TESTIMONY FROM RICARDO SMALL OREGON SENATE COMMITTEE ON ENVIRONMENT AND NATURAL RESOURCES

HB2182 (predator killing study by ODFW) and

HB3188A (predator killing districts to fund USDA's Wildlife Services)

May 27, 2015

FROM: Ricardo Small; 2650 NW Westminster Way; Albany, OR 97321-9379

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TO: Senator Chris Edwards, Committee Chairman

Senator Alan Olsen, Committee Vice Chairman

Senators Michael Dembrow, Floyd Prozanski and Chuck Thomsen - Members

My education includes a bachelor's degree and a master's degree in wildlife biology from the University of Arizona. My master's thesis title is *Interspecific Competition among Three Species of Carnivora on the Spider Ranch, Yavapai County, Arizona.* I worked at the Fort Huachuca (Arizona) Game Management Office as a civilian deputy game warden. I also worked as the executive secretary of the Arizona Wildlife Federation, an affiliate of the National Wildlife Federation. Most of my working career was as a real estate broker and appraiser in Tucson, Arizona. I retired in 2009 and moved to Oregon. I now volunteer as a photographer for non-profit organizations and Oregon Parks & Recreation. I am a member of several environmental groups and am active in environmental politics, both in Arizona during the winter and in Oregon during the summer. This testimony represents my opinions about both bills.

HB2182 (predator killing study by ODFW)

While ODFW's input should be part of a predator killing study, <u>ODFW should **not**</u> be the only <u>source of information</u>. More balanced and inclusive sources of information are essential to produce truly useful results. ODFW has an anti-predator bias that is likely to skew the results of the proposed study.

In the past, ODFW's Cougar Management Plan failed at scientific reliability. A predator expert, Dr. Robert Wielgus (Director, Large Carnivore Conservation Lab, Washington State University) asserted that the Cougar Management Plan as adopted by the Oregon Fish & Wildlife Commission lacked any scientific credibility.

Exhibit "A" starts on page 3 of 12 of this testimony - *Top Cougar Biologist Weighs in on Oregon's Cougar Management Plan* from Predator Defense, <u>www.predatordefense.org</u>, November 2010.

Given the history of ODFW's lack of objectivity regarding cougars, the proposed predator killing study in HB2182 should be expanded to include scientific information from people like Dr. Wielgus. That will enhance objectivity and help determine if predators should continue to be killed as a policy of the State of Oregon. If you decide to approve HB2182 and obtain a predator killing study, I think <u>Oregon's and/or Washington's universities should be included as sources of more credible scientific information</u>. Here's a link to Washington State's Large Carnivore Conservation Lab:

(http://environment.wsu.edu/facilities/carnivore/).

HB3188A (predator killing districts to fund USDA's Wildlife Services)

This bill proposes to allow formation of predator killing districts in Oregon. It would be a huge mistake. Testimony about HB3188A in the House revealed that the plan is to perpetuate and/or expand activities of the USDA's Wildlife Services by using property taxes, which this bill would create, to pay that agency to kill predators. This is NOT a policy that the State of Oregon should approve, particularly before results of the study about killing predators in HB2182. There is copious evidence of Wildlife Services crimes. Creating another source of funding for this killing agency should not become part of Oregon's policies. Wildlife Services is a Federal agency that should be abolished, not funded locally.

Here is a link to a video titled <u>EXPOSED - USDA's Secret War on Wildlife</u>. It is 31+ minutes long. Before you agree to allow the creation of additional funding for the USDA's Wildlife Services, I hope you will watch this video. It will change your mind about voting for HB3188A: https://www.youtube.com/watch?v=qSV8pRLkdKI.

Three former federal agents and Representative Peter DeFazio blow the whistle on the USDA's barbaric and wasteful war on wildlife in the video. Jane Goodall gave "EXPOSED" a rave review, saying she wants millions to see it. It won the Best Short at the 2015 Animal Film Festival and Best Wildlife Activism at the 2014 Wildlife Conservation Film Festival.

Exhibit "B" in this testimony's page 7 of 12 shows excerpts from the federal agents' and Oregon's Representative DeFazio's statements in the film.

