <cdzcat47@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:50 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I STRONGLY support the adoption of Alternative 2 or 3.

Sincerely,
Charlene Zanella
CA 95470-9424

Info CaliforniaWDM

From: stephmood@everyactioncustom.com on behalf of Stephanie Mood
<stephmood@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:48 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

WHY OH WHY DO YOU INSIST ON KILLING ANIMALS? THERE ARE MANY REASONS NOT TO PROTECT THE LIVESTOCK INDUSTRY WHICH IS DOING ITS OWN RAPING OF PLANET EARTH.

Thank you for any consideration of a species besides cruel humans.

Sincerely,
Stephanie Mood
CA 92107-2334

Info CaliforniaWDM

From: gia.mayorga@everyactioncustom.com on behalf of Giovanna Mayorga
<gia.mayorga@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:47 AM
To: Info CaliforniaWDM
Subject: Protect California's Wildlife (APHIS-2020-0091) NOW!

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Giovanna Mayorga
CA 90049-2110

Info CaliforniaWDM

From: snowpony25@everyactioncustom.com on behalf of Pam Decharo <snowpony25@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:47 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I STRONGLY urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Respectfully,

Pam Decharo
Palo Alto, Ca

Sincerely,
Pam Decharo
CA 94303-4827

Info CaliforniaWDM

From: Dsahhar@everyactioncustom.com on behalf of Dianna Sahhar
<Dsahhar@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:46 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Please do the right thing now, before it's too late!

Sincerely,
Dianna Sahhar
CA 92625-3400

Info CaliforniaWDM

From: azpuggles@everyactioncustom.com on behalf of Anne Corrigan
<azpuggles@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:45 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

It is your responsibility to protect our wildlife not kill them. Show some heart!

Sincerely,
Anne Corrigan
CA 92104-5747

Info CaliforniaWDM

From: swimmersullivan@everyactioncustom.com on behalf of michael sullivan
<swimmersullivan@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:43 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I strongly urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
michael sullivan
CA 94706-2102

Info CaliforniaWDM

From: nigel.jay@everyactioncustom.com on behalf of Nigel Jay
<nigel.jay@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:43 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

As a long time California resident, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

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I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Nigel Jay
CA 92614-7964

Info CaliforniaWDM

From: kate.brandt@everyactioncustom.com on behalf of Kate Brandt
<kate.brandt@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:43 AM
To: Info CaliforniaWDM
Subject: Stop killing California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Kate Brandt
CA 90027-1816

Info CaliforniaWDM

From: mahalligan1@everyactioncustom.com on behalf of Michele Halligan <mahalligan1@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:43 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

Since Wildlife Services is a federal program charged with managing, minimizing, and resolving conflicts between humans and wildlife, it's essential that it act according to the best available current science. That science concludes that nonlethal conflict-deterrence measures are most effective for long-term results and that simply killing wildlife can lead to even more conflicts.

Further, killing wildlife impoverishes the rich biodiversity needed for healthy ecosystems. And many of the methods Wildlife Services now uses (and proposes to keep using) are unethical and inhumane. Those methods include using cruel gear like body-gripping traps and neck snares, releasing fumigants into dens and burrows, and the aerial gunning of animals as they race terrified across the landscape under deafening airplanes and helicopters. For these reasons, I don't want anyone's tax dollars being used to kill wildlife.

I also request that Wildlife Services take a closer look at how its program could hurt California's endangered wolf population. As the federal Endangered Species Act requires, Wildlife Services must consult with the U.S. Fish and Wildlife Service and commit to measures to prevent or mitigate harm to the state's vulnerable wolves. It can't rely on previous, outdated consultation from when California had only six wolves, all of whom were members of California's sole wolf pack, the Lassen pack. California now has seven wolf packs and a total population of 45 to 50 wolves, inhabiting locations in the state far beyond where the Lassen pack ranges — including Modoc, Siskiyou, Tehama, Sierra, Nevada, and Tulare counties.

It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3. It's the right thing to do!

Sincerely,
Michele Halligan
CA 95003-4214

Info CaliforniaWDM

From: woofster46@everyactioncustom.com on behalf of Sandra Cutuli <woofster46@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:43 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

Please, please adopt Alternative 2 or Alternative 3 in your environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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Please stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Sandra Cutuli
CA 90035-4314

Info CaliforniaWDM

From: rosalbac@everyactioncustom.com on behalf of Rosalba Cofer
<rosalbac@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:42 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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Clearly, it's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Rosalba Cofer
CA 95632-2322

Info CaliforniaWDM

From: jillianspaak@everyactioncustom.com on behalf of Jillian Spaak
<jillianspaak@everyactioncustom.com>
Sent: Monday, March 4, 2024 11:41 AM
To: Info CaliforniaWDM
Subject: Protect California's wildlife (APHIS-2020-0091)

Dear APHIS-2020-0091 Wildlife Services,

PLEASE, I urge Wildlife Services to adopt Alternative 2 or Alternative 3 in its environmental analysis rather than the proposed plan to continue killing wildlife. These alternatives would help Wildlife Services focus on proven-effective nonlethal methods for addressing conflicts with wildlife — for example, helping livestock operators install fencing or motion-sensing lights to deter predators from approaching cattle or sheep. Importantly, with these alternatives, no tax dollars would go toward killing wildlife for the benefit of the livestock industry.

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It's time for Wildlife Services to stop working at the behest of the livestock industry and protect native wildlife. I strongly support the adoption of Alternative 2 or 3.

Sincerely,
Jillian Spaak
CA 90265-5003