

# War on Wildlife

A Report on the U.S. Department of Agriculture's "Wildlife Services" Program

REVISED JANUARY 2017





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wild matters



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## INTRODUCTION

Killed: 284 cougars, 384 gray wolves, 480 black bears, 731 bobcats, 1,511 gray foxes, 1,534 red foxes, 69,905 coyotes, and one critically endangered Mexican wolf.<sup>1</sup> This is but a portion of the 2015 reported death toll wrought by the federal government's Wildlife Services program in its unrelenting war on America's native wildlife. These native carnivores were all killed at taxpayer expense by a program shrouded in secrecy and hidden from the public spotlight; a program that executes our essential native animals in our own backyards for the purported benefit of a vocal minority of anti-carnivore and agribusiness interests. A program that is unsupported by science and continues to implement cruel and archaic means of wildlife 'management', including trapping, poisoning and aerial gunning, and is better left for the history books. Since 2012, more than 6.6 million native animals have fallen victim to Wildlife Services' secretive federal killing program.<sup>2</sup> It is long past time that this program's unjustifiable and cruel War on Wildlife comes to an end.





The program's focus should shift to the critical work of addressing threats to native species and ecosystems posed by non-native invasive species.

Wildlife Services must adopt a non-lethal framework for managing all wildlife on our public lands. The program can and should be a leader in the dissemination of the best available science and most effective non-lethal wildlife management techniques. The program's focus should shift to the critical work of addressing threats to native species and ecosystems posed by non-native invasive species.<sup>3</sup>

This report includes a brief history of the forces underlying our federal government's little-known "animal damage control" program, inaptly called "Wildlife Services." A short description follows detailing the toll this assault takes on native carnivores and other keystone species and the key roles these species play in maintaining healthy balanced ecosystems. The next section provides information on select killing tools Wildlife Services uses to slaughter millions of native animals each year.

The report also explains the science demonstrating that killing is not an effective solution to human-wildlife conflict, and makes the case for the use of non-lethal predator damage control techniques. Finally, we conclude with basic recommendations for reforming this rogue federal program.



# HISTORY OF THE WILDLIFE SERVICES PROGRAM


## Program Inception & Evolution

Wildlife Services is a program under the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) designed to “provide Federal leadership in managing problems caused by wildlife.”<sup>4</sup> The program’s mission statement provides much insight into the manner in which Wildlife Services has long viewed its responsibilities: wildlife is a “problem.” However, many of the “problems” the program claims to address are not caused by wildlife or are not remedied by the tools employed by Wildlife Services. In many instances, non-lethal management tools are proven effective, yet not emphasized or implemented by the program. Some of the tools employed by Wildlife Services actually worsen the problems it claims to be addressing.

While federal wildlife killing dates back to the late 19th century, the policy became formally institutionalized with the passage of the Animal Damage Control Act (hereafter referred to as the Act) in 1931. The Act’s original authorizing principles directed the program to deploy “the best methods of eradication, suppression, or bringing under control . . . mountain lions, wolves, coyotes, bobcats, prairie dogs, gophers, ground squirrels, jack rabbits, brown tree snakes, and other animals injurious to agriculture . . . and to conduct campaigns for the destruction or control of such animals.”<sup>5</sup>

Historically, it was generally thought that carnivores were a nuisance at best, an evil threat at worst, and should therefore be killed at all costs. Indeed, past generations saw carnivores as direct competition for food and dominion over the landscape. Our federal and state governments even hired hunters and trappers, and paid bounties to citizens to eradicate wolves, coyotes, and bears from their native habitat. As a result of the scientifically baseless assault on our native carnivores, many of these species were nearly eliminated from the mountains and plains of the West by the 1930s. We are only now beginning to restore many of these critical populations. Still, attitudes within specific interest areas and geographies have not changed apace with the science or our nation’s evolving ethic of humane coexistence with wildlife.

Wildlife Services has become more sophisticated in its communications and its rhetoric, yet intolerance of native carnivores remains a core part of its culture. Although the program’s current



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enabling legislation hides its original directive under the auspices of a discretionary “program of wildlife services,”<sup>6</sup> Wildlife Services remains wedded to the more descriptive language of the original Act in carrying out its work. The program’s efforts are concentrated on eradicating, suppressing, and attempting to bring under control many of our nation’s most treasured native wild animals.

Despite repeated requests and suggestions for reform—such as the 1964 Leopold Report by Secretary of the Interior Stewart L. Udall’s Advisory Board on Wildlife and Game Management and supplemented by Secretary of the Interior C.B. Morton’s 1971 Cain Report—Wildlife Services continues its killing program without implementing modern science or ethical conceptions of appropriate treatment of native species.

