

Decision and Finding of No Significant Impact

Wildlife Services' Gray Wolf Damage Management in Washington

United States Department of Agriculture, Animal and Plant Health Inspection Service

August 20, 2014

1. Introduction

The Washington Department of Fish and Wildlife (WDFW) requested the assistance of the United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (WS) with resolving gray wolf damage to livestock and possible human safety threats in accordance with WDFW's Wolf Conservation and Management Plan for Washington (WCMPW). The need for action is based on confirmed and chronic livestock depredation and, although less likely, the potential for wolves to threaten human safety. WS also evaluated similar actions for potential requests by Native American tribal governments on tribal lands in Washington. Finally, WS received requests from the United States Fish and Wildlife Service (USFWS) to assist with non-lethal depredation management and monitoring of federally protected wolves.

Wildlife Services closely coordinated with WDFW and USFWS to develop an Environmental Assessment (EA), entitled Wildlife Services' Gray Wolf Damage Management in Washington (December 2013). The EA presented an analysis of the potential effects of three alternatives. They were: 1) No Action, which means no change from the existing non-lethal only option WS WA currently employs (the term "no action" is a formal NEPA term and means no change from the status quo); 2) Eliminate the Current Wolf Assistance Program, which means that WS WA would provide no assistance to WDFW and USFWS; and 3) Expand the Current Wolf Assistance Program, which means that WS WA would conduct trapping and lethal control, in addition to non-lethal harassment and technical assistance based on explicit requests of WDFW and USFWS acting under their respective state and federal gray wolf management authorities (this is the Proposed Action Alternative). WS WA analyzed the effects of using an integrated wildlife damage management approach, which includes practical, humane, and effective non-lethal and lethal methods. Other alternatives were considered but were not assessed in detail in this EA because they did not meet the criteria necessary to reduce wolf damage in Washington and they were not options that Wildlife Services could realistically select. I have reviewed the December 2013 pre-decision EA and the public comments on the EA, and I have decided to issue a final EA to adopt the proposed action as described in the EA, and to issue this Finding of No Significant Impact (FONSI).

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

USFWS requested that WS WA be able to assist USFWS directly, as well as WDFW if USFWS asked for WDFW assistance, in managing federally protected wolves. While WDFW has the authority to authorize and conduct lethal control towards non-federally protected wolves, USFWS has not conducted formal environmental review to authorize/request lethal control of federally-protected wolves. WS WA's actions towards federally listed wolves would not include lethal removal of depredating wolves, but could include non-lethal deterrents, technical assistance, and live capture for conservation management. There are specific conditions where take of federally-protected wolves is authorized for reasons other than livestock depredation. As fully defined in the EA, these include provisions for the protection of persons from bodily harm, or for certain individuals to aid a sick, injured or orphaned gray wolf.

Federally recognized tribes in Washington have not made formal requests for WS WA wolf management assistance in Washington. Tribes in other states have requested WS WA assistance. Because wolf populations and potential depredations are expected to increase in Washington, WS WA analyzed this potential in the EA. On tribal lands, WS WA may take similar actions (as WS WA would when assisting WDFW) to assist tribal governments with wolf management, including using non-lethal and lethal control actions, as directed by tribes and under guidance similar to the WCMPW. As sovereign nations, tribes are not formally bound to ESA or state requirements. Although unlikely, tribes could choose to completely eliminate wolves from their sovereign land for any reason. Such an action would be unlikely to meet state wolf conservation goals, as identified in the WCMPW. As such, WS WA has determined that it would only implement wolf damage management on tribal lands (and at the request of the Tribe) under guidance that is similar to the WCMPW. If the Tribe does not have such guidance, WS WA would act in accordance with the intent of the WCMPW.

Purpose and Need

The purpose (Section 1.1 of the EA) of the EA is to reduce livestock depredation by gray wolves in Washington, as outlined in the WCMPW, where wolves are managed only by the state; assist USFWS reduce livestock depredation and with non-lethal wolf management in accordance with Code of Federal Regulations and ESA where wolves are federally managed; and to assist sovereign Native American Tribes on tribal reservation lands with wolf damage management if a need and request should arise. Additionally, the purpose of the EA is to be available to assist WDFW, USFWS, and sovereign tribal governments in the unlikely event that wolves threatened human safety.

