

Talasi Brooks (ISB # 9712)  
Laurie Rule (ISB # 6863)  
ADVOCATES FOR THE WEST  
P.O. Box 1612  
Boise, Idaho 83701  
(208) 342-7024  
(208) 342-8286 (fax)  
tbrooks@advocateswest.org  
lrule@advocateswest.org

Kristin F. Ruether (ISB # 7914)  
WESTERN WATERSHEDS PROJECT  
P.O. Box 2863  
Boise, ID 83701  
(208) 440-1930 (phone)  
(208) 475-4702 (fax)  
kruether@westernwatersheds.org

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

WESTERN WATERSHEDS PROJECT,  
CENTER FOR BIOLOGICAL DIVERSITY,  
FRIENDS OF THE CLEARWATER,  
WILDEARTH GUARDIANS, and  
PREDATOR DEFENSE,

Plaintiffs,

v.

TODD GRIMM, Idaho Director,  
Wildlife Services, USDA WILDLIFE  
SERVICES,

Defendants.

No. 1:16-cv-218-EJL-CWD

**DECLARATION OF KENNETH COLE**

I, Kenneth Cole, declare as follows:

1. I am a resident of Boise, Idaho. The following facts are personally known to me, and if called as a witness I would and could truthfully testify to these facts.

**Personal Background**

2. I have a bachelor's degree in biology from Idaho State University.

3. I am the Idaho Director for Western Watersheds Project ("WWP"), and have been in my current position since January of 2015. I was previously the NEPA Coordinator for WWP, a position I held from August 2008 to December 2014. I am a member of WWP.

4. My duties for WWP include reviewing federal agency land and wildlife management proposals, submitting comments on behalf of WWP, and otherwise participating in the public comment process for federal agency land and wildlife management decisions across Idaho and in Nevada. I have commented on scores of agency decisions, and filed administrative protests and appeals for federal agency decisions issued in Idaho.

5. One essential element of my job is to conduct site visits to the public lands, during which I routinely observe the conditions of the uplands, riparian areas, and wildlife habitat. I take many photographs and keep a GPS record of my travels so that I know where I have been. I upload many of my photos onto Picasa, a photo-sharing website. I generally spend at least 30-40 days in the field during an average field season each year.

6. I am also an avid photographer. I regularly travel around the West to take photographs of the wildlife and scenery I observe. I particularly enjoy taking photographs of wildlife, native fish, and plants, which I often use to illustrate blog stories I write online. I often post my photos on-line where I can share them with my friends and family.

7. I am an active blogger and editor of The Wildlife News. This blog is one of the top ten most visited wildlife blogs in the west. My responsibilities include writing commentary on environmental issues affecting western lands and wildlife, grazing issues and stories concerning wildlife conservation.

8. I also love to recreate on public lands in my free time, for the purposes of finding peace and solitude, searching for, observing and photographing wildlife and their sign, howling for wolves and searching for tracks or other sign.

9. From 2000 to 2008, I worked for Idaho Department of Fish and Game (“IDFG”) as a fisheries technician. My responsibilities with IDFG included: (1) establishing a locally-adapted brood population of B-Run steelhead on a tributary of the Upper Salmon River; (2) processing Chinook salmon at salmon traps; collecting biological information and samples from salmon; setting tags and recovering tag information; conducting creel surveys at check stations; conducting redd counts; and operating smolt screw traps; and (3) conducting a fin-ray aging study for Snake River Chinook salmon, and extracting and reading coded wire tags from Chinook and steelhead.

#### **Background on Western Watersheds Project**

10. As a long-time member and employee of WWP, I know WWP’s staff and board and many of our members, particularly in Idaho.

11. WWP is an Idaho non-profit membership conservation group, which currently has offices or staff in Idaho, Arizona, Oregon, Wyoming, and Montana. The organization is recognized as an IRS 501(c)(3) charitable entity.