### The Current Wildlife Services Program

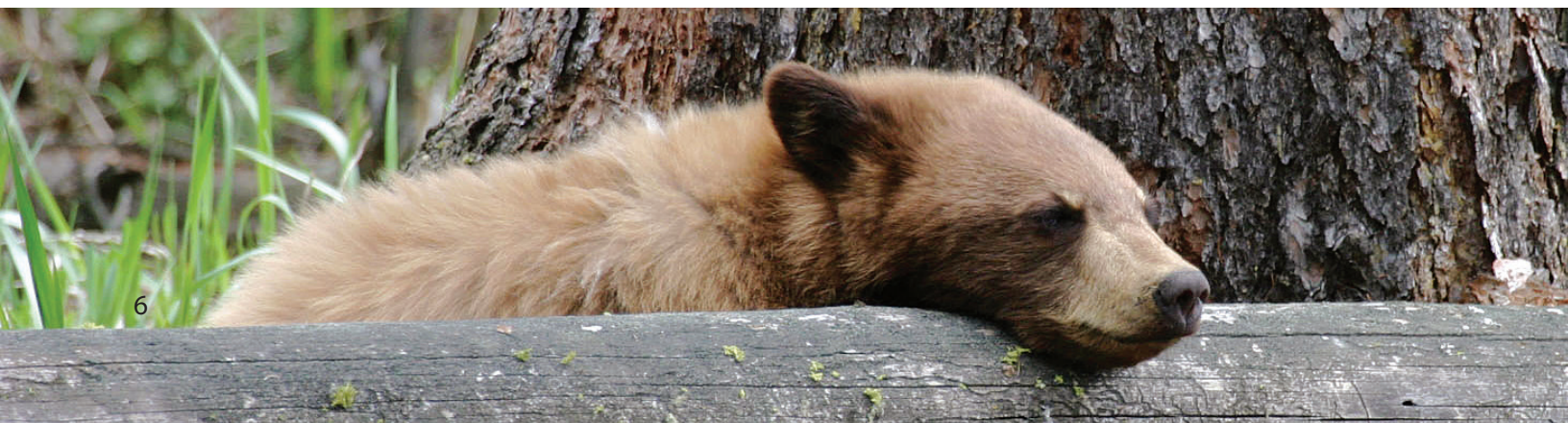
Today, Wildlife Services carries out its eradication, suppression, and control activities in all fifty states and U.S. territories.<sup>7</sup> Deploying a program of Integrated Wildlife Damage Management (IWDM), employees use their discretion to employ management techniques on a case-by-case basis. Although the IWDM approach appears reasonable on its face,<sup>8</sup> in practice, Wildlife Services interprets the policy in a manner that allows it to kill millions of native wild animals at the behest of private agribusiness and the anti-carnivore rhetoric of many states’ wildlife management agencies. Wildlife Services’ IWDM perpetuates the anti-carnivore mythology of the past.

Using a variety of methods—including gunning down animals from airplanes and helicopters, poisoning and suffocating mothers and babies in their dens, and setting a host of indiscriminate, barbaric and cruel traps and snares to catch and kill wild animals in their natural habitat—Wildlife Services most often sets out with an intention to kill. In 2015, the program reported killing over 1.6 million (1,681,283) native animals using its IWDM approach.<sup>9</sup> Given incredibly lax reporting and record keeping requirements and a longstanding “shoot, shovel and shut-up” mentality, the true death toll is likely far higher.

The efficacy of Wildlife Services’ work is haphazard at best, with many acclaimed scientists and researchers calling into question the program’s “sledgehammer approach” to wildlife management.<sup>10</sup> Not only is the scale of eradication biologically harmful and nonselective of the species killed, but it is also ineffective. A growing body of evidence shows that lethal carnivore control fails to effectively decrease attacks on livestock.<sup>11</sup> Thus it is becoming increasingly clear the moral and ecological costs of the program far outweigh the negligible economic benefits.

### Funding Sources & Clientele

Wildlife Services responds to requests for its animal damage control services from individuals, businesses, organizations, local and state governments, and other federal agencies, referred to as “cooperators.” The program operates on a budget funded by a combination of congressional appropriations and cooperator reimbursements. For example, in 2014, the last year currently disclosed, Wildlife Services’ budget was \$127,063,667, of which \$66,313,503 came directly from congressional appropriations and other federal funding sources and \$60,750,164 came in the form of reimbursement from the individuals or entities





... over 4,500  
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day.

requesting the services.<sup>12</sup> To put these numbers into perspective, in the period 2012-2014 alone, Wildlife Services spent over \$182 million dollars<sup>13</sup> of solely federal funds to kill over 4.9 million native animals. That amounts to over 4,500 native animals killed every day.<sup>14</sup>

Who benefits from our federal government spending these public dollars to kill millions of native animals? This extermination campaign is certainly not for the benefit of diverse American citizens, the vast majority of whom appreciate the wealth of wildlife that make our nation great. Instead, Wildlife Services is primarily working to benefit a handful of agricultural and livestock interests. The program responds to calls from farmers and ranchers who often refuse to implement non-lethal and common sense strategies to effectively coexist with native carnivores and other wildlife.

Additionally, counties and municipalities seek out Wildlife Services' assistance to manage alleged problem species, such as coyotes and prairie dogs. State and federal land and wildlife management agencies also request assistance from the program, in particular, concerning such activities as killing entire wolf packs deemed a threat or nuisance to some minority special interests (e.g., ranchers, deer and elk hunters). Regardless of the client, today's Wildlife Services program is no different than the one of the past, perpetuating the fallacious and scientifically disproven belief that native carnivores are enemy number one.

### Public Accountability

The program has a prolonged history of repeatedly failing, or at best severely delaying, responses to public information requests under the Freedom of Information Act (FOIA).<sup>15</sup> Chronically inadequate recordkeeping procedures and an ingrained mentality of "shoot-shovel-and-shut-up" are largely to blame for the program's entrenched lack of public accountability. The program likewise fails to properly account for its budget and federal taxpayer expenses.<sup>16</sup> Worse yet, the program fails to properly inventory, store, and control access to its stockpile of dangerous biological agents, putting the health and safety of the American public, companion animals and imperiled native wildlife at risk. For example, in 2002, the Office of the Inspector General found the program had lost 60 pounds of deadly strychnine-treated bait and over 2,000 lethal sodium cyanide capsules.<sup>17</sup> The program's utter disregard for safety and accountability must be reversed to ensure the health and wellbeing of people, wildlife and companion animals and the effectiveness of valuable federal expenditures draining from a limited budget.



A number of rare and imperiled species are also at home in the West, including Canada lynx, grizzly bears, and wolverines.