A written report titled *War on Wildlife - The U.S. Department of Agriculture's* "Wildlife Services" by Wendy Keefover Ring of WildEarth Guardians is dated February 2009 and contains 108 pages. Here is a link to the full report:

 $\underline{http://www.wildearthguardians.org/support_docs/Publication_War_on\%20Wildlife_report_FINAL_highres.pdf$

Pages 8 and 9 herein contain Exhibit "C", which is an executive summary of the War on Wildlife. The report demonstrates that Wildlife Services is a national security threat due to hazardous practices. Wildlife Services has a dismal history of compliance with laws limiting the use of poisons and other lethal devices and practices that not only kill wildlife, but also kill pets, like the dog in this photograph, who was recently killed in Eugene:



Exhibit "D" starts on page 10 of 12 and provides additional information about the slaughter of predators. The State of Oregon should be working to stop such unscientific killing. We should not pass a bill to increase funding for the USDA's Wildlife Services.

Before you vote to provide more funding to continue the slaughter of predators in Oregon, I hope you will consider the information I provided and then vote "no" on HB3188A.

EXHIBIT "A"

Top Cougar Biologist Weighs in on Oregon's Cougar Management Plan

Posted by Predator Defense, www.predatordefense.org, November 2010

In his report on the Oregon Cougar Management Plan, Dr. Robert Wielgus, Director of the Large Carnivore Conservation Lab at Washington State University, asserted that the Plan, adopted by the Oregon Fish and Wildlife Commission in April 2006, lacks any scientific credibility. He contends that the authors must go back to the drawing board and begin again. "The authors should consult with reputable wildlife scientists and statisticians to obtain a reliable experimental design, analysis, and report. We recommend they consult with Scientists at Oregon State University, University of Oregon, or another research university to design a scientifically credible study."

Further, he contends that no valid scientific conclusions supporting the beneficial effects of administrative removal of cougars can be drawn from this study. There was no scientific evidence presented that administrative removals achieved any of the stated goals (reduced complaints, livestock depredations, and increased number of elk calves). In March 2010, Dr. Robert Wielgus submitted detailed comments on the Plan. They are printed in their entirety following the introduction immediately below.

In 2009, the Oregon State legislature imposed a note on the Oregon Department of Fish and Wildlife (ODFW) budget requesting a peer reviewed report following the third year of the Five Year Cougar Management Plan. The note specifically asked that the Washington State University Lab be included in the review. It is not surprising that the peer review was extremely selective including only state departments of wildlife, and no other independent scientists apart from the Washington State University lab. Scientists who were highly critical of the Plan in 2005 were not asked to participate in this review.

Representative Peter Buckley spoke in support of Dr. Wielgus' comments at the September 2010 hearing on the report held by the House Agriculture and Natural Resources Committee, voicing his concerns that management be driven by the best available science and not by politics and special interests.

Dr. Wielgus' comments support those made by well-known cougar biologists during the comment period when the Cougar Plan was first introduced in 2005. The Fish and Wildlife Commission chose to ignore scientific concerns and criticisms of the Plan's population model and methodology, and unanimously approved it. Sadly, the Plan has succeeded in its single focus: to increase cougar killing as much as possible.

It is ironic that the purported purpose of the Plan is to increase public safety for two reasons. First, the current target areas, all in remote eastern Oregon, are intended exclusively to kill more cougars in an effort to assist deer and elk hunters by removing competition from cougars and to assist livestock growers using public and private land. Secondly, research studies in Washington have shown that increased cougar removal/killing actually exacerbates risk to the public by creating an unnatural number of juvenile cougars in the population. Juveniles have been shown to be the age class most frequently involved in conflicts with people. Although there has never been a documented attack on a person by a cougar in the state of Oregon, the ODFW may be pushing its luck by continuing to manage cougars in a manner that science has found increases cougar-human conflicts. This management strategy puts public safety at risk in favor of deer and elk hunting and livestock production.

The Oregon Cougar Management Plan is up for review in April 2011.

Review of Oregon Department of Fish and Wildlife "Evaluation of cougar removal on human safety concerns, livestock damage complaints, and elk: calf ratios in Oregon"

Dr. Robert B. Wielgus, Director – Large Carnivore Conservation Lab, Dept. Natural Resource Sciences, Washington State University, Pullman, WA 99164-6410

Unfortunately, this document [the Oregon Cougar Management Plan] and the resulting management recommendations contain a number of very serious errors.