The EA presents the nature of wolf damages and threats that are occurring and could occur in Washington. In 2011, the State of Washington adopted its WCMPW, which outlines specific objectives for meeting the state's wolf conservation and management goals. Any actions involving state managed wolves would need to conform to the state management plan. The State

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

issued a letter to WS WA stating that the State has the authority to remove chronically depredating wolves in accordance with the WCMPW (Appendix A of the EA), and requested WS WA's assistance with lethal and non-lethal wolf damage management. The State lethally removed depredating wolves in 2012. Tribes also have sovereign authority to kill wolves on their lands at their discretion. Therefore, the status quo is that WDFW and tribes will and can conduct lethal removal when they determine it is appropriate. WDFW and tribes could use the same methods WS WA described in the EA. The decision to be made from this EA is not whether a wolf should or should not be taken (that decision is only allowed under WDFW or Tribal governments) or the results of that removal. The decision to be made in the EA is whether WS WA should assist when requested or decline to assist, letting each other agency/tribe conduct wolf damage management actions (lethal and non-lethal) on their own. The EA analyzed the effects of WS WA taking the same or fewer actions than what WDFW/tribes could, especially in regards to lethal removal.

2. New Information

New or updated information has been obtained since issuing the December 2013 Pre-Decision EA that warranted consideration/clarification in the decision:

The Pre-Decision EA incorporated the 1997 Final EIS on the national APHIS WS program and Record of Decision (EIS and ROD) by reference. Based on a review of all such specific references in the EA, WS WA determined that incorporation by reference was not necessary and updated and replaced information in Sections 1.8, 4.1.2, 4.3.2, and Appendix C. No substantive changes were made that would change the analysis. The changes were made to simplify access to the cited material for the reader. This EA does not rely on the EIS and ROD. WS' decision and actions regarding gray wolf damage management in Washington rely solely and exclusively on the decision document and record on this EA.

A commenter noted that WS WA did not show any consultation with the USFWS in regards to the proposed listing on wolverine (*Gulo gulo*). WS WA had conferred with USFWS but failed to include reference to it in the pre-decision document. At that time, USFWS found WS WA's determination (that our actions are not likely to jeopardize wolverine). However, on August 12, 2014, the USFWS announced that it was withdrawing its proposed listing of the wolverine. In reviewing the public comment on the wolverine, we noticed that we informed the reader we consulted with the USFWS on Canada lynx (*Lynx canadensis*), but had not included Canada lynx on the list of "may affect, not likely to adversely affect" species given in Section 4.3.2. of the EA.

WS WA received the final Biological Opinion (BiOp) from USFWS on July 21, 2014 based on a consultation we initiated on February 1, 2013. USFWS concurred with all of WS WA's

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

determinations except for grizzly bear. In the Biological Assessment developed for USFWS, WS WA determined its actions (all WS WA statewide actions) were “not likely to adversely affect” grizzly bear. After further dialogue with USFWS, WS WA agreed with a conclusion of “likely to adversely affect” and the USFWS issued an incidental take statement for one grizzly bear over the next 10 years. Because USFWS expects to request WS WA to assist with federally listed gray wolf conservation trapping, USFWS determined that 33 federally listed wolves could be harmed over the 10-year period. USFWS determined that WS WA’s actions from the proposed program are not likely to jeopardize the continued existence of Threatened or Endangered Species in Washington. WS WA updated and clarified the Threatened and Endangered Species information under Section 4.3.2 of the EA to simplify this information for the reader. Because most of this information was already included in the pre-decision EA and the results of the BO do not present substantive new information, the EA does not require supplement or recirculation of the EA for public review.