## ECOSYSTEM BENEFITS OF CARNIVORES & KEYSTONE SPECIES

### The West's Wildlife Heritage

America's western landscape is home to our nation's last remaining big, intact, and wild ecosystems. A host of native carnivores call the American West home, including gray wolves, coyotes, black bears, bobcats, cougars, and several species of foxes. A number of rare and imperiled species are also at home in the West, including Canada lynx, grizzly bears, and wolverines. Several prairie dog species, all considered "keystone species" due to their wide-ranging positive impacts on a host of other animals and their habitat, are key ecosystem engineers in the West's remaining native grasslands. These important carnivores and keystone species play essential roles in the health of our environment.

### Restoring Ecological Balance

Carnivores and other keystone species, like prairie dogs, play an essential role in maintaining healthy ecosystems. Predator species modulate prey populations and increase the health of those populations. The presence of carnivores and prairie dogs on the landscape increases the biological diversity and overall functionality of ecosystems. The mere presence of carnivores, like wolves, and the effects of predation ripple through the food web, influencing riparian systems and ecological health, in a biological phenomenon known as a "trophic cascade."<sup>18</sup>

The most famous example of a trophic cascade comes from the return of gray wolves to Yellowstone National Park where scientists documented the complex importance of restoring native carnivores to the landscape. By keeping ungulates on the move and their populations in check, the return of wolves to Yellowstone's habitats has dramatically improved the ability of plants, such as willow and aspen, to grow and flourish at healthy levels.<sup>19</sup> Beavers and songbird populations have also rebounded due to the increased health of riparian plant communities.<sup>20</sup>



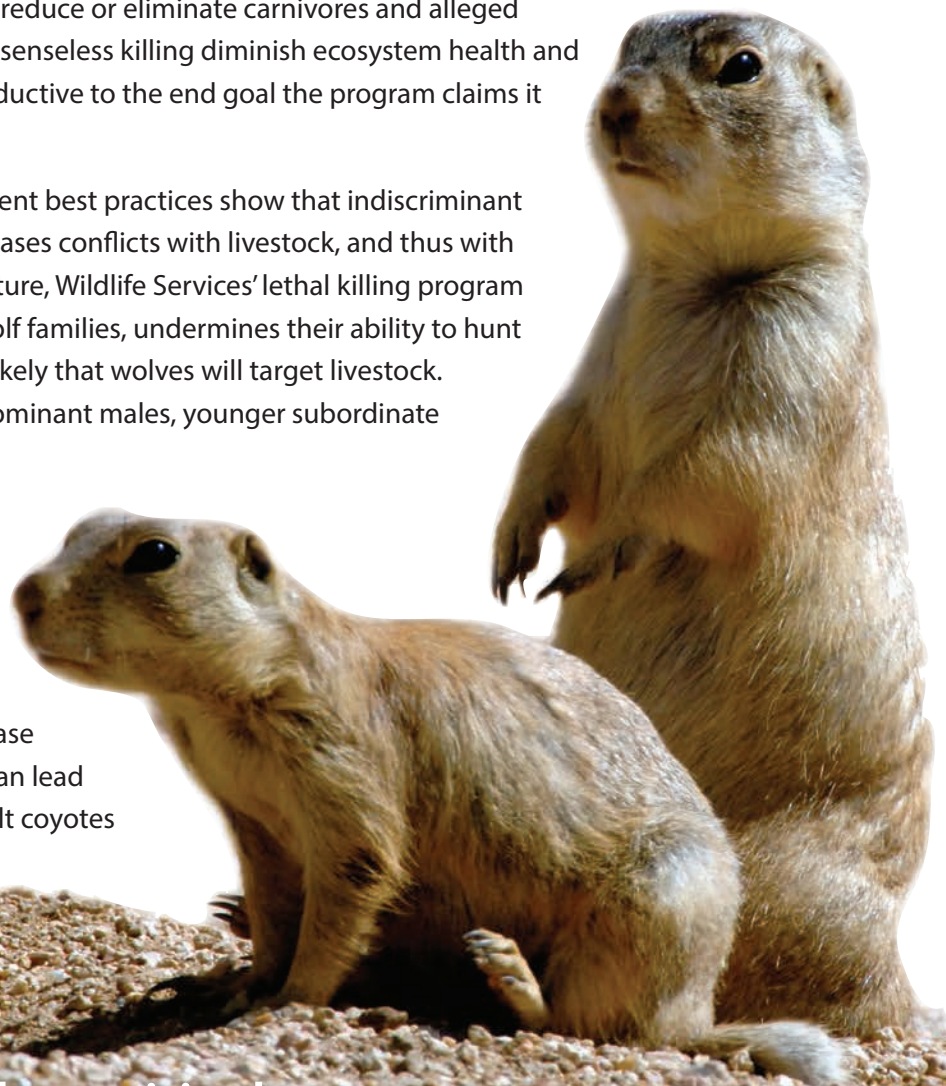
Mesopredator species, like coyotes, are also essential to maintaining ecological balance. Coyotes play a keystone role in the West's native ecosystems by preying upon smaller carnivores such as skunks, foxes, and raccoons.<sup>21</sup> This predation indirectly benefits the prey of smaller carnivores. For instance, the resulting decreased nest predation by smaller carnivores increases ground-nesting birds like the imperiled greater sage grouse.<sup>22</sup> Coyotes also increase the diversity of rodent species by increasing the competition amongst smaller carnivores.<sup>23</sup>

Keystone species like prairie dogs are also vital ecosystem engineers. The four species of prairie dogs in the United States—black-tailed, white-tailed, Gunnison's, and Utah prairie dogs—have unique, transformative effects on grassland ecosystems that are disproportionately large relative to their abundance. These social, burrowing mammals fertilize and aerate the soil and clip forage, creating shorter but more nutrient-rich plants. Large native herbivores including elk, pronghorn, bison as well as cattle often prefer to graze on prairie dog towns. Their burrows provide homes and shelter for numerous mammals, birds, reptiles, amphibians, and invertebrates. Prairie dogs are also an important food source for a wide variety of species, from hawks and eagles, to coyotes, badgers, bobcats, foxes, and critically imperiled black-footed ferrets.