12. WWP currently has about 1500 dues-paying members, plus a larger group of volunteers and supporters, who are located in Idaho and around the United States. Our board,

staff, members, supporters, and volunteers include many highly-trained and experienced scientists, as well as a number of former federal and state agency employees.

13. Through the efforts of our board, staff, members, supporters, and volunteers, WWP is actively engaged in a range of issues regarding public lands and wildlife management in Idaho and other western states. Our board, staff, members, supporters, and volunteers spend countless hours touring, inspecting, studying and recreating on public lands in Idaho and other states; monitoring federal agency land management decisions; reviewing draft and final Environmental Impact Statements (EISs), Environmental Assessments (EAs), and other documents prepared by federal agencies to analyze and publicly disclose the environmental impacts of their proposed actions in Idaho and other states; providing factual, scientific and policy-based comments to federal agencies as part of the NEPA process; and publicizing and educating the public about federal land and wildlife management issues in Idaho and other states.

14. As part of my tasks as WWP's Idaho Director, I personally spend considerable time reviewing and commenting upon draft NEPA analyses (EISs, EAs, etc.) produced by federal agencies regarding proposed land and wildlife management activities in Idaho; and communicating with our members, supporters, volunteers and the general public about those studies, our comments, and potential impacts to the public lands and wildlife that we all cherish.

15. Having accurate, complete and timely disclosure under NEPA of proposed federal agency actions, reasonable alternatives to their proposed actions, and their potential environmental impacts is crucial for me to be able to do my job properly, and to the ability of WWP as an organization to pursue its mission and communicate with its members, supporters and the public.

16. Federal Defendant USDA APHIS Wildlife Services (“Wildlife Services”) is an agency or program within the Department of Agriculture that I have attempted to track and monitor for many years, because it undertakes a wide variety of wildlife-killing programs that I believe are often inhumane, indiscriminate, unnecessary, and cause significant adverse environmental impacts to wildlife populations and the ecology of the public lands where they reside. Yet Wildlife Services is notorious for conducting its wildlife-killing programs out of public view and without adequate public disclosure under NEPA.

17. Wildlife Services has carried out extensive wolf killing in Idaho since 1995-96, as I describe in more detail below, gunning down, trapping, or otherwise killing literally hundreds of wolves and destroying many well-known and beloved wolf packs. Yet Wildlife Services has never prepared any EIS in compliance with NEPA for its Idaho wolf killing activities, despite their substantial adverse impacts on the wolf populations and packs, on the ecological roles played by wolves as apex predators, and on people – like me and many other WWP members – who love wolves and are harmed by their killing at the hands of Wildlife Services.

18. It is difficult to find out information about Wildlife Services wolf killing programs. The agency does not post any information about when it kills wolves and where online, other than a year-end summary of how many wolves were killed, which comes in the spring of the following year. The way that I track how many wolves Wildlife Services kills is to review mortality records that I must obtain from IDFG via public record requests. This is an uncertain process because IDFG sometimes denies these requests, claiming that it cannot give WWP the information if we are involved in any litigation with IDFG.

19. Wildlife Services’ failure and refusal to publicly disclose and analyze its Idaho wolf killing activities through a NEPA-compliant EIS has directly injured my interests, and the

interests of WWP as an organization, in understanding, seeking to influence, and communicating with our members and the public about these highly controversial actions. Because Wildlife Services has repeatedly refused to prepare a NEPA-compliant EIS for its Idaho wolf killing activities, these harms and injuries can only be remedied by a court order requiring the agency to fulfill its NEPA duties through an EIS with respect to its Idaho wolf control actions.

### **Interest in and Experiences Viewing Wolves**

20. I have a particular love of wolves, and the condition of wolf populations has been a longstanding interest of mine. I enjoy seeing and photographing wolves and their sign in their natural environment and I particularly enjoy watching them in Idaho because I live here and have advocated for their presence for many years. I have been fortunate to see them in various areas of Idaho, Montana, and Wyoming.

