

WILDEARTH GUARDIANS

March 6, 2008

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Re: Request to cut Funding for the USDA-APHIS-WS's Wild Carnivore-Killing Program

To the Honorable Sens. Kohl and Harkin and Reps. DeLauro and Peterson:

We the 30 undersigned organizations, and on behalf of our 10.9 million members across the nation, respectfully submit the following request that lethal predator control funding be discontinued for the U.S. Department of Agriculture (USDA) - Animal and Plant Health Inspection Service (APHIS) - Wildlife Services (WS). Most Americans strongly support protection of wildlife, endangered species, and carnivores. Several reasons for discontinuing federal support for predator control exist. Predator control activities are (1) generally ineffective and ecologically harmful; (2) fiscally irresponsible; (3) inhumane and against the public's interest; and (4) a national security hazard. It is time for a change that reflects these facts and that embodies a more enlightened set of values, the weight of public opinion, and public safety.

The WS's Program is Ineffective, Ecologically Harmful, & Fiscally Irresponsible

Large-scale predator eradication is biologically harmful, economically expensive, and inherently non-selective (Treves and Karanth 2003, Mitchell et al. 2004, Stolzenburg 2006). In fact, there is no correlation between the number of coyotes killed and the number of lambs lost (Knowlton et al. 1999, Mitchell et al. 2004). Lethal predator controls do little to benefit the sheep industry; market forces—primarily the price of hay, wages, and lambs—play a far greater role in the decline of the sheep industry than do predators (Berger 2006).

On behalf of agribusiness, over 100,000 native carnivores such as coyotes, bobcats, foxes, bears and wolves are killed each year (in FY06, WS killed 117,113). The numbers of predators killed to protect livestock is highly disproportionate—one study showed that somewhere on the order of between 1.5 to 9.7 million animals were killed for the benefit of agricultural interests “without

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cause,” or indiscriminately, by federal agents during the period 1996 to 2001 (Treves and Karanth 2003). These high levels of predator killing have been aptly dubbed the “sledgehammer” approach to wildlife management (Logan and Sweanor 2001, Mitchell et al. 2004, Stolzenburg 2006). Lethal controls, including poisons, are unselective for specific animals, and are used to remove the most individuals from an area (Mitchell et al. 2004). Yet carnivores are important ecosystem actors. Native carnivores such as wolves, mountain lions, and coyotes increase the richness and complexity of animal life and indirectly contribute to better ecosystem function.¹

Year	Budget	Total Animals Killed	Total Killed Per Hour	Mammals Killed	Mammals Killed Per Hour
2004	\$101,490,740	2,767,152	316	179,251	20
2005	\$99,792,976	1,746,248	199	170,814	19
2006	\$108,590,001	1,642,823	188	207,341	24

Between 2004 and 2006, WS killed 6,156,223 total animals to protect agricultural interests—at an average annual cost of \$100 million. (Table 1.) Most animals were killed with lethal poisons, others with traps and guns. Many were shot from aircraft (see www.goAGRO.org). In the past decade, Wildlife Services has killed an increasing number of

species that are protected under the Endangered Species Act.

Sheep and Cattle Losses from Predators are Miniscule and do Not Justify Wildlife Services' Aggressive Killing Schemes

Despite calls from agribusiness for more WS’s funding, Congress should consider the tiny effect predators have on livestock; instead, a reduction in is justified. The USDA’s own data show that few cattle and sheep die from predation (see Tables 2 through 5).

Every year the USDA’s National Agricultural Statistics Service (NASS) reports on the U.S. cattle and sheep production inventory. Every five years, NASS counts unintended cattle and sheep deaths from predation, weather, disease, and other causes. The most recent report released for cattle deaths is 2006 and, for sheep, 2005. The reports reflect data from the previous calendar year.