In December of 2013, WDFW provided their comments to the Federal Register FWS-HQ-ES-2013-0073 proposal for “Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife and Maintaining Protections for the Mexican Wolf (*Canis lupus baileyi*) by Listing It as Endangered.” WDFW’s comments explain WDFW’s determination that lethal removal of wolves may be necessary in order to achieve wolf recovery and conservation in Washington. The comments include:

Starting in 2013, \$1.5 million per biennium generated from a permanent increase to the cost of new and renewed personalized license plates is dedicated to wolf management in Washington. This new revenue stream will cover costs associated with monitoring the population of wolves in Washington, providing technical and financial support to livestock owners to prevent conflicts, compensating producers for unavoidable livestock losses, employing the use of lethal remedies to stop repeated chronic depredations when necessary (currently eastern third of Washington), facilitating extensive public involvement in management decisions, and extending outreach opportunities to a variety of those interested in as well as affected by wolves.

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

A critical component for successful wolf recovery is social acceptance. Acceptance is advanced when we have the ability to resolve chronic wolf-related livestock conflicts. Washington's Plan stresses the need for preventative, non-lethal measures...lethal removal of problem wolves may be necessary. Our inability to respond in a meaningful way would promote intolerance of wolves. The long-term impacts could be severe.

WS WA reviewed WDFW's comments in their entirety, which mirror some of those made in Appendix A of the Final EA. We did not incorporate this new information into the Final EA because it only further supported the letter WDFW wrote to WS WA (that WDFW is the responsible agency for determining/authorizing when, where, and how many wolves under state control would be killed after they were confirmed as having been involved in chronic livestock depredation. It also supported WDFW's statement that if WS WA did not assist, WDFW would take the action themselves (Appendix A of the EA).

There was minor inconsistency in the terms used in the pre-decision EA to describe Alternative 3, Expand the Current Wolf Assistance Program and actions under this alternative. Alternative 3 and its actions were referred to as the Proposed Alternative, Proposed Action Alternative, Proposed Action, and Preferred Alternative throughout the pre-decision document. In most cases it was discussed under the term "Proposed Action" or "Preferred Alternative". As such, the EA was edited to ensure that when referring to Alternative 3, the term Proposed Action Alternative was consistently used.

On March 8, 2014, WDFW released a statement noting that gray wolves established four new packs and expanded their territory in the state over the past year. Thirteen wolf packs, five successful breeding pairs, and at least 52 individual wolves were confirmed during their annual survey. This information supports the assertions in the EA, that the wolf population is expected to continue to increase and expand across the state. The report also highlighted WDFW's efforts to reduce wolf conflicts through proactive non-lethal measures, which are identified as a key step in the Wolf Conservation and Management Plan for Washington discussed throughout this EA. These include:

- 1) WDFW entered into 29 cooperative agreements with livestock producers who committed to taking proactive steps to avoid conflicts with wolves,
- 2) WDFW created a new 13-member Wildlife Conflict Section to work with individuals and communities to avoid conflicts with wolves, and
- 3) A new 9-member advisory group representing hunters, livestock producers, and conservation groups was established to recommend strategies for encouraging more livestock owners to enter into cooperative agreements, providing compensation for wolf-related losses, and other issues.

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

On March 17, 2014, WDFW released a statement notifying the public that a collared wolf was illegally shot in northeast Stevens County in early February (<http://wdfw.wa.gov/news/mar1714a/>). This may support agency comments about needing to increase public tolerance of wolves in order to conserve and recover the species in Washington, as discussed in the EA.

3. Issues

The following 4 issues were identified during the interagency and public involvement processes during the development of the EA, were determined to be important to the analysis, and were used to drive the environmental analysis and to compare the alternatives.

1. Impacts on wolf populations
2. Impacts on non-target species including pets, federally protected species, and direct and indirect effects on other wildlife.
3. Social considerations including perspectives on humaneness and animal welfare and aesthetic values.
4. Effectiveness

4. Decision and Rationale

WS WA considered three alternative courses of action which were developed based on the reasonable choices that could be made by Wildlife Services: (1) a No Action Alternative, which would provide a minimal level of non-lethal technical assistance already being conducted by WS WA, (2) to eliminate the current WS WA wolf assistance program, whereby WS WA would offer no assistance or information on wolf management, and (3), the Proposed Action Alternative, in which WS WA could assist the state with implementation of the WCMPW and USFWS and tribes as defined in the EA (see EA under Executive Summary - Actions Analyzed and Proposed Action (Sections 1.3 and 2.3). The three alternatives were analyzed in the EA against the 4 issues noted immediately above. Other alternatives were considered but rejected from detailed analysis for the reasons presented in the EA. The following is a summary of the effects of the three alternatives evaluated in detail in the EA.