21. My interest in wolf recovery started at a young age while accompanying my father on yearly trips to Yellowstone National Park during the late 1970's where we often discussed wildlife and the fact that wolves were absent from the Park. We participated in a survey that asked about our use of the Park and what improvements if any we thought should be made. I distinctly remember writing that we felt that wolves needed to be reintroduced to the Park.

22. The first experience that I had with a wolf was while I was stationed at the former USFS Landmark Ranger Station on Johnson Creek just west of the Frank Church Wilderness in 1992. Early one morning I was awakened by the howls of coyotes and what I think was a wolf in response. There had been several reports of wolves in the area during that time.

23. In subsequent years I followed news stories about the reintroduction of wolves to Central Idaho and Yellowstone National Park. In 1995 the first wolves were reintroduced in

front of cameras in Central Idaho and Yellowstone National Park. At that time I began searching for information about what was happening to the wolves and I discovered Ralph Maughan's Wolf News web page. Obtaining information and contributing to public understanding of wolves and the wolf reintroduction through that and other web sites has been an important part of my life since then. I have written many stories about wolves and wolf management for Ralph Maughan's blog, now known as the Wildlife News.

24. I first observed a wolf in the wild when I made a special trip to the National Elk Refuge in the winter of 1998/1999 and was able to watch 3 wolves hunting elk there. It was a profound experience for me because it had been a lifelong goal to see a wolf in the wild.

25. On several occasions since then I have taken special trips to observe wolves in Yellowstone National Park where I have been fortunate to observe wolves and provide opportunities to friends and family to view them as well.

26. In the spring of 2002, while working for IDFG, I was stationed at the East Fork Salmon River fish trap where I conducted surveys of fishermen on the Main Salmon River and helped operate a fish trap and pond on Squaw Creek, a tributary of the Main Salmon River near Clayton, Idaho. I was excited to be stationed there because I knew there was a wolf pack named the Whitehawk Pack that inhabited the area.

27. On the morning of April 6, 2002, I witnessed a Wildlife Services' spotter plane and helicopter in the process of gunning down the Whitehawk Pack because they had been implicated in livestock depredations. I was very disturbed by what I had seen. I was extremely disappointed that my chances of viewing a wolf had been severely diminished because all of the wolves that lived in this pack were killed.

28. It wasn't until the following spring of 2003 that I was able to observe and hear wolves in Idaho. On several occasions I was able to observe, track, and howl for wolves in the Squaw Creek Drainage. The experiences I had were the foundation for many efforts on my behalf to help protect the Buffalo Ridge Pack, which established a territory around the East Fork Salmon River area near Clayton, Idaho.

29. I was stationed nearby the Squaw Creek steelhead pond located near Clayton, Idaho for several months each spring from 2003 to 2007. On several occasions during my time there, I observed wolves from the Buffalo Ridge pack at the fish pond that I was charged with tending and I was able to show wolves to my father and my future wife while they were visiting me.

30. On several occasions I was able to howl to the wolves of this pack and have them respond. The first time I heard the wolves I was a short way up a road that climbs up to South Butte. I parked my car and turned off the lights and then howled. It was as if the whole canyon erupted in a chorus of howling wolves. I once howled to them while on a hike and the whole pack, including several very young pups howled to me from very nearby. On another occasion, I was able to film several wolves in the meadow next to Squaw Creek while they were playing. On yet another occasion, I howled for a wolf on a rainy night and the wolf approached me to within 20 yards. These were all very exciting experiences for me that I will always remember.

31. These wolves were also attracted to the fish pond that I attended. Each year at about the same time, we would lower the level of the pond to flush the steelhead smolts into Squaw Creek and into the Salmon River so they could migrate to the ocean. There was always a period of time where the water in the pond was very low and there were still thousands of steelhead smolts that were easy to catch. Because the bottom of the exposed pond was muddy



and wet, there were hundreds of perfectly formed wolf tracks, some of which I took the opportunity to cast in plaster. I have some of these casts hanging on the wall of my home and I have given many away as gifts to friends.

