

y day, on such an average sunny afternoon as this, he seems no more than just another federal bureaucrat. A little more dedicated to fitness than most, perhaps, as he leaves his daily noon-hour workout in the gym, but still just a slim average-looking man of 50 dressed in a casual shirt and khakis. He is headed back to his modest corner office in the IBM building where the federal government has rented space, and almost no one in the consciously upscale neighborhood of coffee shops and boutiques in the revised old brownstones of downtown Helena, Mont., takes any particular notice of him.

They don't know him from the deep woods of the Northern Rockies or the numbingly trackless winter plains of Yellowstone valleys where his silent patience signals fear. They have never seen him approaching a lonely ranch house in a clearing far back from the timber where a family has been anxiously watching for hours. They are unaware that this is an amorphous character feared and hated by many on both sides of the issue of predatory blood.

"Tim Findley, from *RANGE*," Ed Bangs shouted in greeting from the end of the hall as I stepped off the elevator. I had announced myself to no one, and though I was on time for our meeting, it seemed surprising that he would recognize me well before I could him.

Bangs is full of unintended surprises. Fifteen years ago, when he was made chief of the U.S. Fish & Wildlife Service gray wolf recovery program, he was the darling of dreaming intellectuals who fantasized on romantic wild packs returning to lurk in almost any mountainscape less civilized than Central Park. Now those same people fill their websites with vigilante calls for outrage against Bangs and his "killing spree." Hardly five years ago, he was seen by ranchers as a cold-eyed devil unmoved by the sight of torn and bloody carcasses in calving pens. Now it is he they turn to as an expert when their need is for retribution.

Ed Bangs has become something of a shape shifter, charming but unpredictable. What else would you expect of a survival expert from the wilderness of Alaska whose favorite pastimes are poetry and modern dance? Don't get that wrong, Bangs is not like a Grizzly Adams in tights. He is a hardy outdoor man and the father of two who is no more afraid of a wolf than he is of an hysterical PETA representative. That is probably why the government saw him as so intellectually suited for a job that seems to

straddle the double-yellow line.

"Oh, yeah," Bangs agrees, "we're in the middle. I mean we get run over by people from both sides all the time. But what I tell them is that the whole wolf issue has nothing to do with wolves. It has to do with human values. The average mountain lion kills twice as much big game as a wolf in a year, and lions even attack humans, unlike wolves. There are thousands of mountain lions and a relative few wolves, but wolves stir up these powerful human emotions, so it becomes a big political knock-down-drag-out issue."

Raised in a working family in Ventura, Calif., Bangs followed an impulse to earn a bachelor's degree in game management from Utah State University and then add a master's in wildlife management from the University of Nevada at Reno, home of (what else?) the Wolfpack. For 13 years, he was in what he called "the perfect job" as a federal game manager on the Kenai Refuge in Alaska, tracking, hunting, teaching bear and gun safety and spending as many hours on skis or in small planes as he did in his office. Still, in the spirit of Jack London, he found time to produce two dozen articles on his wildlife experiences. But in 1988, just about the same time that a pack of wolves found their way south of the Canadian border and began establishing new dens in Montana, Bangs' wife decided their family needed a little more of civilization. Helena would do.

In Montana, Bangs and wolves soon became synonymous. As project leader for wolf recovery in the state, Bangs began the trapping and monitoring program for U.S. Fish & Wildlife Service, touring the northern regions to encounter angry ranchers, visiting local colleges and community centers to offer calming presentations on the presence—and protection—of the legendary predators.

"There are all these dark tales and fears, but the truth is that there is no record of a wild wolf having attacked anybody in the United States," he says. "We'd even see wolves wandering along in the middle of cattle herds, paying no attention to them at all. The wild ones just didn't seem to recognize cattle as something they could eat."

That would change, especially as the new Clinton administration and Bruce Babbitt began to see the wolf as emblematic of their desire to restore wilderness, beginning in the premier park showplace of Yellowstone.

"I met Babbitt a couple of times," Bangs says, "but whatever he was saying was all Babbitt himself. Like all secretaries [of the Interior] he had his own ideas, and all he ever really said to me was 'good job."