Alternative 1: No Action Alternative (Section 4.1)

The No Action Alternative (Alternative 1) would continue the current WS WA non-lethal assistance program. It is a required NEPA alternative to address the status quo. The status quo is that WS WA currently provides a minimal level of technical assistance, identification of wolf damage, and could provide non-injurious harassment of non-federally-protected wolves. The status quo is also that WDFW would continue to implement its WCMPW (Appendix A of the EA, including lethal take of non-federally-

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

protected wolves, which it has already done) and the USFWS and tribes could implement wolf management at their discretion (including lethal take of any wolf on tribal lands). The Colville Tribe allows wolves to be killed on tribal lands. The No Action Alternative would result in no new or additional action taken by WS WA to assist the WDFW, USFWS, or tribes. WS WA does not regulate WDFW, USFWS, or tribes, so these agencies can continue act under their respective authorities. As analyzed under this alternative, WS WA did not find its actions would have a direct effect on wolf populations in Washington.

Under this alternative, WS WA would not remove wolves. The No Action Alternative cannot preclude WDFW and others taking actions to resolve wolf depredation using lethal means where authorized, which WDFW indicated it would do (Appendix A of the EA). Those with strong opinions on this aspect of wolf damage management or on humaneness would likely still have those opinions, because other parties could continue wolf removal. Similarly, though WS WA would not likely have any positive or negative effect on the ability of the public to potentially experience wolves in the wild, the public may still experience those effects due to the actions of other entities like WDFW. WS WA would also have a no effect on non-target animals or human safety under this alternative, though other entities might.

The No Action Alternative was found to have some of the same effects as the Proposed Action Alternative because if Wildlife Services does not adopt the Proposed Action Alternative, non-lethal and lethal wolf management actions would be implemented by the State of Washington, or its agents, as has been demonstrated and discussed in the EA, under the same strict guidelines as allowed in the WCMPW (Wiles et al. 2011). It is also likely that USFWS and tribal governments would similarly implement the same actions to manage wolf conflicts. WDFW indicated that without the assistance of the WS WA program, the likely result would be increased livestock losses, and WDFW's overall wolf conservation efforts in Washington would be challenged. The No Action Alternative was not selected because WDFW has indicated that although it would implement the plan, without additional assistance from WS, service to landowners may be reduced or delayed, thus wolf depredation on livestock may increase (EA 4.1.1, 4.3.1, and Appendix A). Also, the No Action Alternative would not fulfill WS WA's legislative authority to use its expertise to assist the State of Washington or the livestock producers with managing wolf damage to livestock. The No Action Alternative would not meet the purpose and need as discussed throughout the EA.

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

Alternative 2: Eliminate the Current Wolf Assistance Program (Section 4.2)

Under Alternative 2, the Eliminate the Current Wolf Assistance Program Alternative, WS WA would have no involvement or effect with/on wolves. WS WA would not provide any wolf assistance to WDFW, USFWS, other public agencies, tribes, or private individuals within Washington. WS WA would not distribute available equipment or assist landowners with the implementation and use of non-lethal methods and devices. WS WA would not investigate wolf depredation complaints to determine if the wolves are responsible for losses. WS WA would not assist WDFW, USFWS, or tribes with capturing wolves for radio-collaring for monitoring purposes and/or to enhance effectiveness of non-lethal deterrents such as the RAG devices. WDFW would make the final determinations for investigations under their jurisdiction and conduct lethal removal as warranted. The tribes could continue to manage all wolves on their lands however they chose to. USFWS would continue to manage federally-protected wolves and would ask WDFW for assistance, as appropriate.