In 2004, sheep producers raised 7,650,000 animals nationwide (USDA NASS 2005b) (USDA NASS 2005b). Native carnivores and domestic dogs killed 3% of the total production, or

¹ Prior to 1995 in Yellowstone National Park, elk had decimated willow and aspen stands. When wolves were reintroduced, elk were forced to be more mobile to avoid predation. With less elk herbivory, willow and aspen communities returned. Beavers followed; they used the new trees and shrubs to build their dams and lodges. Those structures not only brought water from underground to the surface, but made water flow more dependable. As a result, neotropical and water-wading birds and moose populations increased and diversified (Smith et al. 2003). Secondly, the presence of mountain lions in desert ecosystems can have the same top-down effects resulting in increased biological diversity and functionality of rare riparian systems (Ripple and Beschta 2006). Third, coyotes regulate populations of medium-sized carnivores such as skunks, raccoons, and house cats. Thus coyotes indirectly benefit ground-nesting birds (Crooks and Soule 1999) and make rodent species diversity more robust (Henke and Bryant 1999). Mezquida et al. (2006) found that coyotes indirectly benefit sage grouse populations—a species on the brink.

224,200 sheep (USDA NASS 2005c). In comparison, 5% of sheep died from illness, dehydration, falling on their backs or other causes (USDA NASS 2005c) [Tables 2 & 3].

Table 2 Sheep and Lambs Produced in 2004 & Total Unintended Mortality		
Total Sheep & Lambs Produced in U.S.	Total Predator-Caused Sheep Deaths	Total Sheep Deaths From Other Causes*
7,650,000	224,200	376,100
100%	2.9% of total production	4.9% of total production

Table 3 *Other Causes of Sheep Mortality	
Illness/Disease	159,350
Lambing	53,400
Unknown	48,100
Old Age	39,900
Weather	39,450
Starve, Dehydrate, Fire	19,400
Poison	10,300
On Their Back	3,800
Theft	2,400
Total	376,100

The Colorado Woolgrowers website claims that Colorado is the fifth largest sheep producer in the U.S. (CWGA 2008). A report by the Colorado Agricultural Statistics Service (July 2007) shows that the sheep industry decline 48% since 1990. Even Colorado WS admits that “the sheep and wool market had declined making it *uneconomical to raise sheep*” (WS June 2005 CO PDM EA at 11, emphasis added). Yet, WS provides devoted attention to protecting sheep—an industry hammered by global markets, not predators.

In 2005, U.S. producers raised 104.5 million head of cattle (USDA NASS 2005a). Of the 104.5 million cattle that were produced in 2005, 190,000 (or 0.18%) died as the result of predation from coyotes, domestic dogs, and other carnivores (USDA NASS 2006). In comparison, livestock producers lost 3.9 million head of cattle (3.69%) to maladies, weather, or theft (USDA NASS 2006) [Tables 4 & 5].

Table 4 Cattle & Calves Produced in 2005 & Total Unintended Mortality		
Total Cattle (Beef, Dairy, Etc.) Produced	Predator-Caused Cattle Deaths	Cattle Deaths From Other Causes*
104,500,000	190,000	3,861,000
100%	0.18% of total production	3.69% of total production

The Public’s Interest in Wildlife & Balancing the Economic Equation

According to the Bureau of Land Management (BLM) (2004), “ranching tends to be a low- or negative-profit enterprise, and public land ranchers are no exception.” The BLM (2004) adds, “data show that operations in all regions had, on average, negative returns.” The federal agency charged with managing most of the ranches in the West acknowledges that ranching is a poor way to make a living—even when grazing fees are enormously subsidized by the government, and even though Wildlife Services provides heavily subsidized predator-control activities.

The impulse to ranch, suggests the BLM, is not for profit but for social considerations such as “family, tradition, and a desirable way of life” (USDI BLM 2004). There are roughly 23,000 public lands ranching permittees. In one study of Forest Service and BLM ranchers, two general groups of ranchers emerged: hobby ranchers, which represented 50.5% of the total, had diversified income sources, and generally had small operations; and, secondly, dependent

ranchers, who represented 49.5% of the total, were more dependent on ranching income, and ran larger operations which used public lands (USDI BLM 2004). Thus, most ranchers in the West are in the business for pleasure and social reasons, or as a hobby, but not to make a living. Compare 23,000 ranching permittees, half of which are hobby ranchers, with the number of other citizens who appreciate wildlife and spend billions to engage in their various recreational pursuits. [Table 6].