Bangs had none of the romantic notions Babbitt expressed of the "green fire" being restored in the eyes of wolves once hunted to near extinction in the lower 48. At Kenai, the job of game managers before Bangs had been to kill wolves, sometimes even from helicopters, and elsewhere in Alaska it was common for them to be shot whenever they threatened livestock or protected wildlife. Wolves, to Bangs, were like big and not particularly smart, dogs—understandable but not overpowering in either their image or skills.

"Most often we would find them watching from a distance. Just watching," Bangs says. "That was part of what made them seem frightening."

But with the political imprimatur of Babbitt, the message was sent out to the public



Ed Bangs used to be seen by ranchers as a cold-eyed devil unmoved by the sight of torn and bloody carcasses in calving pens. Now it is he they turn to as an expert when their need is for retribution.

that wolves would soon return a certain unsuspecting thrill to Yellowstone and a new balance to nature. Bangs was given the job of completing a Congressionally ordered Environmental Impact Statement on their reintroduction.

The Interior Secretary had posed and toyed with drug-calmed captive wolves brought from Canada and fed in pens prior to release. He had never seen a wolf in the wild as Bangs had, and he didn't care whether wolves had a taste for beef for not. The report to the secretary affirmed that it would be possible to introduce wolf packs into Yellowstone, but it also cautioned that the supposedly "endangered" predator would quickly reproduce and establish new territories that would go beyond the park. Eventually seven packs, or at least mating pairs, were brought in for release.

With 17 million acres of National Forest near the park, but less than half of that suitable to wolves, Bangs predicted that "sooner rather than later," the packs would expand their territories onto private land. He knew he would eventually be killing some of the same wolves he had "saved" in the release program.

"If you look at what we predicted and what has happened, you can say we're done with wolf recovery now," Bangs says. "By December we will have met all our recovery goals. Even now, I spend most of my time these days working toward delisting [of the wolf from the Endangered Species Act] by seeing that they stay recovered and that we make

# Rocky Mountain Wolf Recovery Report

By the end of 2001, estimates were of at least 34 packs of wolves in Idaho, Montana and Wyoming. Federal estimates counted 261 wolves in the Central Idaho Recovery Area, 218 in the Greater Yellowstone Area and 84 in the Montana Recovery Area. By states, that was broken down to 251 wolves in Idaho, 189 in Wyoming, and 123 in Montana.

In 2001, 40 cattle, 138 sheep, 6 dogs and 4 llamas were confirmed as having been taken by wolves; 19 were killed and 18 "translocated" in that same period. Total figures between 1987 and 2001 list 188 cattle, 494 sheep, and 43 dogs killed by wolves. One hundred seventeen molesting wolves have been moved elsewhere. One hundred three wolves have been killed, including three legally shot by ranchers.

In December of 2001, there were 563 wolves known to be living in the region. In the spring of 2002, at least 150 to 200 wolf pups were born in those packs.

some transition to state management."

That, in Bangs' view, would include not only the right of ranchers to protect their cattle (as they can now), but a hunting season on wolves, which Bangs predicts and supports as "the best thing that could happen." Only the killing of wolves by humans put the carnivores on the endangered list to start with. Impossible as it may be for their friends in the city to take, Bangs believes that only a managed program including hunting can keep them off it.

Bruce Babbitt in his cynical way knew as well as Bangs does that depredation by wolves has a miniscule impact on the overall cattle industry, but Bangs was not following a political agenda as he tracked the rapid expansion of the packs into neighboring regions. "It's nothing to the industry," Bangs says, "but to the individual family or small rancher, wolf depredation can mean disaster. We understand that and we take it very seriously."

In his report on the Yellowstone and Idaho releases, Bangs had predicted that 10 percent of the wolves turned out would eventually have to be killed because of such attacks. Up to now, the figure is actually only about five percent, but it has caused howls of protest from fanatical followers of the packs.

Recognizing the public relations value, environmental groups virtually adopted every pack of wolves released under Bangs' program, and monitored their fate on the Internet as if keeping up with backwoods family members. Now they rage about the "dirty work" of killing the predators that attack domestic livestock "in wolf territory."

However much he may be correct that wild wolves did not even initially recognize cattle as food, Bangs acknowledges that at least some packs have learned better. Weeks now seldom pass when he is not contacted by a rancher seeking a permit to shoot a molesting wolf or when Bangs himself is not called out to investigate another claim.