In short, carnivores and keystone species like prairie dogs increase the richness and complexity of animal life and contribute to enhanced ecosystem functions. Despite these benefits, Wildlife Services spends millions of dollars annually to reduce or eliminate carnivores and alleged "nuisance species." Not only does this senseless killing diminish ecosystem health and biodiversity, it is actually counter-productive to the end goal the program claims it is seeking to achieve.

Sound science and wildlife management best practices show that indiscriminant killing of native carnivores often increases conflicts with livestock, and thus with humans.<sup>24</sup> By destabilizing pack structure, Wildlife Services' lethal killing program disrupts the natural functioning of wolf families, undermines their ability to hunt their native prey, and makes it more likely that wolves will target livestock. When cougars are killed, especially dominant males, younger subordinate males opportunistically expand their territories, which invites increased human-wildlife conflict.

Indiscriminate killing of coyotes similarly disrupts their natural population control, triggering compensatory breeding and an increase in the coyote population.<sup>25</sup> This too can lead to an increase in conflict.<sup>26</sup> Killing adult coyotes



**Keystone species like prairie dogs  
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upsets the stability and equilibrium of their pack structure. The result is that younger pairs begin to breed and juvenile males move in to fill the gap. Increasing the number of juvenile males in a destabilized population results in more breeding and increases the likelihood of predation on wild ungulates and on livestock, which in turn increases human-wildlife conflict.

Indiscriminate killing of wolves, coyotes, cougars and other carnivores is not a biologically sound or effective means to control or manage predation. The science is clear. Instead of recognizing the development in our understanding of native carnivores and adjusting its activities accordingly, Wildlife Services continues to obstinately refuse to evolve.

### A Major Cause of Conflict

In the American West, public lands grazing is the major source of many anthropogenic conflicts Wildlife Services purports to solve. Grazing of domestic livestock is the most widespread extractive use of our federal public lands. Grazing occurs on over 150 million acres of our public lands administered by the Bureau of Land Management (63% of the public land BLM manages).<sup>27</sup> The USDA Forest Service issues over 8,000 public lands grazing permits.<sup>28</sup> Yet, meat from public land forage is only a tiny fraction (about 2%) of national meat production.<sup>29</sup> Even half of the congressionally-designated wilderness areas within national forest boundaries—among the wildest places remaining in the United States and deemed worthy of added protection—allow some livestock use. The proportion is likely higher in designated wilderness areas managed by the BLM. Rural western communities often strongly identify themselves as ranching communities no matter how little ranching contributes to the local economy, leading them to oppose any movement to retire or restrict grazing on national forests and other public lands. These same communities are often those most reliant on cooperative agreements with Wildlife Services.

Grazing damages entire landscapes, displaces native species, degrades habitat necessary for imperiled species recovery, and is a major source of non-point source water pollution. Grazing is listed as a contributing factor in the decline of many imperiled species protected by the federal Endangered Species Act.

Moreover, and most relevant to the issue of Wildlife Services, domestic livestock grazing causes conflicts with native carnivores on public lands. The voluntary retirement of grazing allotments on our public lands will steadily and significantly reduce the purported need for Wildlife Services' activities. Instead of funding the extermination of native wildlife to support marginal private livestock businesses on our public lands, our federal government should be devoting its funds to first resolving the true source of conflict: public lands grazing.



## WILDLIFE SERVICES' KILLING PROGRAM

### Lethal Control Continues to Dominate

Despite the valuable and essential role carnivores and keystone species play in our natural ecosystems, Wildlife Services continues to implement a program of ruthless extermination. In 2015, Wildlife Services killed 284 cougars, 384 gray wolves, 480 black bears, 731 bobcats, 1,511 gray foxes, 1,534 red foxes, 69,905 coyotes, and one critically endangered Mexican wolf.<sup>30</sup> Also in 2015, the program directly killed 20,777 prairie dogs (black-tailed, Gunnison's, and white-tailed) and destroyed 59,065 dens, resulting in untold numbers of slaughtered prairie dogs. Killing strategies deployed at taxpayer expense include shooting, trapping, and poisoning.

### Gunning

Wildlife Services kills thousands of animals per year with firearms. Not only do the program's employees carry out the killing on the ground, they also use helicopters and small aircraft to shoot animals from the sky, a tactic known as "aerial gunning." Aerial gunning is especially abhorrent considering the inhumaneness of the practice and lack of biological soundness of its intended goals. The low-flying aircraft often first harass target animals—such as coyotes, wolves, foxes, and bears—until the point of exhaustion. Then, hunters shoot the stressed animals from above. Animals are often not killed immediately, instead left wounded to die slow, painful deaths. This practice occurs on both private and public lands throughout the year.

Of added concern is the impact of this practice on non-target species living in the killing vicinity. The noise associated with the low-flying aircraft, punctuated by the piercing ring of repeated gunshots, can cause severe stress to both target and non-target animals.<sup>31</sup> Animals may expend vital energy attempting to flee the noise from the low-flying aircraft.<sup>32</sup> And, in combination with already harsh conditions—such as a tough, cold winter with low food supplies—the stress can impact an animal's chance for survival and negatively impact its reproductive capability.<sup>33</sup>

Additionally, lead poisoning from bullets continues to threaten birds and other scavenger species across the West.<sup>34</sup> These harms, combined with the sheer expense of deploying expensive aircraft

## ANIMALS UNDER ATTACK





## LETHAL CONTROL



and hired marksmen to carry out Wildlife Services' aerial gunning operations, make this tactic an especially reprehensible and unjustifiable killing strategy.