Design: The scientific design of the study was seriously flawed – there were no replications of treatments and controls and no accounting for competing hypotheses. The questions asked (effects of administrative removals on complaints, livestock depredations, and predation on elk) could not be effectively answered with this design.

That is extremely unfortunate, because the sample size of 3 study areas (3 areas with administrative removals and 3 adjacent areas without removals) could easily have been adapted to provide 3 replicate treatments and controls for each question.

Analyses: The analyses were almost entirely descriptive in nature – there was little or no use of statistical hypothesis testing to provide reliable tests and conclusions. That is also extremely unfortunate – because I easily conducted such tests on much of the data. My simple statistical tests refuted almost all of the descriptive conclusions based in this report. **Reporting:** The claims made in this report seem to be based on pre-determined beliefs and philosophical positions – not scientific evidence. I have published (see literature cited) and reviewed numerous peer reviewed papers on cougars in scientific journals. I can say without a doubt, that these results would never be acceptable in a peer-reviewed journal. My detailed comments follow.

Introduction

- 1.) **Page 2 para 5.** The statewide cougar population (including area sub-populations) is estimated as 5,101 based on a model from Keister and Van Dyke (2002). The modeled estimates for each area must be verified by empirical data and this was not done here. The estimates for these treatment and control areas have no scientific validity because of this lack of verification. See point 4.
- 2.) **Page 3**, **para 1**. cougar depredation removals increased from 23.4/yr (pre ballot initiative) to 116.9/yr (post ballot initiative). This may correspond to the socio-political fallout from the ballot initiative not increased numbers of cougars as implied here (same as occurred in WA). The jump in total cougar removals from 75 in 1995 to 123 in 1996 implies a cougar population increase of 64% in 1 year a biological impossibility.
- 3.) *Page 4, para 4.* These citations (except for Harrison 1989 and Hayes 2000) are all unpublished, un-peer reviewed grey literature and cannot be relied upon.
- 4.) *Page 5, para 4.* Estimates of cougar density were based on zone specific population models. Were the modeled estimates ever verified? Were they tested against real data? Are they reliable? What were the estimated densities? How do they compare with published estimates? Were they published? For example, on Page 20, para 4 the authors estimate 15 adult and subadult cougars /100 mi2 (5.8 cougars/km2) in their Heppner study area compared to 1.58 and 1.87 adult and subadult cougars/100 km2 at carrying capacity K in 2 of our WA study areas (Cooley et al. 2009a). That is a whopping 3 fold increase over our peer-reviewed published estimates and corresponds to the 3 fold overestimate we documented for traditional methods. I don't believe these estimates are realistic see point 9.
- 5.) *Page 6, para 2.* It was "assumed" that the cougar removals would not significantly reduce the cougar populations in each zone. This 1st assumption was based on the 2nd assumption that <14% of cougars in any zone are harvested, and this was based on the 3rd assumption that the population density estimates were correct.

This line of reasoning is like a house of cards; unproven assumptions piled one upon the other. All the target mortality objectives and related experimental conclusions are simply opinions and guesses. Real data, based on studies of population demography, such as done by my team in 3 areas of WA (Lambert et al. 2006, Robinson et al. 2008, Cooley et al. 2009a, Cooley et al. 2009b, Maletzke et al. 2010a,b) are required. This cannot be overstated; real, area-specific, scientific data are needed to conduct reliable experiments, the use of un-tested assumptions and conjecture are simply unjustifiable.

Jackson County Target Area (cougar-human conflicts)