He can find them. He can sometimes even call them into view, but Bangs will feel no particular emotions about the wolves as either romantic legends or rogue killers. His job is management, and he carries it out with almost fearless efficiency.

"We were gun-netting one time and this New Zealand guy working with us had a wolf and shouted over to me, 'Ed, can you hold this for a minute!' I took hold of the wolf by the back of its neck, thinking the Kiwi had tranquilized it. A couple of minutes later, another helicopter landed nearby to tell me something, and this wolf goes nuts. In an instant I'm holding the animal by its face, not its neck, and 'boom' he bit into my wrist and I thought I could hear all the bones breaking. I turned loose of him and he turned loose of me, and we just stared at each other." The wolf was recaptured, tagged and released. Bangs later went to the emergency room. No bones broken, just puncture wounds.

Of such survived encounters are other legends born. Bangs has surely heard them all. Earlier this year, he was invited to Sweden, where in the dim arctic forests perhaps the most scary stories were first told and still endure. Wolves had virtually disappeared from Scandinavia as well, until packs appeared recently from Finland and Russia, touching off debates among livestock and wildlife managers much like that in the United States.

"There is evidence in Sweden that wolves may have attacked people even recently," Bangs says, "but some of those attacks may have been by hybrid wolf-dogs or rabid wolves."

And there is where myth and wild reality may somehow strangely converge. Bangs and nearly all experts agree that the far more dangerous creature, and one even the Humane Society agrees should be eliminated, is the hybrid wolf-dog—the ferocious pet someone thought could be born of mating wild and domestic species.

Apart from Bangs' territory, in the southwestern U.S., hybrids are now suspected of being among Mexican gray wolves being reintroduced. If so, the hybrids are doomed.

Bangs, however, regards his own job as almost finished. "His" wolves have expanded their territories and packs into and out of Yellowstone just as he predicted they would. An argument goes on that depredation has seriously reduced the elk herds in the park, but Bangs points to similar calf losses in the last few years among elk outside the wolf areas. The Yellowstone packs and those in central Idaho are established and certain. Their numbers alone will command consideration for delisting as among endangered species, and then it will be up to the states to determine how best to live with a reestablished legend and a twisted political emblem. Reluctantly uneasy about taking over a federal headache, Montana, Idaho, and Wyoming are currently drafting their own wolf management programs in anticipation of delisting.

"There will still be people who say there should be no wolves, but they are a tiny minority. There will be people arguing for wolves everywhere, and that's a tiny minority. We're going to have wolves. The question is how many can we have and what's a tolerable level. Wolves are a very adaptable animal, but it's us who are going to have to decide where we're going to let them live and where they won't be tolerated," says Bangs, who himself still holds that ultimate authority.

He's divorced now and immensely proud of being a single parent to his two daughters. Urbane and articulate, he is a sort of man about town in Helena with a uniquely romantic job that regularly takes him off into the wilderness he loves. The little office he has in the IBM building can't avoid evidence of the exuberance of the federal printing office in splashing wolves across covers of their reports. But strangely, there are no pictures in his office of Bangs himself in an encounter with the canines.

We drove out north of Helena into a wooded canyon for a picture that might put him in a more natural setting, and I chose the site near a small stream.

"Oh yeah, this is fine," says the American wolfman. "In fact, there's a pack that has a den just over that mountain there."

I had to wonder how he could be so sure. ■



# A Third Rate Romance

D.C.'S AFFLUENT ARE DEEP IN THEIR OWN EFFLUENT, THANKS TO THE EPA. BY DON A. WRIGHT

ust when you think things can't get any crazier along comes a fresh example of the world turned upside down. Environmentalists are suing the federal government to enforce the Endangered Species Act and the Clean Water Act. Nothing new here, but these environmentalists aren't suing the government to enforce the acts against ranchers, farmers, miners or loggers. They're suing to force the government to enforce the act against itself. This particular lawsuit could possibly bring about uniform enforcement of, and even congressional rewriting of, the ESA.

The Potomac River, flowing into Chesapeake Bay from the Appalachians, is breeding ground to the few remaining short-nosed sturgeon. At one time, the sturgeon was so populous that no less a figure than George Washington made a significant income from harvesting the fish for commercial uses. The sturgeon are anadromous fish, which means they migrate from fresh-water spawning grounds to the sea and back. The Potomac, an American Heritage River, is also metropolitan D.C.'s source of drinking water.