### Trapping

Wildlife Services continues to litter the western landscape with cruel and archaic traps. Traps are indiscriminate, meaning that the animals they catch cannot be selectively controlled beyond a certain size range. Threatened and endangered species and domestic dogs, can be accidentally injured, or even killed by traps set for a different animal.<sup>35</sup> People are also at risk.

The program deploys both restraining and killing traps. Restraining traps are intended to hold a target animal in place until the trapper arrives to kill the animal, which could be hours, days, or even weeks or more. Restraining traps can severely injure and kill animals outright as well. Animals can die of dehydration, starvation, or freeze to death. Killing traps, although designed to kill the targeted animal immediately, are not always immediately effective and instead can cause an animal to suffer a slow and painful death. Wildlife Services sets traps both terrestrially (above-ground) and underwater. Except in the few areas where prohibited, traps are placed on both private and public lands depending on the cooperator request.

### Poisoning

One of Wildlife Services' preferred lethal tools is the use of poisons and toxicants to kill animals of all types, including mammals, birds, and rodents. Among the long list of toxicants in Wildlife Services' poison toolbox are: anticoagulants, alpha-chloralose, sulfur dioxide, carbon dioxide, phosphine, cyanide gas, aluminum phosphide, avitrol, sodium cyanide (M-44s), sodium fluoroacetate (Compound 1080), DRC-1339, glyphosate, sodium nitrate/nitrite, strychnine, and zinc phosphide. These poisons are dispelled via baits or in gaseous form to kill millions of native animals across the country. Several of these poisons are known carcinogens. Several do not immediately dissipate; meaning that secondary poisoning of non-target animals is likely. Many of these poisons are so toxic that only federal agencies are allowed to use them.

### M-44s

M-44s are spring-loaded devices screwed into the ground and topped with baits to lure unsuspecting carnivores to bite. Once



the animal's teeth clench on the bait, a spring shoots a pellet of sodium cyanide into the animal's mouth. When cyanide mixes with moisture, it produces a deadly vapor, morphing into a hydrogen cyanide gas that is readily absorbed into the animal's lungs, often causing hemorrhaging and convulsions before death. Wildlife Services primarily targets coyotes and skunks with M-44s, however, numerous non-target species often take the bait and are killed as well, including bears, badgers, foxes, bobcats, hawks, and even domestic dogs. These cruel killing devices are also extremely dangerous to humans, including unsuspecting children.

### **Compound 1080**

Although banned in 1972 due to its egregiously dangerous qualities,<sup>36</sup> Compound 1080 made a return to Wildlife Services' lethal toolbox since the ban was lifted in the 1980s.<sup>37</sup> Compound 1080 is an odorless, colorless, tasteless, water-soluble toxin that is poisonous in even very small amounts. The toxicant causes a slow and painful death with symptoms leading up to death that include convulsions, heart blockage, respiratory failure, hallucination, pain and deep depression.<sup>38</sup> The poison is now generally used in a device called a Livestock Protection Collar, which is a necklace worn by stock, such as domestic sheep, containing a pouch of Compound 1080 that is released upon puncture by a predator's bite. Although intended to target specific animals in the act of predating, the collars present a multitude of dangers to the environment and health of the broader public because they can spill their contents, fall off and go missing, and because carcasses of animals killed by the deadly poison are often not properly disposed of as toxic hazardous waste, which can lead to secondary poisoning of scavenger species and the environment.

### **Denning**

Wildlife Services also uses deadly canisters consisting of sodium and potassium nitrates combined with sulfur and carbon, which explode to create a deadly mixture of poisonous fumes. The canisters are tossed into burrows and dens to asphyxiate and kill pups and adults in a practice known as "denning." Ground squirrels, woodchucks, prairie dogs, and pocket gophers, as well as coyotes, skunks, and foxes are the most often targeted species of these cruel killing bombs.

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M-44s, Compound 1080, and "denning" canisters highlight just a few of the many forms of poisons and toxicants Wildlife Services continues to deploy to kill our native wildlife. Despite the severe harms to the environment, people and non-target species, and the cruel nature of the deaths experienced by target and non-target species alike, poisons remain among Wildlife Services most oft-used lethal control tactics.

#### **By the Numbers: Wildlife Services' Killing Program Since 2009**

**2009:** 4,120,291 total (no invasive/native animal breakdown available)

**2010:** 5,008,928 total (no invasive/native animal breakdown available)

**2011:** 3,752,356 total (no invasive/native animal breakdown available)

**2012:** 3,352,378 total (1,586,932 native animals; 1,765,446 non-native animals)

**2013:** 4,378,456 total (2,041,616 native animals; 2,336,840 non-native animals)

**2014:** 2,713,570 total (1,313,101 native animals; 1,400,469 non-native animals)

**2015:** 3,206,238 total (1,681,283 native animals; 1,524,955 non-native animals)

**Note:** *Wildlife Services' lethal control program can be useful in controlling harmful non-native species, such as feral swine, European starlings, and brown tree snakes. Invasive, non-native species can out-compete native species and have severely detrimental impacts on natural ecosystem health and biodiversity. Thus, we focus on the native species proportion of Wildlife Services' death toll throughout this report. Importantly, Wildlife Services' program of lethal eradication of invasive, non-native species should be deployed in the most humane manner possible. Wildlife Services began delineating between native and non-native species in its kill reports in 2012.*



## PRIORITIZING AND NORMALIZING NON-LETHAL SOLUTIONS

It is long past time that Wildlife Services' policies and practices comport with the best available science and reflect the fact that killing is often a counterproductive strategy. The program must be reformed to require the use of the multiple and varying array of proven successful non-lethal wildlife management techniques currently available to Wildlife Services' and its cooperators. Lethal control has no place on our public lands and should only be implemented on private land in a very limited manner if multiple attempts with non-lethal methods have failed.