- 6.) *Page 8, para 1.* The control area is said to have similar habitats, cougar populations, and human populations. Where are the data? County records should provide human and livestock densities, GIS maps should provide habitat composition, cougar demography should provide cougar densities. Why are these data not reported or available?
 7.) *Page 8, para 4.* The descriptive results in the beginning of the paragraph imply that administrative removals resulted in
- reduced **control kills** and are reported as effective for reducing conflicts on page 13, para 4. I conducted a simple ANOVA using area and year (pre & post removal) as independent variables and control kills as the dependent variable. There was NO EFFECT for year (N = 12 kills, F = 1.09, P = 0.327) and there was NO EFFECT for an area by year interaction (F = 0.12, P = 0.737) on number of control kills. There was an area effect (F = 43.75, P = 0.000) on number of control kills. For unknown reasons, there were more control kills in the treatment area, but administrative removals had NO EFFECT on control kills.
- 8.) Page 8, para 4 and 5. These descriptive results using the administrative removal period only (at the end of the paragraph) also imply that complaints were more numerous in the treatment area because of higher numbers and densities of cougars and that administrative removals reduced these complaints – however unlike the control kills, there were no pre and post removal comparisons! Why not? Were the complaint data not available pre-removal? That seems unlikely. Were the pre and post complaint data available – but not reported because they failed to support the assertion that administrative removals reduced complaints? Failing to include pre-removal data appears to be an attempt to elude the facts. At any rate, I conducted a simple t-test on numbers of annual complaints during the post-removal period using area as the independent variable. Mean annual number of complaints were marginally higher in the treatment area (N = 6yrs, annual complaints = 52 vs. 23, T = 2.6, at P = 0.06) but THERE ARE NO DATA TO SUGGEST THAT ADMINISTRATIVE REMOVALS REDUCED COMPLAINTS. Furthermore, so far as I know, there are no scientific data indicating that numbers of complaints and numbers and densities of cougars are positively related. Work in WA indicates that numbers of complaints are related to socio-political factors such as ballot initiatives and perceptions of cougars (Kertson 2005), and perhaps age structure. Younger animals use human-occupied areas more (Kertson 2010) and have higher encounter probabilities with humans than older animals (Maletzke et al 2010a) - but complaints are not related to numbers and densities of cougars (Lambert et al. 2006). Furthermore, high hunting mortality simply causes increased immigration by younger animals (Robinson et al. 2008, Cooley et al. 2009a, b).
- 9.) **Page 10, para 1.** ODFW was not able to achieve its target number of administrative removals ostensibly because land ownership patterns precluded effective hunting with hounds. An alternative explanation could be that the estimated numbers of cougars and targeted numbers of kills were inflated to begin with and that the expected number of kills could not be achieved at biologically realistic densities.

My research in WA indicates that traditional methods to estimate cougar numbers and densities (number of cougars captured or otherwise documented in a fixed study area) DOUBLE OR TRIPLE THE REAL NUMBERS AND DENSITIES because most cougars spend time outside the trapping area and actually inhabit a vastly larger area at much lower densities (Maletzke et al. 2010b). I suspect that failing to achieve the target number of kills may be due to over-estimates of the cougar population and subsequent over-exploitation of the same. Only real demographic studies can answer this question.

Beulah Target area (livestock depredations)

- 10.) *Page 13, para 1.* The descriptive results imply that cougar **depredation kills** were reduced because of administrative removals. I tested that assertion using the chi-square test of homogeneity with area (treatment and control) and years (pre and post-removal) as row and column factors and frequency of kills as the dependent variable. There was NO RELATIONSHIP BETWEEN FREQUENCY OF KILLS AND ADMINISTRATIVE REMOVALS (N = 41 kills, X2 = 1.07, P = 0.30). Administrative removals did not reduce the frequency of control kills.
- 11.) *Page 13, para 1*. The descriptive results also imply that **cougar complaints** were reduced because of administrative removals. I tested that assertion using the chi-square test of homogeneity with area (treatment and control) and years (pre and posttreatment) as row and column factors and frequency of complaints as the dependent variable. There was NO RELATIONSHIP BETWEEN FREQUENCY OF COMPLAINTS AND ADMINISTRATIVE REMOVALS (N = 33 complaints, X2 = 2.9, P = 0.08). Administrative removals did not reduce frequency of complaints.
- 12.) *Page 13, para 2 and 3*. These descriptive results on cougar mortalities (para 2) and deer fawns and numbers (para 3) use no statistical tests and are meaningless.
- 13.) *Page 13, para 4.* The authors state that these results provide evidence that administrative removals reduce cougar-livestock conflicts. But the statistical tests show that there is NO EVIDENCE that administrative removals reduce conflicts. Same goes for cougar complaints the authors state that removals reduced complaints but the tests showed they didn't! 14.) *Page 13, para 5.* The authors admit that fawn recruitment did not increase following removals but they suggest that deer increased because of removals. How did the deer increase? The authors suggest increased adult survival (without corresponding increased fawn survival?). That seems unlikely since fawns are more susceptible to predation than adults. Once again, there are no tests of adult or fawn survival or recruitment so these so-called results are just opinions or guesses. To their credit the authors indicate that real deer monitoring is required.