The National Wilderness Institute (NWI), headquartered in Washington, D.C., is spearheading an attempt to save the endangered short-nosed sturgeon in the Potomac River. NWI Executive Director Rob Gordon says the manner in which D.C. treats its water supply is unique in all of the United States. "If you want to find a water treatment facility operating this way you'd have to go to a Third World country."

The Army Corps of Engineers operates the Washington Aqueduct. Water from the muddy river is diverted into holding basins where aluminum sulfate is added. The chemical attracts solids suspended in the water and causes them to "clump" together and sink to the bottom. The remaining clarified water is siphoned off for further treatment before finding its way into the city's plumbing. Eventually the solids begin to fill

up the basin and must be removed.

Tom Jacobus, manager of the treatment plant, says this method of treating municipal water supplies is common. Jacobus, a man dedicated to providing the best water at the best price to our nation's capital, says sludge (referred to as "solids" in water treatment industry terms) is usually removed by truck and used as landfill or routed to sewage treatment plants for further processing. Every day the Corps dumps the equivalent of 15 dump trucks of sludge from the Washington Aqueduct into the Potomac River. By some esti-

mates that's 200,000 tons annually.

### **Habitat River**

The Potomac is one of the major rivers flowing into Chesapeake Bay, itself a habitat for many endangered species. According to documents filed in NWI's lawsuit, discharges from the Washington Aqueduct are not the commonly allowed 20- to 30milligrams-per-liter standard for suspended solids adhered to by similar facilities in nearby Maryland and Virginia. The levels in

D.C. are even higher, significantly higher, sometimes reaching 44,900 milligrams-per-liter and beyond.

The permit to operate the water treatment facility and giving license to the dumping of waste into the Potomac was issued by the Environmental Protection Agency's region three, headquartered in Philadelphia. The permit expired in 1994 and the treat-

ment plant has been working under an administrative extension ever since.

The extension is open-ended and has no set limits for the amount of solids that can be flushed into the river. The only considerations when dumping are that the pH balance of the effluent must be maintained at a required level and the Potomac must be flowing at a minimum gallons-per-hour rate. There are no regulations applied to the amount of chromium, lead or arsenic discharged. Gordon says permit extensions are not unusual. He does say, however, extensions running for



almost a decade are very unusual.

"When discharge takes place, there's a black plume that shoots out across the river," says Gordon. "It smells like an outhouse. We've seen carcasses of beavers coated in this viscous slime." Fishermen in the area report slim pickings anytime a discharge takes place. Gordon also says this dumping of water treatment sludge into the Potomac is nothing



The Potomac flows into Chesapeake Bay from the Appalachians and is breeding ground to the endangered short-nosed sturgeon. This "American Heritage River" is also metro D.C.'s source of drinking water. About 200,000 tons of sludge are dumped into the river annually—by our government. What say, ESA?

short of bio-fraud in the Beltway.

Not so, says Jacobus. "We are operating under all state and federal laws. And we recognize the need to act responsibly towards the environment. We spend a lot of time on engineering and safety practices." He adds that he's not in a position to address the broader political issues.

# **Sounds Familiar**

In a scenario with which many westerners with federal grazing permits and water rights can identify, NWI's pending lawsuit places Jacobus in a bit of a jam. His job is to run the plant to the best of his abilities in accordance with guidelines set forth by the EPA and other government agencies. At the same time, the Washington Aqueduct treatment plant has to pay for itself through the sale of treated water to the municipalities that contract with it. It receives no taxpayer subsidies. The fact that the facility is entirely on federal land (including a national park) and run by the Army Corps of Engineers is, in his words, "...an accident of history."

What's not an accident of history is the uneven enforcement of the ESA. An editorial published in *The Wall Street Journal*, January 10, 2002 stated, "According to a 1999 report from the House Resources Committee, while 543 species were listed in the five Far West States, only 39 were listed in the Northeast." It

went on to say 96 species were found to have critical habitats in the West. There were only nine in the East. The *Journal* opined, "Funny how all of those 'endangered animals' choose to live in only one-half the country."