Adjusting livestock husbandry practices is a useful first step. Simply penning livestock, such as cattle and domestic sheep, during the calving and birthing seasons, or using a calving barn, allows livestock producers to keep a closer eye on their stock, provides a protective barrier, and reduces the likelihood that the birthing process itself attracts carnivores. Requiring the proper disposal of afterbirth and carcasses and deploying range riders and herding dogs are also common sense solutions that livestock producers seeking federal assistance should first be required to implement before any lethal means are deployed at the public's expense.

Electric fences, which can be solar-powered, and fladry (flags tied to ropes or fences), as well as the use of scaring devices, such as strobe lights and noisemakers, also should be among the first tools pulled from Wildlife Services' toolbox when responding to requests for services.

Unfortunately, as the killing statistics show, Wildlife Services has yet to adopt a culture of offering, let alone requiring, non-lethal tactics first. This is a critical flaw that hampers the program's ability to carry out its mission to provide leadership in managing conflicts between native wildlife and livestock. The time has come for the program to undergo a paradigm shift in how it resolves conflict between native wildlife and people and how public dollars are spent.



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## CONCLUSION & RECOMMENDATIONS

It is time for Wildlife Services' senseless war on our native wildlife to end. We call on the program to eliminate the use of cruel, inhumane, ineffective and disproven killing tools—including aerial gunning, trapping, snaring and poisoning—from its offered services. The program must reform its mindset, culture, and strategies to be a leader in advocating compassion and coexistence between humans and native wildlife. Non-lethal tactics should be further developed through increased research and funding, and cooperators should be required to deploy exclusively non-lethal techniques in conjunction with conflict management on public lands. Finally, our federal government must accept and recognize the essential role our native carnivores and keystone species play in the health of our shared environment.

### RECOMMENDATIONS FOR REFORM

#### Educate & Require Implementation of Non-Lethal Conflict Prevention

Wildlife Services must increase education and outreach regarding the effectiveness and implementation of non-lethal management techniques to control conflicts between native wildlife and domestic livestock, first and foremost. Non-lethal methods should be the only tools used on public lands. Documented proper use of non-lethal methodology should be a required precursor to provision of services offered by Wildlife Services' to requesting individuals and entities on private lands.

#### Use the Best Available Science

Wildlife Services must be a leader in deploying effective and ecologically sound wildlife management techniques by utilizing only the best available science in all of its decision making and service actions. This includes consideration of the best available science regarding the sociological dimensions of understanding and resolving human-wildlife conflicts.

#### Revise Wildlife Services' Programmatic Environmental Impact Statement

Wildlife Services must revise its woefully outdated and ineffective 1994 Programmatic Environmental Impact Statement (PEIS) and analyze the full environmental impacts of its actions at the programmatic level. The revision process must include adequate opportunity for public involvement and commenting and must incorporate the best available science regarding wildlife management and conflict prevention appropriate in today's society. Under a legal settlement with WildEarth Guardians, the program may no longer rely on the 1994 PEIS, but the program has not yet initiated a new programmatic analysis.



#### Adopt a Robust Accountability Regime

Wildlife Services must adopt a robust public accountability program, including developing and implementing an effective, program-wide recordkeeping regime. The program must adopt a policy of transparency and accountability to the public, including timely response to Freedom of Information Act requests, as well as timely posting of budgets and records to its website.



### **Prioritize Conservation of Imperiled Species and Their Habitats**

Wildlife Services must give priority consideration to imperiled species and their habitats. The benefit of the doubt must be given to imperiled native species in conflict situations. The program must deploy the best available science to maintain necessary biodiversity in critical habitats at all costs. In addition to ending all lethal control on public lands, the program must end its use of indiscriminate lethal control devices in the habitat of imperiled native species on private lands.

### **End Lethal Control Activities on Public Lands**

Wildlife Services must end all lethal control activities on public lands. Our public lands belong to all of us, and our public tax dollars must not be squandered at the behest of minority special interests hostile to native carnivores on our public landscapes. Likewise, Wildlife Services must not use public tax dollars to kill native species on private lands when imperiled species are present. Wildlife Services, along with other federal agencies and programs, must recognize it has a public trust responsibility in the management of native wildlife.

### **Return Wildlife Services to the Department of the Interior**

Wildlife Services must be removed from the USDA and transferred into the U.S. Department of the Interior. A fundamental conflict of interest presides over the program's services when its actions are driven by an agency beholden to protecting the nation's agricultural interests. The Department of the Interior is charged with protecting and managing the nation's natural resources, and management of the nation's wildlife rightfully falls within this mission.

### **Adopt a Policy Supporting Permanent Public Lands Grazing Permit Retirement**

Wildlife Services must solve the root of the problem it continually sets out to remedy: native wildlife conflicts with private domestic livestock grazing on our nation's public lands. The program should adopt a policy advocating for active and permanent voluntary retirement of grazing permits for allotments on public lands.



**"A thing is right when it tends to preserve the integrity,  
stability, and beauty of the biotic community.  
It is wrong when it tends otherwise."**