Respiratory Problems	1,110,000
Digestive Problems	648,000
Calving	572,000
Unknown	474,000
Weather	275,000
Other	271,000
Disease	174,000
Lameness/Injury	132,000
Metabolic Problems	78,000
Mastitis	67,000
Poison	39,000
Theft	21,000
Total	3,861,000

The U.S. Department of Interior, FWS et al. (2007) reported that in the U.S. in 2006, 12.5 million people hunted, 30 million fished, but 71.1 million people watched wildlife (USDI FWS 2007). [Table 6.] The wildlife-watching group increased substantially from the 2001 study, while the number of hunters and anglers declined (USDI FWS 2001a). The hundred billion dollars spent annually to pursue these pursuits is enormous, especially when compared to the flagging ranching sector.

The fundamental question with regards to wildlife management in the agricultural sector is this: Do taxpayers owe agribusiness a living? If so, at what cost to the public’s interest in wildlife protection?

Americans should not be required to further subsidize unnecessary predator control activities serving a select segment of the population. Given that the entire public lands ranching community is made up of 23,000 permittees and that more than half of those produce livestock for social and not economical reasons, WS’s funding should, in fact, be reduced, and the predator-control program eliminated.

Wildlife-Killing Programs are Inhumane

Humaneness issues vex WS. WS’s own agents admit they have had “diminishing acceptance”—even among wildlife colleagues—when it comes to “guns, traps, and poisons” (US GAO 2001). Muth et al. (2006) studied the response of over 3,000 wildlife professionals and found that most favor a ban on trapping. That is because these kill methods—particularly poisons and traps—are inherently indiscriminate, can be excruciatingly painful, stressful, and injurious (Mason and Littin 2003, Littin and Mellor 2005, Muth et al. 2006, Iossa et al. 2007).

Wildlife Services is a National Security Hazard

WS has failed numerous federal audits that put the public at risk.

In 2002, the Office of Inspector General (OIG) found that “APHIS could not account for 60 pounds of strychnine-treated bait and over 2,000 capsules containing sodium cyanide” (USDA OIG 2002). The following year, APHIS-WS could account for these toxins, but failed to put in place an “adequate chemical inventory and tracking system” (USDA OIG 2004). In her 2002

statement before Congress, Joyce Fleishman, Acting Inspector General for the USDA reported, “we found that APHIS lacks adequate accountability and control over hazardous pesticides and drugs maintained by some of its State offices for use in wildlife damage control” (Fleischman 2002).

In a 2004 OIG report, Assistant Inspector General Robert Young found that WS could not “fully account for its inventories of hazardous pesticides and controlled drugs” and that the materials were stored in unsafe and insecure ways leaving hazardous material “vulnerable to undetected theft and unauthorized use, and may pose a threat to human and animal safety” (USDA OIG 2004).

	No. Participants	Expenditures
Hunters	12.5 million	\$22.9 billion
Anglers	30.0 million	\$42.2 billion
Wildlife Watchers	71.1 million	\$45.7 billion

In 2005 and 2006, the USDA OIG failed APHIS in two audits because the agency was not in compliance with the Bioterrorism Preparedness and Response Act. In the first, the OIG found that APHIS had not secured “dangerous biological agents and toxins” (USDA OIG 2006a). In the second, the OIG found that APHIS-WS was not in compliance with regulations; unauthorized persons had access to toxicants; individuals using toxicants had inadequate training; and that inventories of hazardous toxicants were open to theft, transfer, or sale (USDA OIG 2006b). Of the sites OIG visited, none were in compliance (USDA OIG 2006b).

In its November 5, 2007 stakeholder newsletter, WS issued an astonishing revelation:

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. (Emphasis added.)

WS experienced two aircraft crashes in 2007 as part of its aerial-gunning program. The June, Utah event ended in two fatalities, and the September, Texas one resulted in two serious injuries (see www.goAGRO.org). WS’s news of a “wake of several accidents” comes on the heels of several failed federal audits relative to WS’s storage, inventory, and access to its toxics supply.