The cumulative effects on wolves would be similar to that described under Section 4.1.1. WDFW, USFWS, or tribes would implement wolf damage management per appropriate regulations, as discussed in Section 2.1, and individual wolves are expected to be removed when and where a need exists and in accord with the requirements for removal. In addition, producers in areas where wolves are managed by the state (currently within the NRMDPS boundary), and who have been issued a WDFW permit or catch wolves attacking their animals (WAC 232-36-05100B), may kill wolves.

WS WA would have no effect on non-target species or humans under this alternative. WS WA would have no effect on human safety under this alternative. Lethal methods would/could be used by WDFW, its agents, or tribes in the absence of any assistance from WS WA, and thus would present no change in human safety risk from that of the current environmental baseline (the No Action alternative).

The effects of this alternative would be similar to the No Action alternative because of WDFW would implement the WCMPW, which allows for nonlethal and lethal control. Under this alternative, WS WA would have no effect on the ability of the public to enjoy wolves since it would have no effect on individual wolves or the wolf population. WDFW and tribes could take necessary lethal actions and wolves would be affected similar to the No Action alternative.

Eliminating all assistance from WS WA would necessitate WDFW, USFWS, or tribes to direct personnel away from proactive damage management and conservation and

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

recovery efforts, which would likely negatively affect wolf conservation and recovery and may result in increased wolf depredation on livestock (Appendix A). This alternative would likely have similar or negative effects (relative to the No Action Alternative) to the wolf population in Washington because WS WA could not provide professional advice or assistance to anyone looking for ways to reduce wolf-livestock conflicts. This Alternative was not selected because WDFW has indicated that although it would implement the plan, without additional assistance from WS, service to landowners may be reduced or delayed, thus wolf depredation on livestock may increase (EA 4.1.1, 4.3.1, and Appendix A). Also, this Alternative would not fulfill WS WA's legislative authority to use its expertise to assist the State of Washington or the livestock producers with managing wolf damage to livestock. This Alternative would not meet the purpose and need as discussed throughout the EA.

Alternative 3: (Proposed Action Alternative) Expand the Current Wolf Assistance Program (Section 4.3)

Under the Proposed Action Alternative, WS WA would conduct a fully integrated approach to wolf damage management, as requested by WDFW, USFWS, or tribes under the guidance of the WCMPW, Code of Federal Regulations (CFR), or similar guidance. WS WA would not at any time make the decision on whether or how many wolves would be lethally removed. WDFW would maintain responsibility for making the final determinations on when removal is warranted for federally delisted wolves, USFWS would retain management of federally listed wolves, and tribes would maintain management of wolves on tribal lands. WS WA wolf damage management on tribal lands would mirror procedures and restrictions on non-tribal lands, with the exception that tribal wildlife managers or WS WA may confirm wolf damages.

Pursuant to WS policy, WS WA would only provide direct wolf damage management on properties after *Agreement for Control* or other work authorization documents have been completed. On federal public lands, planned activities must be included in work plans developed in coordination with each National Forest or BLM Resource Area. In emergency, unplanned situations, activities on federal public lands would be conducted in consultation with the respective USFS or BLM office. On tribal reservation lands, WS WA wolf damage management would only be conducted at the request of the tribe and in accordance with individual agreements with each sovereign tribal government.

The direct and indirect effects on the wolf population in Washington are similar to Alternative 1. Effects on the wolf population under this alternative could result in a similar or lower level of wolf removal as compared with Alternatives 1 and 2 (see section 4.3.1 of the EA). WS WA could respond to WDFW or tribal requests to remove

