

## Pamela Williams

In terms of scoping, ecotourism should be considered and cost/benefit analyses performed to identify the tourism dollars sacrificed due to wolf killing and to persecution - which makes this mammal even more shy and difficult to hear and see.

Based on WDFW's actions so far, there is ample data to identify the public funds expended per wolf killed. This is a critical component that must be included.

The EIS must include recent research studies evaluating the effectiveness of lethal control methods. A distinction should be made between "actions" that occur on public lands vs. private lands.

All of the alternatives should eliminate lethal control actions on public lands. At least one alternative should utilize non-lethal methods only on both public and private lands. Any alternatives that involve lethal methods should identify in detail required non-lethal methods and time scale, as well as a definition of success, before any escalation can occur. Each alternative should include requirements of livestock producers, such as range riders, herders, guard dogs, flagging, and removal of bone piles and carcasses — and require verification before WDFW gets involved.

Each alternative involving lethal methods should include analysis of trophic cascade effects that result from the killing of apex predators like wolves.