



- 1929 *Division of Predatory Animal and Rodent Control.*
- 1930 *American Society of Mammalogists issued statement concerning predator control abuses. Congress held oversight hearings as a result and nearly cancelled \$1M funding.*  
 Pres. Herbert Hoover signed Animal Damage Control Act, which authorized the Secretary of Agriculture to “promulgate the best methods of eradication, suppression, or bringing under control” on both public and private lands a whole host of species, including “mountain lions, wolves, coyotes, bobcats, prairie dogs, gophers” (7 U.S.C. § 426).
- 1931
- 1934 *Section of Predator and Rodent Control, Division of Game Management.*  
*Pocatello Supply Depot in Idaho, “manufactures and sells specialized wildlife damage control material not readily available from commercial sources” (USDA-APHIS-ADC (1997) Programmatic Environmental Impact Statement (Chapter 2, p. 36)).*
- 1936
- 1938 *Division of Predator and Rodent Control (PARC).*
- 1939 *Branch of Predator and Rodent Control; moved from Division of Game Management to U.S. Department of Interior with the Biological Survey and Bureau of Fisheries (birth of USFWS).*  
 Sec. Int. Stewart Udall commissioned a committee led by Aldo Leopold’s son, A. Starker Leopold, to look into abuses by PARC.
- 1963
- 1964 The “Leopold Report” issued to Congress; it found agency to be excessive and indiscriminate with lethal toxicants, especially with Compound 1080. The Leopold Commission advocated for an overhaul of PARC to curtail excessive wildlife killing. A Congressional hearing led to minor reforms: training for agency personnel, the establishment of an outside advisory panel, and a name change. PARC became the *Division of Wildlife Services* within the U.S. Bureau of Sports Fisheries and Wildlife. (Leopold et al. 1964).
- 1964 Name change to *Division of Wildlife Services.*
- 1971 Defenders of Wildlife, Sierra Club, National Wildlife Federation and others bring a series of lawsuits over lethal toxicants.
- 1971 Sec. Int. Rogers Ballard Morton and CEQ appointed 7-person Advisory Committee on Predator Control headed by Stanley Cain
- 1972 Cain’s 207 page report offered 15 recommendations to Congress including no toxicants for predator and rodent control. Report cited an internal culture that was “resistant to change.” Pres. Richard Nixon cited report in Executive Order.
- 1972 Nixon Executive Order 11643 banned Compound 1080, strychnine, cyanide, and thallium by federal agents on federal public lands. Then Environmental Protection Agency Administrator (EPA), William D. Ruckelshaus, cancelled all usage of these

two toxicants for killing native carnivores by administrative order. 37 Fed. Reg. 5718 and 40 Fed. Reg. 44726, 44734-35. The order noted the acute toxicity of these poisons as well as their propensity to cause secondary and accidental poisonings. Administrator Ruckelshaus noted in his order that the device used to administer sodium cyanide pellets, “the humane coyote getter”, which relied on a gunpowder explosion to propel the cyanide, likely posed a significant risk to humans.

- 1972 Nixon drafted ADC Act of 1972; it would have substantially changed the agency. Hearings on the ESA and Animal Damage Control bill (to repeal 1931 ADC Act). Congressman John Dingall (D-MI) introduced ADC Act of 1972. It passed House, but failed to come to a vote in Senate.
- 1974 Name changed to *Office of Animal Damage Control*
- 1975 Pres. Gerald Ford Executive Order—allowed for experimental use of M-44s. The U.S. Fish and Wildlife Service (FWS) requested that the EPA re-allow the usage of sodium cyanide capsules for exterminating native carnivores. It wanted to replace the “coyote getters” with a new device, the M-44, a booby-trap, which used a spring, rather than gunpowder, to propel the cyanide. The FWS claimed that the M-44 was safer than the “coyote getter.” The FWS request was supported by the States of Wyoming and Montana, the Navajo Nation, National Wool Growers’ Association, American National Cattlemen’s Association, and National Turkey Federation. Opposition to the request came from Environmental Defense Fund, Defenders of Wildlife, Friends of the Earth, National Audubon Society, Natural Resources Defense Council, Animal Protection Institute, and others. An administrative law judge concurred with the FWS and its allies and reversed the 1972 ban on cyanide—with several stipulations. Starting in 1975, M-44s could only be used if 26 use restrictions were followed. As part of the use restrictions, M-44s were prohibited in habitats of threatened or endangered species, in wildlife refuges, and other special areas.
- 1977 The FWS petitioned the EPA and requested that it be allowed to use Compound 1080 in carcasses (“bait stations”), in single-dose baits, smear posts, and so-called “livestock projection collars” (LPCs), which are harnesses that strap poison-filled bladders around the heads of sheep and goats.
- 1978 Sec. Int. Cecil Andrus convened new oversight panel on Animal Damage Control. Report issued that was critical of the agency.
- 1979 Andrus stopped denning and Compound 1080 research.
- 1979 USFWS issued ADC EIS.
- 1980 Name changed to *Animal Damage Control* (ADC). As a result of Andrus’ actions, agricultural community pressured Congress; it wanted ADC moved back to USDA.