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

depredating wolves under the conditions of the WCMPW or similar guidance and assist USFWS with wolf conservation efforts under ESA guidelines. This alternative would allow WDFW, USFWS, and tribal personnel to focus their efforts on conservation and recovery of gray wolves in Washington. It would not result in more wolves removed since WDFW and tribes are responsible for determining the number of depredating wolves to remove. WDFW is already implementing its WCMPW (and removing wolves that chronically depredate livestock) and would continue to respond to wolf damage complaints in the absence of WS WA assistance (Appendix A). The analysis in the EA indicates that the cumulative effect on the gray wolf population in Washington would be similar or lower than Alternatives One and Two. There would be little to no difference under the Proposed Action Alternative in the effect to non-target animals because WDFW, its agents, USFWS, WS WA, and tribes could use the same tools. The USFWS has determined that the Proposed Action Alternative is not likely to adversely affect bull trout, Canada lynx, Columbian white-tailed deer, pygmy rabbit and would not jeopardize the wolverine (wolverine was subsequently removed from the list of proposed species). When targeting federally-protected gray wolves for live capture (at the request of USFWS or WDFW), the Proposed Action Alternative may likely adversely affect individual gray wolves, but the long-term effect to the population is expected to be positive. Grizzly bear (*Ursus arctos horribilis*) may be adversely affected if one was captured during wolf trapping efforts. The Proposed Action Alternative will not jeopardize the continued existence of the gray wolf or the grizzly bear (see section 4.3.2 of the EA). While some people are opposed to the capture and killing of wolves for any reason, the best available methods will be used to minimize pain and suffering and similar methods are already being used by WDFW.

The effectiveness of the tools and techniques proposed under this alternative would be similar to the No Action or Non-lethal Only alternatives since either way, non-lethal methods will be in use when they are effective, and agency lethal control would take place using the same approach as provided by WDFW's WCMPW (Wiles et al. 2011), CFR/ESA guidelines, or under tribal authority. However, the Proposed Action Alternative would likely be more efficient in reducing depredation than either of the other two alternatives.

WS WA reviewed WDFW's October 25, 2012 letter to WS WA (EA Appendix A), which states that without the assistance of WS WA [as discussed in this EA], its own wolf-livestock conflict management efforts may be delayed due to other commitments and responsibilities, which would have the effect of decreasing public tolerance for wolves and jeopardizing wolf recovery. WS WA may be more efficient in responding to reports of wolf-livestock conflicts and WDFW orders to remove depredating wolves - potentially reducing further livestock losses because it has agents in the field assisting

landowners with other wildlife damage conflicts, and these agents may be more readily available. Because WS WA would only remove wolves that WDFW, USFWS, or tribes authorized the removal of, WS WA would not remove more wolves than those organizations. As such, there would be at least the same number of wolves available for the public to view if WS WA were to take the action instead of WDFW, USFWS, or tribes. The proposed action is expected to have a low impact and intensity. It is not likely to affect the general public's long term visual enjoyment of wolves in their natural habitats, although it may temporarily limit their opportunity given that new wolves would most likely reoccupy the site in the future if suitable habitat exists.

No significant environmental effects were identified.

5. Public Involvement

Public participation in the National Environmental Policy Act (NEPA) process for the EA was conducted consistent with Wildlife Service's NEPA procedures. Scoping and the public process had four major components (three occurred prior to public outreach):

Prior to public outreach:

- 1) WS WA reviewed the WDFW FEIS and WCMPW for any relevant issues. WS WA was also a contributor to the WCMPW, so relevant information was easily accessible;
- 2) WS WA held interdisciplinary meetings with USFWS and WDFW after WCMPW adoption by the WDFW;
- 3) WS WA submitted a *Deliberative Agency Draft for Gray Wolf Damage Management in Washington* to the Washington Department of Natural Resources, Washington Department of Agriculture, WDFW, United States Forest Service, and USFWS. All agency comments were considered in the development of the pre-decision EA.

WA's public outreach process included direct mailing notices to potentially interested parties and tribes, posting a notice and the pre-decision EA on the APHIS-Wildlife Services website (http://www.aphis.usda.gov/wildlife_damage/nepa.shtml) and <http://www.regulations.gov/#!docketDetail;D=APHIS-2013-0107>, and publishing legal notices in The Olympian newspaper announcing the availability of the pre-decision EA for comment. Wildlife Services received 44 public comment letters (some of which included attachments providing additional comment) and considered all comments. A summary of the public comments and responses is contained in Appendix D of the Final EA. Notices of the availability of this decision will be placed in the same newspaper (The Olympian) that announced the availability of the Pre-Decision EA. This decision document will also be posted on the Wildlife

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

Services website (http://www.aphis.usda.gov/wildlife_damage/nepa.shtml) and at <http://www.regulations.gov/#!docketDetail;D=APHIS-2013-0107>.