32. Because of my personal interest in wolves and my professional experience as a biologist, I have also participated in various wolf management efforts. For instance, in the spring of 2005 I helped with testing of turbo-fladry, a non-lethal technique to try and keep wolves away from livestock to prevent conflicts. As part of this testing, I was provided telemetry equipment to track the radio-collared Buffalo Ridge pack wolves and was able to observe these wolves from long distance.

33. In the spring of 2006, I helped agency personnel trap and collar a yearling male wolf from the Buffalo Ridge pack at the fish pond. This wolf was designated as wolf B270 and dispersed to an area north of Carey, Idaho. Wildlife Services killed it in the spring of 2007 near Picabo, Idaho, after it was implicated in the killing of livestock. It was killed with a female wolf that was lactating, so likely had pups that were orphaned by the killing and probably died. I was deeply saddened when I learned of this.

34. During the spring of 2006 I also encountered two wolves near the likely denning area of a new pack on the East Fork of the Salmon River, which was later known as the Castle Peak Pack. This was the same denning area of two previous packs, the White Cloud pack and the Whitehawk pack.

35. In the winter of 2007/2008, Wildlife Services killed eight members of the Buffalo Ridge pack near Clayton and the fish pond where I worked, after Wildlife Services implicated them for killing a calf. I was very upset when I learned about this because I had watched the pack for years and I was able to recognize at least three of the wolves. For example, one of them

had a limp. I felt it was a heavy-handed response to the loss of, what I was told was, a single calf. I was very sad that I would no longer be able to observe and enjoy these wolves, which I had been able to share with my family members.

36. I was stationed at the University of Idaho's Taylor Ranch in the Frank Church-River of No Return Wilderness during the fall of 2007 and spring of 2008 to manage an IDFG fish trap on Big Creek. During that time, I frequently hiked up and down Big Creek searching for wolf tracks and howling for wolves from the Golden Creek and Monumental Creek wolf packs, both of which occupy that part of the wilderness. During this period, I saw wolf tracks going up and down Big Creek and heard wolves howling in the area. On one occasion in the fall of 2007, I watched approximately five wolves from the Golden Creek wolf pack on a ridge near the Taylor Ranch. The experience of viewing and hearing wolves, and seeing signs of wolves, in this wilderness environment with little human influence is something I will never forget. Wolves made the area feel more wild and like a real wilderness.

37. After that experience, I was shocked to learn that IDFG eradicated the Golden Creek pack during the winter of 2013/2014. The loss of the Golden Creek pack greatly disappointed me and greatly diminished the wilderness characteristics of the Frank Church Wilderness. The loss of this pack also bothered me because it was the subject of one of the longest running studies of wolves and prey in the Frank Church-River of No Return Wilderness due to their proximity to the Taylor Ranch.

38. I have also viewed wolves in several other places throughout Idaho. In the summer of 2003 saw two wolves near Big Creek summit on the Warm Lake Highway. I saw five wolves from the Landmark pack just south of Landmark in the summer of 2005. They had just crossed Johnson Creek and two of the five wolves marked a tree and scratched the ground to

mark their territory. Two of these wolves were nearly pure white and the other two were gray in color.

39. On another occasion in 2003, two friends and I went to Bear Valley in central Idaho where I was able to howl back and forth with a wolf in Ayers Meadow for several minutes. Driving around late that night, we also saw a lone wolf walk across the road very close to the Idaho Fish and Game cabin near Elk Creek.

40. I also saw several wolves while I was on two separate tracking flights in 2007 with a wolf biologist from the Nez Perce Tribe. One group of about five wolves from the Blue Bunch pack was basking in the sun on a snowy ridge overlooking the Indian Valley in western Idaho. I saw another wolf, likely from the Lick Creek pack, walking along a ridge above Rapid River at the base of the Seven Devils Mountains.

41. Many of the wolves that I have seen over the years have been killed by Wildlife Services.

**Personal Knowledge of Wildlife Services' Wolf Killing in Idaho**

42. Because of both my job tracking livestock grazing actions in Idaho and my personal interest in Idaho's wild public lands and wildlife, I regularly visit areas where wolves are subject to persecution by Wildlife Services.