Heppner Target Area (elk predation)

- 15.) *Page 14, Table 5.* The drop in cow calf ratios following 2004 corresponds to high snowfall that year. The variability in cow calf ratios throughout the time series might be caused by immediate and time-lagged weather effects not by cougar predation. The variability in calf cow ratios could be caused by anything. A proper comparison and analysis of competing hypotheses (predation, weather, density dependence, interspecific competition, etc (see Robinson et al. 2002, Cooley et al. 2008, Keehner et al. 2010) would have to be conducted to determine likely causal factors of elk decline. This research also needs to be done over multiple years to account for environmental variability not just 1 year which as done here.
- 16.) *Page 15, para 3.* The increase in calf cow ratios in 2008 (not in 2006 when cougar removals began) could have been caused by anything. Competing hypotheses must be tested.
- 17.) *Page 16, para 2.* Deer did not respond to administrative removals. If elk did, why not deer? Deer usually comprise the primary prey of cougars and should show a stronger response than elk (White et al. 2010).
- 18.) *Page 17, para 1.* The authors claim that administrative removals "appears to have had the desired effect on elk calf ratio". But there is NO EVIDENCE TO BACK UP THIS STATEMENT. The authors then invoke a bunch of speculation involving 1.) snowfall, 2.) elk immigration, 3.) mysterious increase in deer survival, etc, etc to explain away any discrepancies from their cougar limitation theory. This is just making up stories and has no basis in evidence or science.
- 19.) **Pages 18-24.** Most of the discussion follows the same pattern: with wishful thinking, unsubstantiated belief, and philosophy not empirical science, guiding the discussion of the results and conclusions.

Summary

No valid scientific conclusions supporting the beneficial effects of administrative removals can be drawn from this study. There was no scientific evidence that administrative removals achieved any of the stated goals (reduced complaints, livestock depredations, and increased elk calves). The report lacks any scientific credibility. The authors must go back to the drawing board and begin again. The authors should consult with reputable wildlife scientists and statisticians to obtain a reliable experimental design, analysis, and report. We recommend they consult with Scientists at Oregon State University, University of Oregon, or another research university to design a scientifically credible study.

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EXHIBIT "B"

Meet the federal agents in the film titled **EXPOSED: USDA's Secret War on Wildlife**, which you can see here: https://www.youtube.com/watch?v=qSV8pRLkdKI



GARY STRADER, former police officer and Wildlife Services trapper. "Government employees shouldn't be breaking the law on the job. And the federal government should not be in the business of predator control on taxpayer dollars."



REX SHADDOX, former Wildlife Services trapper and special investigator for Wyoming Sting operation. "Poisons banned since the 1970s, that the official record said didn't exist, were being bought from the Wyoming Department of Ag. To sell to ranchers and predator boards."



DOUG MCKENNA, former special agent for U.S. Fish & Wildlife Law Enforcement. "It always seemed the words 'eagles, coyotes and wolves' led us to poisons, and led us to Wildlife Services."



REP. PETER DEFAZIO. "Wildlife Services is one of the most opaque and least accountable agencies I know of. It is not capable of reforming itself. They need a mandate for reform ... it's going to have to be imposed on them."

TESTIMONY FROM RICARDO SMALL Page 7 of 12

EXHIBIT "C"

War on Wildlife - The U.S. Department of Agriculture's "Wildlife Services"

Executive Summary

Wildlife Services, a branch of the U.S. Department of Agriculture was a major force in eliminating wolf and grizzly bear populations in the continental United States by 1940. Today, it spends over \$100 million annually to kill more than one million animals—primarily birds, and hundreds of thousands of mammals such as black and grizzly bears, beavers, mountain lions, coyotes, and wolves.

In 1994, Wildlife Services then called "Animal Damage Control," prepared a programmatic environmental impact statement (PEIS) under the National Environmental Policy Act (NEPA). In 1997, the agency reissued the document with some corrections, and to this day, Wildlife Services relies on this outdated PEIS. For this report, we reviewed the PEIS and some of the scientific literature that Wildlife Services has issued since 1994. While the major thrust of this report reveals the social, economic, and biological problems associated with eliminating large numbers of native carnivores such as coyotes, wolves, and bears, we also describe eleven biological agents used to kill species, and review the efficacy of trapping, and shooting wildlife from aircraft—a practice termed "aerial gunning."