I have reviewed the December 2013 Pre-Decision EA and the public comments on the EA. I have decided to issue this Final EA, reflecting minor changes and updates as described in this decision document, adopt the Proposed Action Alternative as described in the EA, and to issue this Finding of No Significant Impact (FONSI).

FINDING OF NO SIGNIFICANT IMPACT

The analysis in the EA indicates that Alternative 3, the Proposed Action Alternative, does not constitute a major federal action significantly affecting, individually or cumulatively, the quality of the human environment. I agree with this conclusion and, therefore, determine that an Environmental Impact Statement (EIS) will not be prepared. This determination is based on consideration of the following factors:

1. The proposed activities would occur in limited areas of Washington at the request of WDFW, USFWS, or tribal authorities and in accordance with WDFW's Wolf Conservation and Management Plan for Washington (WCMPW), Code of Federal Regulations, or tribal guidance that is congruous with the WCMPW, respectively. The proposed activities are not national or regional in scope.
2. The proposed activities will not significantly affect public health and safety. The methods used to control wolves are target specific and are not likely to affect public health and safety.
3. The proposed activities will not have an impact on unique characteristics of the geographic area such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas. The nature of the methods proposed for removing chronic depredating wolves do not significantly affect the physical environment.
4. Although some people are opposed to some aspects of wolf management and/or removal, the methods and impacts are not highly controversial among agency researchers and experts. Lethal wolf damage management actions would be conducted by WDFW if WS WA did not assist. WDFW and the Tribes are responsible for confirming wolf depredation and for all decisions on lethal removal under their respective management authorities. Wolf management including lethal removal would continue under those processes if WS did not assist.
5. The possible effects of the proposed activities on the quality of the human environment are not highly uncertain and do not involve unique or unknown risks. WS WA reviewed the WCMPW and believes that the adaptive management strategy built into it would prevent any cumulative effects from jeopardizing the viability of the wolf population in Washington. WS WA will use similar adaptive management strategies and guidelines when working with tribes per tribal management authorities.

Decision and Finding of No Significant Impact
Wildlife Services' Gray Wolf Damage Management in Washington
United States Department of Agriculture, Animal and Plant Health Inspection Service

6. The proposed activities do not establish a precedent for actions with future significant effects or represent a decision in principle about a future consideration.
7. There are no significant cumulative effects identified by this assessment. All wolf damage management activities, including removal, will be at the request of and coordinated with WDFW, USFWS (nonlethal only), or tribes under their management authorities. WS WA activities will stay within WDFW's WCMPW or similar guidance for wolf damage management actions where gray wolves fall under the management jurisdiction of WDFW or tribes. Work under the direction of the USFWS for federally protected gray wolves is non-lethal in nature.
8. The proposed activities will not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause a loss or destruction of significant scientific, cultural, or historical resources. Wolf damage management does not have the potential to affect historic properties. Federally recognized tribes in Washington were contacted during the preparation of this EA and no issues of concern were identified.
9. The proposed activities will fully comply with the Endangered Species Act of 1973, as amended. The proposed activities would either have no effect, or are not likely to jeopardize federally listed threatened and endangered species. A Biological Opinion was issued for the proposed actions on July 21, 2014. All terms and conditions to minimize harm to threatened and endangered species were already included in the proposed action as Standard Operating Procedures.
10. There are no irreversible or irretrievable resource commitments identified by this assessment, except for a minor consumption of fossil fuels for routine operations.
11. The proposed activities will not threaten a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

For additional information concerning this decision, please contact Roger A. Woodruff, State Director, USDA-APHIS-Wildlife Services, 720 O'Leary St NW, Olympia, WA 98038.



Mike Bodenchuk
Acting Director, Western Region
USDA-APHIS-Wildlife Services
Fort Collins, Colorado

8/20/14
Date