43. As noted above, I have spent extensive time in the East Fork of the Salmon River drainage. In addition to my work there for IDFG, WWP managed property there for years and I have attended many WWP meetings there, as well as taken many hikes and field visits. I visit this area nearly every year for field visits, and look for wolf sign. Wildlife Services has exterminated at least three packs in that drainage, the White Cloud pack, the Whitehawk pack, and the Castle Peak pack. These exterminations over the years have significantly reduced the

ability of wolves to establish in the East Fork drainage, making it more difficult for me to find wolves or their sign in this valley, and harming my deep personal and professional interests in wolf recovery and observing wolves here.

44. Another place I visit regularly for work and recreation is the Copper Basin area, meaning the area of the upper Big Lost River north and south of the Trail Creek Road. I have visited this area about six times since 2010 to inspect livestock grazing impacts, enjoy the beauty of the public lands, and search for wildlife. I intend to continue visiting regularly, including this summer.

45. For example, during October of 2015, I visited Copper Basin with several colleagues. On the first night, we camped in Muldoon Canyon and I howled for wolves but received no response. I was hopeful I might hear wolves since a friend had heard them in Copper Basin before.

46. During that visit, my colleagues and I hiked up Cabin Creek, a tributary to East Fork Big Lost River, and observed fresh livestock degradation. During this hike, two hunters on ATVs drove by. I was a short distance away, but my colleagues informed me that one of them had a freshly shot black wolf strapped onto the back of his ATV. After my group finished that hike and drove only a few miles to the south, we observed and spoke to two Wildlife Services employees who were attempting to kill more wolves in the Swamps area of the Copper Basin allotment. They informed us they had set traps along the East Fork of the Big Lost River. We checked the Annual Operating Instructions for that allotment and learned that cattle had been required to vacate this unit on July 31 (over two months prior). I found it very disturbing that Wildlife Services was trapping wolves to ostensibly protect cattle in trespass. I was also saddened at the clear combined impacts on wolves of hunting and Wildlife Service killing

happening in this area. This area is good wolf habitat and I feel like it could support wolves, but it will be very difficult for them to establish with such dual pressures.

47. I still have never seen or heard wolves or their sign in Copper Basin. I would very much like to.

48. Another area that I frequently visit and hope to see or hear wolves is the Stanley Basin and Sawtooth National Recreation Area (“SNRA”). I first visited the SNRA in the 1970’s when I was a child. We went there to view the mountains and take in the sights. During this visit I remember visiting Redfish Lake and seeing kokanee spawning in Fishhook Creek and coming to love the area.

49. Since that first visit, I have returned to the SNRA innumerable times, and I continue to visit there regularly, which I will keep doing for the foreseeable future. During my visits I always hope to observe wolves, look for signs of wolves like footprints and scat, and enjoy seeing the ecosystem and knowing that wolves are there.

50. Over the years I have seen changes in elk behavior presumably due to the presence of wolves in the ecosystem. Elk seem to now spend less time in the riparian and meadow areas where once they would commonly be seen in these areas during the day. The elk seem now to be using these areas primarily at night.

51. I have seen wolves in and near the Sawtooth National Recreation Area on numerous occasions. For example, in the spring of 2003, I saw a wolf from the Basin Butte pack in the Stanley Basin as it crossed the foothills of the White Cloud Mountains. In the spring of 2006, I watched and photographed another member of the Basin Butte pack carry away an entire leg of an elk it had killed earlier that morning from the intersection of Highway 21 and Highway 75 in the middle of Stanley, Idaho.

52. In July 2010, I observed two black pups from the Buffalo Ridge pack in the Squaw Creek drainage just north of the SNRA. This was a special treat for me since I had only seen pups at a great distance in Yellowstone. On this occasion I was able to howl and have them respond for most of an evening. This was the last time that I was able to see wolves in Idaho despite many attempts to see or hear them since.