**~ALDO LEOPOLD**



## ENDNOTES

- <sup>1</sup> USDA, APHIS, Wildlife Services, Program Data Report G – 2015, Animals Dispersed/Killed [https://www.aphis.usda.gov/wildlife\\_damage/pdr/PDR-G\\_Report.php?fld=&fld\\_val](https://www.aphis.usda.gov/wildlife_damage/pdr/PDR-G_Report.php?fld=&fld_val) (last visited July 11, 2016). Of note, it is widely accepted that Wildlife Services dramatically underreports kill data. These numbers are considered an absolute minimum death toll. The true impact of the program is likely far greater.
- <sup>2</sup> USDA, APHIS, Wildlife Services, Program Data Report G (2012) (documenting 1,586,932 native animals killed); USDA, APHIS, Wildlife Services, Program Data Report G (2013) (documenting 2,041,616 native animals killed); USDA, APHIS, Wildlife Services, Program Data Report G (2014) (documenting 1,313,101 native animals killed); USDA, APHIS, Wildlife Services, Program Data Report G (2015) (documenting 1,681,283 native animals killed).
- <sup>3</sup> Wildlife Services also addresses public safety issues at airports by preventing airplane-bird collisions. The program should continue this important service with an emphasis on non-lethal deterrence of wildlife around airports.
- <sup>4</sup> U.S. Dep't of Agric., Animal & Plant Health Inspection Serv., WS Vision, Mission, and Goals, [https://www.aphis.usda.gov/wps/portal/aphis/ourfocus/wildlifedamage/sa\\_program\\_overview](https://www.aphis.usda.gov/wps/portal/aphis/ourfocus/wildlifedamage/sa_program_overview) (last updated June 5, 2015).
- <sup>5</sup> 7 U.S.C. § 426 (2013) (quoting pre-amendment text altered by Pub. L. 106-387 (2000)).
- <sup>6</sup> 7 U.S.C. § 426 (2013) (“The Secretary of Agriculture may conduct a program of wildlife services with respect to injurious animal species and take any action the Secretary considers necessary in conducting the program.”).
- <sup>7</sup> USDA, APHIS, Wildlife Services, Managing Wildlife Damage, Wildlife Services Operations and Research Accomplishments (April 2012), *available at* <https://www.aphis.usda.gov/wps/portal/aphis/ourfocus/wildlifedamage/> (last visited Dec. 23, 2015).
- <sup>8</sup> The IWDM program “encompasses the integration and application of all approved methods of prevention and management to reduce wildlife damage ... [and] may incorporate cultural practices, habitat modification, animal behavior management, local population reduction, or a combination of these approaches ... [based on consideration of] the damage and magnitude, geographic extent, duration, frequency, and likelihood of recurring damage. In addition, consideration is given to nontarget species, environmental conditions and impacts, social and legal factors, and relative costs of management options.” USDA, APHIS, WS Directive 2.105 (Mar. 1, 2004), *available at* [https://www.aphis.usda.gov/wildlife\\_damage/directives/2.105\\_ws\\_integrated\\_dm\\_prog.pdf](https://www.aphis.usda.gov/wildlife_damage/directives/2.105_ws_integrated_dm_prog.pdf).
- <sup>9</sup> USDA, APHIS, Wildlife Services, Program Data Report G – 2015, Animals Dispersed/Killed [https://www.aphis.usda.gov/wildlife\\_damage/pdr/PDR-G\\_Report.php?fld=&fld\\_val](https://www.aphis.usda.gov/wildlife_damage/pdr/PDR-G_Report.php?fld=&fld_val) (last visited July 11, 2016).
- <sup>10</sup> See e.g., A. Treves and K.U. Karanth, *Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide*, 17 *Conservation Bio.* 1491-1499 (2003); B.R. Miller, M.M. Jaeger, and R. H. Barrett, *Coyote Predation Management*, 32 *Wildlife Soc'y Bulletin* 1209-1218 (2004); W. Stolzenburg, *Us or Them*, 7 *Conservation in Practice* 14 (2006).
- <sup>11</sup> See e.g., A. Treves, M. Krofel, J. Mcmanus, *Predator control should not be a shot in the dark*. *Front. Ecol. Environ.* 14, 380–388 (2016). R. B. Wielgus, K. A. Peebles, *Effects of Wolf Mortality on Livestock Depredations*. *PLoS One*. 9, e113505 (2014). B. J. Bergstrom *et al.*, *License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function*. *Conserv. Lett.* 7, 131–142 (2013).
- <sup>12</sup> USDA, APHIS, Wildlife Services, Program Data Report A – 2014, Resource Category Listing of WS Operations Line Item (Including HPAl) Funding and Cooperative Funding [https://www.aphis.usda.gov/wildlife\\_damage/pdr/PDR-A\\_Report.php?fld=&fld\\_val](https://www.aphis.usda.gov/wildlife_damage/pdr/PDR-A_Report.php?fld=&fld_val) (last visited Sept. 7, 2016) (noting Wildlife Services received \$44,480,513 from Federal funding, \$21,832,990 from Federal Cooperative funding, and \$60,750,164 from Cooperative funding in fiscal year 2014).
- <sup>13</sup> Wildlife Services' spent \$182,039,436 from solely federal and federal cooperative funds from 2012 to 2014. See USDA, APHIS, Wildlife Services, Program Data Report A (2014) (\$66,313,503 from federal and federal cooperative funding); USDA, APHIS Wildlife Services, Program Data Report A (2013) (\$57,479,771 from federal and federal cooperative funding); USDA, APHIS, Wildlife Services, Program Data Report A (2012) (\$58,246,162 from federal and federal cooperative funding).
- <sup>14</sup> Wildlife Services' admitted killing 4,941,649 native animals from 2012 to 2014. See USDA, APHIS, Wildlife Services, Program Data Report G (2014) (1,313,101 native animals killed); USDA, APHIS Wildlife Services, Program Data Report G (2013) (2,041,616 native animals killed); USDA, APHIS, Wildlife Services, Program Data Report G (2012) (1,586,932 native animals killed).
- <sup>15</sup> For example, in November 2015, WildEarth Guardians submitted a FOIA request to Wildlife Services seeking information on the programs' cooperators across select western states. The program took over 8 months to respond with requested documents and some documents continue to trickle in as of August 2016. A prior FOIA request regarding the program's safety review of its aerial gunning tactics in July 2000 took over seven years to be received—long past the statutory 20-day deadline—and the response was incomplete with a major report missing and over 80 pages redacted.
- <sup>16</sup> As of January 2017, the program's 2015 budgetary information has yet to be released on the program's website.
- <sup>17</sup> U.S. Dep't of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, *USDA Performance and Accountability Report for FY 2002* (2002).