Wildlife Services aerial guns, traps and snares animals, and broadcasts a panoply of dangerous toxicants—that harm a variety of taxa. Between 2004 and 2007, Wildlife Services killed 8,378,412 animals. The numbers of mammals in the kill has increased in recent years. In 2004, for instance, the agency killed 179,251 mammals compared with 207,341 in 2006. Wildlife Services has escalated the numbers of endangered species it killed in recent years for a total of 2,481 individuals, primarily gray wolves, since 1996.

Yet, Wildlife Services cannot count each poisoned individual. Many toxic bait sites go undocumented. Grizzly bears may trigger an M-44, a device that expels deadly sodium cyanide, only to die unnoticed in the wilderness. Numerous family dogs have been exposed to M-44s, as have people. Tens of thousands of birds, poisoned by DRC-1339, rain down from the sky forcing some homeowners to scoop them up with pitchforks. Because the toxicant can take three days to act, many birds are not found and included in the agency's statistics. Wildlife Services sprays pesticides from helicopters onto cattails in wetlands to reduce breeding sites for migratory blackbirds to benefit the sunflower industry. These treatments likely cause harm to wetland functionality, water quality, and wildlife habitats.

Why the slaughter? Biologists, economists, and federal oversight agencies have criticized the efficacy of Wildlife Services. Biologists have dubbed the agency's predator-control program the "sledgehammer approach" to wildlife management because of the breadth of extermination. Large-scale, predator-killing programs are unsustainable and environmentally harmful. Few livestock producers actually experience predator problems because most unintended cattle and sheep deaths come from birthing problems, disease, or weather, *but not* predation. An economic study shows that lamb prices, wages and hay costs, but rarely predators harm sheep producers. More ominous, several federal agencies determined that Wildlife Services' practices prove hazardous.

Wildlife Services presents a national security threat, according to federal oversight agencies. In a series of audits since 2001, the USDA's Office of Inspector General has sanctioned Wildlife Services for its unsafe handling of lethal biological agents, toxins that could be used in biological warfare. Particularly sodium cyanide and Compound 1080, both of which can be used in chemical warfare and are extremely toxic to humans.

In November 2007, Wildlife Services itself admitted that it had experienced a "wake of accidents" that involved its aerial gunning program, its hazardous chemicals inventory, and more. The aerial gunning program, for instance, caused ten fatalities and 28 injuries to federal employees and contractors. In March 2008, the Environmental Protection Agency issued a notice of warning letter to Wildlife Services for its illegal and unsafe placement of M- 44s that resulted in the injury of a U.S. Fish and Wildlife Service biologist and the death of his hunting dog.

Wildlife Services skirts around disclosure laws. For instance, in July 2000, WildEarth Guardians (formerly Sinapu) requested documents pursuant to the Freedom of Information Act concerning aircraft accidents. The response arrived October 2007—seven years late, and incomplete. A major report was missing and 82 of 400 pages were redacted. Wildlife Services finds federal disclosure laws inconvenient. Despite its public status and funding sources, Wildlife Services remains publicly unaccountable.

Most of Wildlife Services' budget comes from federal tax dollars, but states and counties also contribute. The agency receives funding from private cooperators such as the Woolgrowers Association and the Cattlemen's Association. This biologically and fiscally expensive program burdens taxpayers.

Wildlife Services massacres America's wildlife to benefit agribusiness. It argues that the government's role "in preventing and controlling damage caused by wildlife is sensible" because "wildlife belong in common to the country's citizens" (Chapter 3, p. 51). Yet taxpayers are unwittingly funding the death of hundreds of thousands of animals each year. Those deaths are conducted in ways that are harmful to the environment, the public, protected species, and family pets.

Viable non-lethal alternatives to using dangerous toxicants, traps, and aerial gunning are available but go unused. While practical and time-tested non-lethal aids are available to the livestock industry and farmers, the federal government neither heartily uses them, nor does it spend significant resources developing new ones. Wildlife Services is the wildlife equivalent of Blackwater, shooting first and deflecting questions later.

WildEarth Guardians does not believe that Wildlife Services is accountable to the public. Its mode of operation is anachronistic, reckless, and dangerous, and we call upon Congress to abolish this agency.