53. For both personal and professional reasons, I regularly visit other parts of central Idaho where wolves have been present following the wolf reintroduction to central Idaho, including parts of the Sawtooth and Salmon-Challis National Forests, and BLM's Challis, Salmon, and other field offices. I plan to continue my pattern of regularly visiting these natural areas throughout Idaho, including the Stanley Basin, SNRA, Copper Basin, and East Fork Salmon River, repeatedly in the near future, including this summer.

54. My enjoyment of these areas increases just knowing that the ecosystem is in its natural state because wolves are present. Activities by Wildlife Services that kill wolves, remove wolf packs, and reduce the wolf population in Idaho injure my interests in observing, studying, and looking for wolves and my enjoyment of being in an ecosystem that I know is in its natural state because wolves are there.

#### **Wolves' Role in Ecosystem**

55. As the top carnivore in its ecosystem, the wolf plays an important role. Wolves have a large influence on ecology, which is primarily manifested by changes in vegetation as a result of changed elk behavior. Elk, which are browsers of willow, aspen, cottonwood, and other plants, alter the way they use their habitat in response to wolf presence. They avoid areas where they feel vulnerable to predation by wolves and this is believed to have resulted in increases in

willow, aspen, and cottonwood recruitment in riparian areas. Increases in these species benefits many other species including neo-tropical bird species, beavers, and fish.

56. The presence of wolves, and their resulting kills, also benefits scavengers such as bald eagles, golden eagles, ravens, crows, and magpies. The presence of wolves has also benefitted red fox populations as a result of reduced coyote abundance.

57. Many published studies have documented the important role wolves play in the ecosystem as I have just described. *See, e.g.*, William J. Ripple and Robert L. Beschta, Linking Wolves and Plants: Aldo Leopold on Trophic Cascades, *Bioscience* Vol. 55, No. 7, pp. 613-621 (July 2005); Robert L. Beschta and William J. Ripple, Recovering Riparian Plant Communities With Wolves In Northern Yellowstone, U.S.A., *Restoration Ecology* Vol. 18, Iss. 3, pp. 380-389 (May 2010); Roemer et al., The Ecological Role of the Mammalian Mesocarnivore, *Bioscience* Vol. 59, No. 2, pp. 165-173 (Feb. 2009); Fortin et al., Wolves Influence Elk Movements: Behavior Shapes a Trophic Cascade in Yellowstone National Park, *Ecology* Vol. 86, Iss. 5, pp. 1320-1330 (May 2005); Beschta, R.L. Reduced Cottonwood Recruitment Following Extirpation of Wolves in Yellowstone's Northern Range. *Ecology* 86(2), 2005: 391-403; Beschta, R., and W.J. Ripple. Riparian vegetation recovery in Yellowstone: The first two decades after wolf reintroduction *Biological Conservation* 198, 2016: 93-103; Beschta, R., and W.J. Ripple. Are wolves saving Yellowstone's aspen? A landscape-level test of a behaviorally mediated trophic cascade - *Comment Ecology*. [doi:10.1890/11-0063.1] 94(6), 2013: 1420-1425; Beschta, R.L., L.E. Painter, T. Levi, and W.J. Ripple. Long-term aspen dynamics, trophic cascades, and climate in northern Yellowstone National Park *Canadian Journal of Forest Research* 46, 2016: 548-556; Beschta, Robert L., and Ripple, William J. Increased Willow Heights along northern

Yellowstone's Blacktail Deer Creek following wolf reintroduction. *Western North American Naturalist* 67(4), 2007: 613-617.

58. I sent Idaho Wildlife Services many of these studies by letter dated June 22, 2016. I also regularly send the agency new studies concerning wolf control when I see them published or in the media, and ask it to update its predator control programs and analysis accordingly. While the agency sometimes acknowledges my communications, it never responds substantively with any changes to its management program.

#### **Wildlife Services' Wolf Killing in Central Idaho**

59. In the course of my personal and professional activities described above, I have observed that Wildlife Services focuses much of its control activities on wolves in central Idaho, including in and around the SRNA, Stanley Basin, East Fork Salmon, and other areas described above.