- <sup>18</sup> See e.g., D.G. Flagel, G.E. Belovsky, and D.E. Beyer, Jr., *Natural and Experimental Tests of Trophic Cascades: Gray Wolves and White-Tailed Deer in a Great Lakes Forest*, 180 *Oecologia* 1183–1194 (2016); W. J. Ripple et. al, *Trophic Cascades Among Wolves, Elk and Aspen on Yellowstone National Park's Northern Range*, 102 *J. Biological Conservation* 227–234 (2001).
- <sup>19</sup> R. L. Beschta and W. J. Ripple, *Riparian Vegetation Recovery in Yellowstone: The First Two Decades After Wolf Reintroduction*, 198 *J. Biological Conservation* 93–100 (2016).
- <sup>20</sup> *Id.*
- <sup>21</sup> K.R. Crooks and M.E. Soule, *Mesopredator Release and Avifaunal Extinctions in a Fragmented System*, 400 *J. Nature* 563–566 (1999); S. E. Henke and F. C. Bryant, *Effects of Coyote Removal of the Faunal Community in Western Texas*, 63 *J. Wildlife Mgmt.* 1066–1081 (1999).
- <sup>22</sup> E.T. Mezquida et. al, *Sage-Grouse and Indirect Interactions: Potential Implications of Coyote Control on Sage-Grouse Populations*, 108 *J. Condor* 747–759 (2006).
- <sup>23</sup> W. J. Ripple and R. L. Beschta, *Linking a Cougar Decline, Trophic Cascade, and Catastrophic Regime Shift in Zion National Park*, 133 *J. Biological Conservation* 397–408 (2006).
- <sup>24</sup> Robert B. Wielgus and Kaylie A. Peebles, *Effects of Wolf Mortality on Livestock Depredations*, 9 *PLoS ONE* e113505. Doi:10.1371/journal.pone.0113505 (2014).
- <sup>25</sup> See e.g., Letter from Dr. Robert Crabtree, Yellowstone Ecological Research Center (Revised Draft June 21, 2012), available at [http://www.predatordefense.org/docs/coyotes\\_letter\\_Dr\\_Crabtree\\_06-21-12.pdf](http://www.predatordefense.org/docs/coyotes_letter_Dr_Crabtree_06-21-12.pdf) (presenting research showing that indiscriminate killing of coyotes results in population booms with consequent increases in livestock and wild ungulate predation).
- <sup>26</sup> *Id.*
- <sup>27</sup> Bureau of Land Management, *Fact Sheet on the BLM's Management of Livestock Grazing*, last updated Oct. 21 2016, available at <https://www.blm.gov/wo/st/en/prog/grazing.html>
- <sup>28</sup> C. H. Vincent, 2008. *Grazing Fees: An Overview and Current Issues*. (CRS Report for Congress). Library of Congress, Congressional Research Service. Washington, DC: 2 (Mar. 10, 2008) (more than 9 million AUMs were under permit on Forest Service lands in FY 2005); GAO. 2005. *Livestock grazing: federal expenditures and receipts vary, depending on the agency and the purpose of the fee charged*. GAO-05-869. Government Accountability Office. Washington, DC: 75 (grazing is permitted on 92.9 million acres of Forest Service land).
- <sup>29</sup> [CITE]
- <sup>30</sup> USDA, APHIS, Wildlife Services, Program Data Report G (2015).
- <sup>31</sup> C.B. Pepper et. al, *A Review of the Effects of Aircraft Noise on Wildlife and Humans, Current Control Mechanisms, and the Need for Further Study*, 32 *J. Env'tl. Mgmt.* 418–432 (2003).
- <sup>32</sup> *Id.*
- <sup>33</sup> *Id.*
- <sup>34</sup> See e.g., N. H. Golden, S. E. Warner, and M. J. Coffey, *A Review and Assessment of Spent Lead Ammunition and Its Exposure and Effects to Scavenging Birds in the United States*, 237 *Reviews of Env'tl. Contamination & Toxicology* 123–191 (2016); D. Craighead and B. Bedrosian, *Blood Lead Levels of Common Ravens with Access to Big-game Offal*, 72 *J. Wildlife Mgmt.* 240–245 (2008).
- <sup>35</sup> In 2015, Wildlife Services reported that it accidentally killed 17 dogs as a result of its lethal operations. USDA, APHIS, Wildlife Services, Program Data Report G (2015).
- <sup>36</sup> Executive Order 11643, *Environmental Safeguards on Activities for Animal Damage Control on Federal Lands* (Feb. 8, 1972) (“It is the policy of the Federal Government to (1) restrict the use on Federal lands of chemical toxicants for the purpose of killing predatory animals or birds; (2) restrict the use on such lands of chemical toxicants which cause any secondary poisoning effects for the purpose of killing other mammals, birds, or reptiles; and (3) restrict the use of both such types of toxicants in any Federal programs of mammal or bird damage control that may be authorized by law. All such mammal or bird damage control programs shall be conducted in a manner which contributes to the maintenance of environmental quality, and to the conservation and protection, to the greatest degree possible, of the Nation’s wildlife resources, including predatory animals.”).
- <sup>37</sup> Executive Order 12342, *Environmental Safeguards on Activities for Animal Damage Control on Federal Lands* (Jan. 27, 1982) (revoking Executive Order 11643).
- <sup>38</sup> C. Eason, *Sodium Monofluoroacetate (1080) Risk Assessment and Risk Communication*, 181 *J. Toxicology* 523–30 (2002).

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## MISSION

WILDEARTH GUARDIANS protects  
and restores the wildlife,  
wild places, wild rivers, and  
health of the American West.



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