After WS’s November 2007 disclosure, Sinapu (n/k/a WildEarth Guardians) and PEER requested that WS conduct the national safety review with public transparency. WS dismissed our concerns. In a November 14th response, Deputy Administrator William Clay wrote that the agency itself would select auditors who “demonstrated professional expertise” and who were “unaffiliated” with the agency. WS plans to embed the outside auditors with an agency insider. Mr. Clay told Sinapu and PEER that the public would have the opportunity to “read the final [national safety review] document” upon completion.

Congressional Precedent for Reform & Conclusion

Through a plethora of investigations, committee reports and attempts at reform over a period of eight decades, the agency that kills wildlife to benefit agribusiness has only limited its activities when compelled to do so. Congress has played an important role in making reform happen.

In 1964, Secretary of the Interior Stewart L. Udall's Advisory Board on Wildlife and Game Management, issued the "Leopold Report" (named for its chairman, Dr. A. Starker Leopold, son of pioneering ecologist Aldo Leopold). The Leopold Report described the killing agency as a "semi-autonomous bureaucracy whose function in many localities bears scant relationship to real need and less still to scientific management" (Robinson 2005). The Leopold Report offered reform recommendations to Congress.

In 1971, Secretary of the Interior C. B. Morton convened another investigative committee, this time, chaired by Dr. Stanley A. Cain. The 207-page "Cain Report" lamented that the predator-control program "contains a high degree of built-in resistance to change" and that monetary considerations that favored the livestock industry served to harm native wildlife populations (Cain et al. 1971). The Report called for substantive changes to wildlife management regimes by changing personnel and control methods, valuing "the whole spectrum of public interests and values", and asserting protections for native wildlife (Cain et al. 1971 , Robinson 200).

Without firm Congressional resolve, the USDA-WS will continue to test limits that are beyond the pale. WS's sloppy practices have resulted in failed safety audit after failed audit. The agency's "sledgehammer" approach cannot be justified by its numerous costs and risks. Sheep and cattle losses from predators are insignificant, 3% and .18%, respectively, and yet \$100 million dollars is spent each year to kill millions of animals in a way that many find abhorrent and disagreeable. It is taxation without representation, to paraphrase a founding father. Compare the ranching industry's 23,000 public lands permittees to the 71.1 million people who spend \$54.7 billion to watch wildlife each year. Our request presents Congress with a unique opportunity to trim the federal budget, protect public safety, and conserve native wildlife populations.

Sincerely,



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Bibliography

- Berger, K. M. 2006. Carnivore-Livestock Conflicts: Effects of Subsidized Predator Control and Economic Correlates on the Sheep Industry. *Conservation Biology* 20:751-761.
- Cain, S. A., Advisory Committee on Predator Control, Council on Environmental Quality, and U.S. Department of the Interior. 1971. Predator control: Report to the President's Council on Environmental Quality by the Advisory Committee on Predator Control.
- Colorado Wool Growers Association. February 2008. Homepage.
- Crooks, K. R. and M. E. Soule. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. *Nature* 400:563-566.
- Dunlap, T. R. 1988. *Saving America's wildlife*. Princeton University Press, Princeton, N.J.
- Fleischman, J. N. 2002. Statement of Joyce N. Fleischman, Acting Inspector General, U.S. Department of Agriculture. Subcommittee on Agriculture, Rural Development, Food and Drug Administration.
- Henke, S. E. and F. C. Bryant. 1999. Effects of coyote removal on the faunal community in western Texas. *Journal of Wildlife Management* 63:1066-1081.