In testimony to the House Resources Committee on March 20, 2002 Gordon stated, "Those who have seen Draconian enforcement of the ESA in their districts may wonder why there is apparently so little conflict between rare species and human activities in other areas. They may be surprised to learn that in the government's own backyard, ESA is simply not enforced the way it is elsewhere. Here [in the East], the benefit of the doubt is not given to the endangered species. Here, economic considerations outweigh species protection. Here, science, or what purports to be science, is employed to provide cover so that needed projects can proceed unimpeded by the ESA.'

Sam Hamilton, former U.S. Fish & Wildlife Services' director in Texas, says, "The incentives are wrong. If I have a rare metal on my property, its value goes up. But if a rare bird occupies the land, its value disappears."

The issue of value has not gone unnoticed by the locals. The Washington Aqueduct treatment plant is in the midst of one of D.C.'s most affluent neighborhoods. The Palisades area is home to senators and ambassadors. Area residents have formed a group called Citizens for Responsible Urban Disposal at Dalecarlia (CRUDD). Dalecarlia is one of the reservoirs that make up the Washington Aqueduct facility.

### **NIMBY**

It's a classic case of Not In My Back Yard (NIMBY). The NWI lawsuit cites a letter CRUDD wrote warning D.C.'s then mayor-elect Anthony Williams that elimination of the Corps' discharges would "reduce the quality of the neighborhood and thus the value of our homes." The letter told Williams "to be cautious when the environmental advisors come to you advocating the lofty, commendable goal of stopping 'environmental releases' into the Potomac."

The suit also cites a letter written by Patrick Shaughness, a D.C. advisory neighborhood commissioner, who wrote, "I am concerned that the permitting process so far has not reflected the special consideration the Aqueduct has been granted by law. Because of the unique nature of [the] Aqueduct and its Dalecarlia Water Treatment Plant, special procedures described below are required by law in considering the re-issuance of a permit it currently holds to make discharges back

# What can I do to help?

A question asked throughout the ages. Several quick responses dangle like cattails with broken stems. Pray. That's always a good one. Write, phone and e-mail your senator and representative. This provides feedback and raises awareness.

Congressman George Radanovich, a winegrape grower, understands feedback from constituents. His hometown is an unincorporated rural community in a small county by the same name called Mariposa. It's near the western entrance of Yosemite National Park.

Radanovich has served almost eight years in Congress and you might think that he's jaded by now. When asked what can be done to help straighten out the ESA to better represent all Americans he says, "Money." Nothing new there from an elected official. Except he asked that the money be sent to the National Wilderness Institute, not him or his campaign. "The NWI is taking on tremendous legal expenses going up against the government."

Contact the NWI at <www.nwi.org> or write to: National Wilderness Institute, 25766 Georgetown Station, Washington, DC 20007.

Radanovich is sponsoring a bill titled HR 472, an act to change how the ESA is enforced. You can find it at <www.radanovich.house.gov>. Read it and let the Congressman know what you think. Improving government doesn't always take more voices—sometimes it just needs louder voices. into the river."

The special procedures Shaughness referred to are, "If the discharges are no longer permitted, which amount to approximately 200 wet tons per day of effluent, my neighbors and I will bear the consequences of the alternative disposal methods, which may include extensive construction for a 'solids recovery facility' and trucking in massive 40-ton dump trucks."

"Boo-hoo" some might say. Federal regulations have been tormenting westerners with red tape and declining property values for decades. This tormenting has also not gone unnoticed by western lawmakers.

### **Notice Given**

Representative George Radanovich of California, whose district includes Yosemite National Park, has long recognized the discrepancy between the EPA's enforcement of law in the West as opposed to its enforcement of the law in the East.

"In 1997 there was a flood near Sacramento, Calif. A levy broke and three people were killed," says Radanovich. "The water agency in charge of the levy had waited six years for a permit to reinforce the levy. Any work towards reinforcement was delayed because of an endangered beetle. Yet three people lost their lives."

In an editorial published in *The Washington Times*, February 6, 2001, Radanovich wrote, "Why this indifference to violations? Rural and western communities have long noticed that laws such as the ESA have been zealously enforced against them, often with devastating effects on their communities, while the Act never seems to be applied in the urban East."

Radanovich points out that a large part of the problem was the result of questionable priorities. "A recent study by the House Resources Committee found hundreds of species had been proposed or were candidates for listing in the West while only five additional species were in the listing pipeline in the Northeast. A major reason for this absurd disparity is revealed by the staffing decisions made by the Fish & Wildlife Service. There are several hundred ESA enforcement officials stationed in the West. The Northeast, by contrast, had only 31 such employees."