60. Over the years I have used public records requests, information publicly available on the internet, and other sources to attempt to track Wildlife Services' wolf killing activities in Idaho. It is very difficult to obtain timely and complete information about its wolf killing actions, however, because Wildlife Services does not publicly disclose its actions in advance; has not complied with NEPA (as noted above), and tends to operate behind a shroud of secrecy.

61. Based on reports I have obtained from IDFG, U.S. Fish and Wildlife Service, and other sources, I have calculated that Wildlife Services killed at least 343 wolves in Idaho during the period between 1995-96, when wolves were reintroduced into central Idaho, and 2010, when wolves were removed from federal protection under the Endangered Species Act.



62. In 2005, Wildlife Services killed a total of 20 wolves in Idaho. The wolves belonged to the Chesimia, Buffalo Ridge, Copper Basin, Partridge Creek, and Hyndman Group packs.

63. In 2006, Wildlife Services killed 29 wolves from the Big Water, Blue Bunch, Blue Mountain, Buffalo Ridge, Carey Dome, Chesimia, Copper Basin, Danskin Mountain, Jungle Creek, Moyer Basin, Packer John, Steel Mountain, and Timberline Packs.

64. In 2007, Wildlife Services killed 48 wolves from the Moyer Basin, Morgan Creek, Lemhi, Gold Fork, Copper Basin, Picabo, Carey Dome, High Prairie, Moores Flat, Steel Mountain, Pilot Rock, Jureano Mountain, Jungle Creek, Packer John, and Falls Creek packs.

65. In 2008, Wildlife Services killed 59 wolves and four entire packs. The packs that were impacted or removed were the Steel Mountain, Packer John, Pass Creek, Moores Flat, Basin Butte, Doublespring, Hard Butte, High Prairie, Applejack, Galena, Jureano Mountain, Stolle Meadows, SW-64, and Buffalo Ridge packs.

66. In 2009, Wildlife Service killed 73 wolves and 4 entire packs. The packs impacted or eliminated were the Thorn Creek, Biscuit Basin, Stolle Meadows, Lemhi, Little Wood River, Snake River, Basin Butte, Prairie, Steel Mountain, Bluebunch, Middle Creek, Timberline, Applejack, Bitch Creek, Falls Creek, Sage Creek, Hard Butte, and Hornet Creek packs.

67. The Basin Butte wolf pack was located in the Sawtooth Valley on the outskirts of Stanley and was one of the most watched packs in all of Idaho. As I mentioned above, I observed members of this pack. Wildlife Services gunned down the majority of this pack, in the two days before Thanksgiving in 2009 due to depredations that had occurred in previous months

and years. Once again, I was deeply saddened to learn Wildlife Services had killed a pack I had observed.

68. Since Wildlife Services killed the Basin Butte pack, wolf watching has greatly suffered within the Sawtooth Valley. On subsequent occasions when I have visited the area, I searched but saw no sign of wolves in places where I had come across numerous tracks and other signs in the past. It is disheartening that the SNRA, once a place where one would stand a reasonable chance of seeing wolves, has become a sinkhole for wolves.

69. The vast majority of these wolf control actions occurred in western and central Idaho. The majority of the packs that have been removed from the SNRA used the central and eastern portion of the recreation area. Based on my experiences in the SNRA, I know that the central and eastern portions of the SNRA are also the areas most used by tourists and recreationists. The consistent removal of wolves from the central and eastern portions of the SNRA deprives visitors to the area of the opportunity to view wolves or wolf tracks in the wild. The many tourists who visit the eastern half of the SNRA also lose out on the opportunity to observe and enjoy an ecosystem in its natural state because the top predator is consistently removed.