- Iossa, G., C. D. Soulsbury, and S. Harris. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare* 16:335-352.
- Knowlton, F. F., E. M. Gese, and M. M. Jaeger. 1999. Coyote depredation control: An interface between biology and management. *Journal of Range Management* 52:398-412.
- Leopold, A. 1949, Reprint 1977. *A Sand County Almanac*. Ballantine Books, New York.
- Leopold, A. S., S. A. Cain, I. N. Gabrielson, C. M. Cottam, and T. L. Kimball. 1964. *Leopold Report: Predator and Rodent Control in the United States: Report submitted to Department of Interior*.
- Littin, K. E. and D. J. Mellor. 2005. Strategic animal welfare issues: ethical and animal welfare issues arising from the killing of wildlife for disease control and environmental reasons. *Revue Scientifique Et Technique-Office International Des Epizooties* 24:767-782.
- Logan, K. A. and L. L. Sweanor. 2001. *Desert puma: evolutionary ecology and conservation of an enduring carnivore*. Island Press, Washington, DC.
- Mason, G. and K. E. Littin. 2003. The humaneness of rodent pest control. *Animal Welfare* 12:1-37.
- Mezquida, E. T., S. J. Slater, and C. W. Benkman. 2006. Sage-Grouse and indirect interactions: Potential implications of coyote control on Sage-Grouse populations. *Condor* 108:747-759.
- Mitchell, B. R., M. M. Jaeger, and R. H. Barrett. 2004. Coyote depredation management: current methods and research needs. *Wildlife Society Bulletin* 32:1209-1218.
- Muth, R. M., R. R. Zwick, M. E. Mather, J. F. Organ, J. J. Daigle, and S. A. Jonker. 2006. Unnecessary source of pain and suffering or necessary management tool: Attitudes of conservation professionals toward outlawing leghold traps. *Wildlife Society Bulletin* 34:706-715.
- Ripple, W. J. and R. L. Beschta. 2006. Linking a cougar decline, trophic cascade, and catastrophic regime shift in Zion National Par. *Biological Conservation* 133:397-408.
- Robinson, M. J. 2005. *Predatory Bureaucracy: The Extermination of Wolves and Transformation of the West*. University Press of Colorado, Boulder.
- Smith, D. W., P. O. Rolf, and D. B. Houston. 2003. Yellowstone after Wolves. *Bioscience* 53:330-340.
- Stolzenburg, W. 2006. Us or Them. *Conservation in Practice* 7:14-21.
- Treves, A. and K. U. Karanth. 2003. Human-carnivore conflict and perspectives on carnivore management worldwide. *Conservation Biology* 17:1491-1499.
- U.S. Department of Agriculture - Animal and Plant Health Inspection Service - Animal Damage Control. 1994. *Final Environmental Impact Statement*.
- U.S. Department of Agriculture - Animal and Plant Health Inspection Service - Wildlife Services. 2002. *USDA Performance and Accountability Report for FY 2002*.
- U.S. Department of Agriculture - National Agricultural Statistics Service. 2005a. *Cattle*.
- U.S. Department of Agriculture - National Agricultural Statistics Service. 2005b. *Sheep*.
- U.S. Department of Agriculture - National Agricultural Statistics Service. 2005c. *Sheep and Goats Death Loss*.
- U.S. Department of Agriculture - Office of Inspector General. 2004. *Audit Report: Animal and Plant Health Inspection Service, Wildlife Services' Controls Over Hazardous Materials Inventory*.
- U.S. Department of Agriculture - Office of Inspector General. 2006. *Audit Report: Animal and Plant Health Inspection Service, Evaluation of the Implementation of the Select Agent or Toxin Regulations, Phase II. Report No. 33601-3-AT*.
- U.S. Department of Interior-Bureau of Land Management. October 2004. *Proposed Revisions to Grazing Regulations for the Public Lands: Final Environmental Impact Statement FES 04-39*.
- U.S. Department of the Interior - Fish and Wildlife Service and U.S. Department of Commerce -U.S. Census Bureau. November 2007. *2006 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*.
- U.S. Department of the Interior, Fish and Wildlife Service, U. S. Department of Commerce, Census Bureau. 2001 *National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*.
- U.S. General Accounting Office. Nov. 2001. *Wildlife Services Program: Information on Activities to Manage Wildlife Damage*. GAO, Washington, D.C.
- USDA NASS Colorado Field Office. July 2007. *Colorado Agricultural Statistics 2007*.