- 1981 EPA held public hearings on predator control.
- 1981 Sec. Int. James Watt rescinded denning ban.  
An administrative judge ordered that the EPA reconsider the use of Compound 1080 in LPCs and single-dose baits, but denied FWS's request that the toxicant be administered in large bait stations and smear posts. Several non-governmental organizations and states and the federal government filed an appeal. Administrator Ruckelshaus, who had concurred with the Nixon Executive Order of 1972 rescued himself from the matter and appointed his assistant administrator to make a decision. Compound 1080 was reinstated for use in LPCs.
- 1982
- 1985 Pres. Ronald Reagan's Executive Order 12342 rescinds Nixon's poisons ban.
- 1985 Congress moved ADC to USDA (under Dept. of Interior since 1939) via a rider.
- 1990 Draft EIS issued for public comment.  
The FWS released its Biological Opinion, which stated that M-44s could affect endangered species including the Florida panther, jaguarundi, ocelot, gray wolf, San Joaquin kit fox, grizzly bear, Louisiana black bear, California condor, and Hawaiian and Mariana crows. It restricted geographical locations where M-44s could be used to protect those animals. With regards to Compound 1080, the FWS's Biological Opinion determined that this toxicant could harm gray wolves, the Louisiana Black Bears, and grizzly bears, and thus the FWS restricted this chemical agent's use from specified areas where those species occurred.
- 1993
- 1994 Programmatic Environmental Impact Statement issued under the National Environmental Policy Act.  
EPA issued its Reregistration Eligibility Determination on M-44s. It concluded that, "the M-44 did not pose unreasonable risks to humans or the environment" if the toxicant was used pursuant to newly-revised 26 use restrictions, that included specific restrictions to protect endangered species as outlined by FWS's 1993 Biological Opinion.
- 1994
- 1997 Name changed to *Wildlife Services* (WS)
- 1998 Bass-Defazio Amendment: June 23 cuts \$10M funding; restored next day because of lobbying efforts by the Farm Bureau, Congressman Joe Skeen, and others.
- 1999 American Society of Mammalogists issued another statement condemning indiscriminate predator control by WS.
- 1999 Federal District Court issues the Waco decision which favors Farm Bureau and prevents release of public information — oversight of agency declines.
- 2002 USDA-Office of Inspector General (OIG) found that USDA-APHIS-WS lost 60 pounds of strychnine-treated baits and over 2,000 cyanide capsules. Acting

- Inspector General Joyce Fleishman testified before Congress that WS could not account for its state-level inventory of toxins.
- 2004 USDA-OIG's audit found WS out of compliance with storage of hazardous pesticides and drugs—they could easily be stolen and used for unauthorized purposes.
- 2005 USDA-OIG's audit found that WS had not secured its aircraft from potential terrorists threats.
- 2005 USDA-OIG's audit found that WS had still not secured “dangerous biological agents and toxins.”
- 2006 USDA-OIG's audit found WS out of compliance with toxics regulations; unauthorized persons had access to toxicants; poison applicators had inadequate training; inventories of toxins were open to theft, transfer, or sale. Of the site the OIG visited, none were in compliance with storage of toxins.
- 2007 Two WS aerial gunning craft crashed resulting in 2 fatalities and 2 serious injuries. Since 1979, WS experienced 54 total aerial-gunning accidents; 23 minor injuries; 9 serious injuries; and 10 fatalities.
- 2007 WS noted that it had serious internal problems in a newsletter that stated:  
*In the wake of several accidents in WS' programs, WS is conducting a nationwide safety review focusing on aviation and aerial operations, explosives and pyrotechnics, firearms, hazardous chemicals, immobilization and euthanasia, pesticides, vehicles, watercraft, and wildlife disease activities. The review will be conducted by subject matter experts from WS, federal and state government, and private industry. We expect the review to be completed in the next year.*
- 2007 WildEarth Guardians et al. submit a rulemaking petition to the Environmental Protection Agency (EPA) that requested a ban on sodium cyanide M-44s and Compound 1080 livestock protection collars. (Docket number, EPA-HQ-OPP-2007-0944) because of abuses and hazards associated with these toxicants. The EPA organized a public comment period from November 2007 to March 2008. EPA received 53,000 public comments in opposition to these two predator poisons. WS's issued a safety review of its internal program. The document failed to look at public safety issues—an enormous omission given the Inspector General reports—but it did look at employee safety matters. In the instance of the aerial gunning program, for instance, the report found that the agency operated in the highest caliber and worthy of a “gold standard.” The report stated: *It is the opinion of the Aviation Resource Management Survey (ARMS) Team that the WS aviation program is being operated in a safe, efficient, and effective manner. The WS aviation program meets the requirements of the ICAP [Interagency Committee on Aviation Policy] Gold Standard Certificate program.*
- 2008 On January 16, 2009, the EPA made a determination not to cancel or suspend these toxicants; on January 30<sup>th</sup>, WildEarth Guardians asked the Administrator Lisa Jackson to reconsider the decision in light of the change in Administrations. Again, WildEarth Guardians received an adverse decision. In March, WildEarth Guardians met with EPA officials in Washington, DC. They agreed to take another

look at the petition.

2009 WildEarth Guardians issued its report to the Obama Administration and Congress: "War on Wildlife: The U.S. Department of Agriculture's 'Wildlife Services,' and called for the abolition of WS.

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2009 WildEarth Guardians submits petition to Obama Administration and requests a ban on aerial gunning and poisoning activities on federal public lands.