70. In 2010, Wildlife Services – for the first time – issued a draft EA under NEPA for its Idaho wolf killing activities. WWP commented on that draft EA, and advised Wildlife Services that a full EIS was needed to comply with NEPA in light of the high scientific and public controversy surrounding its wolf control actions, and significant but uncertain impacts they pose. However, Wildlife Services refused then, and still refuses, to fully disclose and analyze its Idaho wolf control actions through a NEPA-compliant EIS.

71. Since wolves have been delisted under the ESA, and the State of Idaho has taken over wolf management, Wildlife Services has actually expanded the scope of its wolf killing actions in Idaho beyond controlling wolves that are deemed depredation threats to livestock. Now Wildlife Services is actively assisting IDFG in wolf killing for purposes of elk and other wild ungulate management. The focus of this activity so far appears to be in the Lolo and Selway Zones of central Idaho, which form part of the larger central Idaho core recovery areas for wolves.

72. Since issuing the draft Idaho Wolf EA in 2010 (which was finalized in March 2011), Wildlife Services has continued to kill wolves all around the state, but especially in central Idaho. Based on wolf mortality information obtained through state records requests and the 2014 and 2015 annual wolf reports, at least 598 wolves were killed in response to livestock depredations. While some of these were killed by private ranchers, I believe that Wildlife Services was responsible for the vast majority of these deaths.

73. At eleven of these mortalities were of wolves that spent time in the SNRA. I calculated this using a database of wolf mortalities that I have obtained from the IDFG that ranges from 2006 to 3/27/2014. Using this database and ArcMap version 10.3.1 (GIS), I selected all of the animals killed directly within the SNRA, and animals associated with packs that spend all or part of their time in the SNRA, and hunting zone 36 which is mostly within the SNRA. When I filtered that data for only mortalities that occurred from 2011 to 2014, I came up with 27 mortalities. Of those, 11 were USDA Wildlife Services mortalities.

### **Injuries from Wildlife Services' Wolf Killing Activities**

74. Wildlife Service's campaign of killing wolves in Idaho greatly harms my interest in wolves and ability to observe wolves in Idaho, and if it continues to do so, it will continue to harm those interests.

75. As noted above, Wildlife Services has killed and continues to kill wolves and packs of wolves in places that I visit regularly, care about, and recreate in, including the SNRA, Stanley Basin, Copper Basin, and the East Fork Salmon River area. This has greatly injured my ability to enjoy the areas. It has perceptibly reduced the number of wolves in the areas and reduced my ability to see or hear them.

76. It is much harder to view wolves in the past few years due to Wildlife Services' killing and Idaho's hunting season. I have made many trips to areas where I have seen or heard wolves or their sign to search for wolves, but have not had much success in recent years. This is especially true in areas where Wildlife Services has been most active.

77. I have not seen wolf sign in the Squaw Creek area where I have seen wolves frequently in the past. I have not seen wolf sign in Copper Basin, an area where wolves were frequently noted in the past. I have not seen wolf sign in the Stanley Basin in recent years, another area where I have seen frequent sign and observed wolves in the past. Even in areas away from livestock, where Wildlife Services has not been active, it has become more difficult to find wolves and their sign. Despite several trips to find wolves, I haven't seen or heard a wolf in Idaho since 2010.

78. My opportunities to see and hear wild wolves on Idaho public lands are and will continue to be harmed by Wildlife Services' efforts to kill wolves. Without wild wolves being present in the wild lands of Idaho, my enjoyment of these lands will be degraded in dramatic ways because of how much I enjoy watching, hearing, and tracking wolves.

79. I plan to continue to visit natural areas throughout Idaho in the near future. My enjoyment of these areas increases by trying to observe wolves and signs of wolves, and just knowing that the ecosystem is in its natural state because wolves are present. Activities by Wildlife Services and IDFG that kill wolves, remove wolf packs, and reduce the wolf population in Idaho injure my interests in observing, studying, and looking for wolves and my enjoyment of being in an ecosystem that I know is in its natural state because wolves are there.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of February, 2017, in Boise, Idaho.

A handwritten signature in blue ink that reads "Ken Cole". The signature is written in a cursive, flowing style.

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Kenneth Cole