Exhibit "D"

http://blog.therainforestsite.com/killing-coyotes/

400,000 Coyotes Are Killed in the U.S. Each Year... The Reason Why Will Make You Livid

At least **400,000** coyotes are killed each year in the United States. That's an average of nearly **1,100** individuals a day.

So why isn't the government doing something to stop it? Well, mainly because they have been orchestrating a **discreet mass slaughter of coyotes** for nearly a century.



The <u>U.S. Department of Agriculture's Wildlife Services</u> specializes in <u>killing coyotes</u>. The agency sends helicopters with snipers to fly over coyote habitats and shoot them on-sight, with the intent of killing as many as possible. A government-paid airborne gunner working for the USDA will kill as many as 100 coyotes a day.

Elsewhere, hundreds of coyotes are shot by on-the-ground Wildlife Services agents, or killed in snares, or mortally injured in foot traps, or poisoned, or gassed, or bludgeoned to death. Altogether, the government kills at least **80,000 coyotes a year**, with the annual cost of **\$20 million**. That's taxpayer money. And it's been happening since 1931.

As for the other 320,000 annual coyote deaths, most are slain in predator killing contests across the U.S.

Who can shoot the largest coyote? Who can shoot the most? The winners get a prize: a couple hundred dollars, or a new assault rifle, and of course bragging rights.

Besides the chance to win a prize, what really motivates people to hunt coyotes so enthusiastically? Most people **don't eat coyote** meat. And in 2014 pelts were worth an average of only **\$65 each** — not especially lucrative.

The top reason given by coyote hunting proponents isn't food, or money — it's **population management**. These people, who voluntarily go on hunts specifically to kill coyotes, apparently believe that their motives are inherently noble, and reputable. Killing coyotes, according to the popular claim, protects livestock. It controls populations. It helps farmers and ranchers and the ecosystem as a whole. Or at least that's the claim. **The science disagrees**.



Coyotes are a predator species. They <u>tend to eat</u> small animals, like gophers and frogs. A pair or group of coyotes might go after a small deer in the winter, but will eat fruits and berries in the summer and fall. Livestock is not typically even on a coyote's menu.

Nearly 100 years since the national coyote killing campaign began, North America's wild dog is more prevalent than ever. That's because coyotes are uniquely adaptable. Killing them does not rid you of them. As hunters remove more and more coyotes from a habitat, the small mammal populations that make up their prey will increase. When food becomes more prevalent, coyotes can adapt by **increasing the size of their litter**.

In a seven-year study of coyote populations published in 2005, Eric Gese, of the USDA's Wildlife Services own research center, found that coyote culling <u>does not</u> facilitate population management of the species. Coyote-killing might actually result in the <u>opposite</u> of the intended effect.

By killing coyotes, hunters give an unnecessary foothold to species lower in the food chain, and nature responds by creating more coyotes to control those populations. Therefore, the go-to reason for coyote-killing is, in effect, a great reason **not** to kill them.

There are much more effective ways to live alongside coyotes that don't involve mass slaughter. By taking a more pragmatic approach, farmers and ranchers can show these hunters that killing is not the answer.

This Gift that Gives More helps teach farmers and ranchers a plethora of practices to peacefully coexist with predator species. With your help, we can reverse the war on coyotes.

Which brings us to the second-most common excuse for killing coyotes:

It's <u>"challenge."</u> It's <u>"something to do"</u> in the hunting off-season. It's <u>"fun."</u> This argument is more qualitative, and therefore not as readily disputable. Most will agree, however, that just because something is gratifying does not mean that it is right.

Marc Bekoff, one of the world's leading canid researchers, has observed that a coyote's **emotional reaction** to the death of a loved one isn't much different than a human's. Coyotes, like humans and many **other species**, experience grief and sadness after the loss of life.

While killing a coyote may be fun for the hunter, the death has very real consequences for the remaining population. Coyotes are social mammals, much like humans, and they need each other to live a happy and fulfilling life, and they hurt when someone takes that away. **Can something truly be considered "fun" if it hurts someone else?**

If there were a species with technology superior to ours, and that species were hunting us as we hunt coyotes, all would consider it an egregious atrocity that must be stopped. So why is it that we allow the indiscriminate slaughter of coyotes to continue?



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