### **Ludicrous Logic**

On Wednesday, June 19, 2002, the full Resources Committee of the House of Representatives held a hearing about the dumping of D.C.'s water treatment sludge into the Potomac. The hearing was significant for several reasons. Interior Secretary Gail Norton's

office submitted written testimony voicing concern over the EPA's science and expressed a desire to terminate the discharges. An internal EPA memo said the dumping of sludge "actually protects the fish in that they are not inclined to bite (and get eaten by humans) but they go ahead with their upstream movement and egg laying."

"This is one of the most frightening examples of bureaucratic ineptitude and backward logic I have ever seen," says Radanovich, who is chairman of the subcommittee on national parks, recreation and public lands. "To suggest that toxic sludge is good for fish because it prevents them from being caught by man is like suggesting that we club baby seals to death to prevent them from being eaten by sharks. It's ludicrous."

The weighing in by the Department of the Interior is forcing the light of public awareness on the EPA and the Army Corps of Engineers. According to a Capitol Hill staffer, with the exception of the National Wilderness Institute, environmental groups were conspicuous by their absence. No representatives from the Sierra Club, Greenpeace, Save Our Streams or any of the other usual "greens" were present at the hearing. The staffer also said it was telling that while the hearing was covered by national media, The Washington Post hadn't touched the story yet. The Potomac is dredged to allow barge traffic, even though this upsets the natural habitat. The Washington Post's newsprint is delivered by barge—a less expensive means of transportation than rail or truck.

## **Final Outcome**

Prognosticators with a bent towards legality predict the lawsuit is a win-win situation. If NWI loses, legal precedence (allowing massive dumping of effluents) will be set to such intolerably low standards that an outcry in the environmental community could trigger a congressional rewrite of the ESA.

On the other hand, if NWI wins, the result for the Washington elites will be 40-ton dump trucks hauling unpleasant-smelling sludge through their neighborhood—a small taste of the inconvenience rural western communities experience day-in-and-day-out. The hope is lawmakers will see the relationship between water, property values and government interference. It's telling that both Gordon and Jacobus want the lawsuit to mirror the pleas of westerners. Says Jacobus, "The outcome must be science-based. We need a rational process, not a feel good solution."

Don Wright is a freelancer from Clovis, Calif.

# **EVERY LAST BLADE...**

(Continued from page ESA 17)

to continue work on recovering and protecting the land. The South Dakota Stockgrowers Association is working in conjunction with other groups to try to educate organizations and individuals who—under the guise of "environmentalism"—are attempting to add the prolific prairie dog to the endangered species list.

Some in South Dakota and other states have mentioned incentive payments for landowners willing to lose healthy rangeland by allowing prairie dogs to flourish. "First the government tries to get rid of the pests, then the next thing you know they want to use our tax dollars to pay people to raise them," says Cuny. "It doesn't make any sense."

Land inhabited by an established colony of prairie dogs resembles an area that has been afflicted with an extreme case of overgrazing combined with drought. If any livestock producer treated his land that poorly, he would be out of business in a heartbeat. Especially in a dry year. The drought that covered most of South Dakota in the summer of 2002 only worsens the problem. Nothing but cactus is growing in many areas inhabited by dogs.

"I manage my land to make it as productive as possible," Cuny says. "If I overgraze or allow my cattle to damage waterways, I only hurt myself in the long run. I care for my land so as to maintain or improve the forage and waterways every year. It's just common business sense."

But prairie dogs don't share Cuny's philosophy on caring for the range. "They clip off every blade of grass within their dog town to eliminate protection for predators. Meanwhile, the grass dies, the soil blows and washes away, and even local wildlife such as deer and antelope are forced to look elsewhere for forage because there is simply nothing left."

Carrie Longwood is executive director of South Dakota Stockgrowers Association. The SDSGA was instrumental in blocking a proposed state "prairie dog management plan" which would have drastically interfered with landowners' abilities to manage their own land for productivity. Prairie dogs are in no way "endangered" or even "threatened." The U.S. Fish & Wildlife Service estimates 160,000 acres of active prairie dog colonies in South Dakota. According to the Montana Shooting Sports Association there are over 10 million prairie dogs in 11 western states plus "uncountable" numbers in Mexico and Canada.