

VIA FACSIMILE

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January 2, 2009

Dear Secretary of Agriculture nominee Vilsack:

We, the undersigned conservation, animal protection, ranching, and faith-based organizations, congratulate you on your nomination as Secretary of Agriculture. We look forward to working with you to protect the nation's environment, wildlife, and natural ecosystems. With that in mind, we encourage you to reform the Agriculture Department's wildlife "management" policies that for too long have focused on exterminating, rather than protecting, wildlife. **Specifically, we urge the Department to end Wildlife Service's aggressive and expansive lethal control of wildlife. Representatives from our coalition also request a meeting with you to discuss these issues in more detail.**

Every year, the Agriculture Department's Wildlife Services kills millions of animals, including thousands of native carnivores. The agency employs a host of cruel – and expensive and unnecessary – methods to kill coyotes, bears, cougars, wolves, and other wildlife. Animals are shot, poisoned, gassed in their dens, trapped, snared, clubbed, pursued by hounds, targeted from helicopters and planes, or lured to bait stations where they are shot. Other animals, even family dogs and cats, are unintentionally injured or killed by agency actions.¹ In 2007, alone, Wildlife Services killed 2.4 million animals, including 121,565 carnivores. The agency reported it spent over \$100 million in 2007 to kill wildlife, most of which was funded by taxpayers. Among those animals killed in 2007: 90,262 coyotes, 2,277 gray foxes, 2,412 red foxes, 2,090 bobcats, 1,133 cats, 552 dogs, 577 badgers, and 340 gray wolves.^{2 3}

The majority of wild animals are killed by Wildlife Services to appease agribusiness, even though non-lethal measures, such as the use of guard dogs and installation of proper fencing, are often effective in preventing conflicts. The agency also kills wildlife for such minor offenses as wandering onto private property, eating pet food, and digging in gardens. Yet, it is usually irresponsible human behavior that leads to conflicts with wildlife.

Wildlife Services utilizes methods that are non-selective, haphazard, and brutal, including:

Trapping/Snaring

Trapping may be the most inhumane method used by Wildlife Services. The most commonly used trap is the steel-jawed leghold trap, a restraining device with spring-loaded jaws that clamp on an animal's foot or leg when triggered. Traps can go unchecked for days during which animals may endure fractures, dislocation and/or amputation of limbs, dehydration, exposure to severe weather, self-mutilation and predation by other animals. Snares are designed to constrict as animals struggle against them, causing asphyxiation, but may instead cut off circulation in a limb. Traps and snares are notoriously indiscriminate. Non-target species found in traps include endangered wildlife, raptors, dogs, and cats.

Aerial gunning

Wildlife Services uses helicopters and fixed wing aircraft to shoot animals from the air. In 2007, the agency killed over 37,000 animals using aircraft. An agency Environmental Assessment revealed many wounded animals may be left to die.⁴ Because Wildlife Services uses snowfall to track coyotes in early spring, agents may kill pregnant or lactating females. Deaths of the latter leave pups to starve. Aerial gunning is also used for "preventative predator control," permitting

¹ Though such measures would normally be considered violations of cruelty to animal statutes, Wildlife Services agents are legally permitted to use an arsenal of inhumane methods to kill wildlife.

² http://www.aphis.usda.gov/wildlife_damage/annual%20tables/2007%20PDRs/Content/wp_c_ws_PDR_G_Piechart.shtml

³ <http://www.goagro.org/>

⁴ Environmental Assessment for Predator Damage Management in Eastern Colorado. 1999. 4-21. Colorado Wildlife Services. U.S. Department of Agriculture.

agents to shoot as many carnivores as they can prior to domestic animals entering an area. The price tag for shooting animals from the sky can be high: killing one coyote can cost \$1,000.⁵

Poisoning

Wildlife Services uses two toxins to kill predators: Sodium Monofluoroacetate (aka Compound 1080), a rat poison developed during World War II, and sodium cyanide. To distribute 1080, the agency uses Livestock Protection Collars – rubber bladders attached to the neck of a goat or sheep that, when pierced, releases 1080. 1080 is so lethal a single teaspoon can kill 100 people, and it is persistent in the environment. The agency also sets M-44 devices, spring-loaded, baited mechanisms that release sodium cyanide into the mouth of any animal who disturbs the device. Sodium cyanide and 1080 present serious national security risks. The FBI has listed both as “super poisons” that are “most likely to be used by terrorists or for malicious intent.”

Denning

Denning is the practice of tracking carnivores to their dens and then killing pups inside. Poisonous gas canisters are placed in dens to asphyxiate pups. Government agents dig pups out and shoot, club, or decapitate them. Pups have also been burned alive in their den.

Carnivores Contribute to Biological Diversity and Ecosystem Function

Wildlife Services’ lethal control programs ignore the importance of carnivores. As “keystone species,” carnivores play a pivotal role in sustaining ecological integrity and preserving species diversity. For example, large carnivores regulate deer and elk, as well as smaller mammal, populations. The disappearance of top carnivores triggers the loss of other species and the intricate connections among the remaining residents begin to unravel.⁶

Many non-lethal solutions are less expensive and more effective than killing. Ranchers who use guard dogs, llamas, burros, or even mixing cows with sheep report lower or no predation problems. Nighttime penning, penning during lambing and calving season, and removing animal carcasses from pastures also reduce conflicts. In addition, strobes and sirens are effective for preventing predation. Monies spent on lethal control would be better used to educate and aid ranchers, farmers, and others to upgrade their fencing or assist them with utilizing non-lethal techniques. Eliminating or reducing domestic animal grazing on public lands would also sharply reduce encounters with wildlife.⁷

Most Americans support conserving a diversity of native wildlife.^{8 9} The activities of Wildlife Services are out of step with those values. We urge you to end the agency’s lethal control programs. The public and its trust resources would be far better served by shifting Wildlife Services’ resources away from expansive killing of animals to providing public education about wildlife and employing non-lethal, humane measures to prevent conflicts. Such reforms would provide critical safeguards for communities and our nation’s wild heritage.

Thank you.

Sincerely,

⁵ <http://www.goagro.org/>

⁶ Crooks, Kevin, and Michael Soulé. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. *Nature*, 400: 563-566.

⁷ Andelt, W. F. 1996. Carnivores. Pages 133-155 in P. R. Krausman, editor. *Rangeland Wildlife*. Society for Range Management, Denver.

⁸ Kellert, S. and C. Smith. 2000. *Human Values Toward Large Mammals*. Ecology and management of large mammals in North America. Prentice Hall, Upper Saddle River, NJ.

⁹ Kellert, S. R. 1996. *The Value of Life*. Island Press, Washington, D.C.

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