

## **Action Alert!**

### **New Policy would Allow Poisons, Aircraft Landings, ATV's and Snowmobiles in Wilderness to "Control" Predators**

**Comments Due August 7<sup>th</sup>!**

*"One of the most insidious invasions of wilderness is via predator control"*  
-- Aldo Leopold, 1949

#### **The Proposal**

The Forest Service (USFS) is proposing to revise its national policies regarding predator control in designated wilderness. The changes would weaken the USFS' role regarding how and if predators should be killed to protect livestock or boost popular game species such as deer or elk. Decision-making authority would be turned over to the federal Wildlife Services program and to State Fish & Game agencies, neither of which have much understanding or concern for protecting wilderness values.

Under the new policy "predator control" wouldn't be limited to species typically targeted like coyotes, wolves, mountain lions or bears. It could also include the wholesale killing of ducks, cormorants or other birds that eat game fish, as is currently proposed in the West Sister Island Wilderness in Ohio!

The proposed policy is online at:

<http://a257.g.akamaitech.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/E6-8839.htm>

Comments must be **received in writing by August 7<sup>th</sup>, 2006**

SEND TO:

E-Mail: PDM@ fs.fed.us (must capitalize PDM)

Fax: 202-205-1145

Mail: Forest Service, USDA  
Attn: Director, Wilderness and Wild and Scenic Rivers Resources  
201 14<sup>th</sup> Street, SW  
Washington, DC 20250

### **Significant policy changes include:**

- Allows poison baits, including cyanide-filled M-44 devices, eliminating the USFS' long-standing policy prohibiting such use.
- Allows aircraft landings and use of motor vehicles in wilderness for predator control. Such motorized access represents a radical new shift in wilderness policy!
- Eliminates the criterion that lethal control can be authorized in wilderness only if it was taking place prior to wilderness designation
- Allows the killing of entire "local populations," thereby eliminating the current policy's focus on targeting only "the offending individual."
- Eliminates a current provision that requires case-by-case approval from the Regional Forester for any lethal control actions. The proposed policy would allow APHIS-WS, State fish and game managers, and unidentified private individuals to determine when lethal control should occur.
- Allows predator control as a tool to achieve State Fish & Game goals for popular game species.
- Allows unidentified "collaborative groups" to set predator control objectives for wilderness. This is a radical change from existing policy, and would enable livestock interests and other local interests traditionally hostile to predators to set predator control agendas.
- Eliminates the requirement that control must be "necessary." Instead, public health, threatened and endangered species, livestock protection, and game management goals are re-worded to be pro-active "objectives" of predator control.

### **Background**

According to the USFS, the changes will bring the policies into conformance with an agreement -- called a Memorandum of Understanding (MOU) -- signed in 2004 by the USFS and the Animal and Plant Health Inspection Service's Wildlife Services Division (APHIS-WS). APHIS is an agency within the Department of Agriculture. Wildlife Services is a program within APHIS and is responsible for the federal government's predator control program.

Control measures include leg-hold traps and snares, body-gripping suffocation traps, calling and shooting, aerial gunning, poison baits, cyanide poison devices called M-44's that forcibly release a cloud of cyanide crystals into the animal's mouth and lungs, and

denning which entails snaring pups on a sharp hook to pull them out of their den and then crushing their skulls.

Numerous non-target species are also killed annually because many of the lethal techniques are not species-specific. For example, bald eagles have been killed by poison baits and by leghold traps, and M-44's attract many species including bears, coyotes, wolves, dogs, and foxes. M-44's are also lethal for humans.

While most predator control in Wilderness to date has been done to protect domestic livestock, that is not the sole impetus for the new policy. State fish and game managers and some commercial hunting guides are increasingly calling for killing predators in order to artificially inflate big game herds (for example, the State of Idaho's Department of Fish & Game is proposing to kill more than two-thirds of the wolf packs in portions of the State). The end result of the new policy will be that even in those Wildernesses that are not grazed by domestic livestock, predators will be increasingly harassed and killed just for trying to survive and feed their young.

### **Comparing the Policies**

#### 1. What the current policy says about poisons:

Poison baits or cyanide guns are not acceptable. Poison bait collars may be approved.

#### What the proposed policy says:

Forest Service officers shall strongly discourage the use of poison baits, such as M-44 devices and livestock protection collars, except in specific cases where there is compelling evidence that other forms of predator damage management have proven to be ineffective.

The Regional Forester may authorize use of pesticides for predator damage management.

#### What the policies *should* say:

Poisons of any kind, including baits, M-44's, and livestock collars containing poison, are inappropriate in wilderness and are prohibited.

2. What the current policy says about aircraft and motor vehicles for predator control:

The landing of aircraft, use of ATV's, snowmobiles, motor vehicles and other means of mechanical transport have never been allowed in wilderness for predator control under past or current USFS policy.

What the proposed policy says:

Landing of aircraft and use of motorized equipment and mechanical transport to facilitate implementation of predator damage management activities in wilderness areas may be allowed if authorized by the Regional Forester upon a determination that these uses are necessary to meet minimum requirements for the administration of the area.

What the policies *should* say:

Landing of aircraft, motorized equipment, motor vehicles and other means of mechanical transport are not allowed for predator control activities in wilderness.

3. What the current policy says about pre-existing predator control:

Predator control is permitted in wilderness only when it was used prior to wilderness designation.

What the proposed policies say:

Removes the limitation on when predator control can occur.

What the policies *should* say:

Predator control is incompatible with the untrammeled character of wilderness as places where natural processes prevail. Control actions should be extremely rare in wilderness, and only approved upon written documentation of grave necessity.

4. What the current policy says about identifying the animals to be killed:

Focus control efforts on offending individuals and under conditions that ensure minimum disturbance to the wilderness resource and visitors.

What the proposed policy says:

Predator damage management control measures shall be directed at the offending animal *or local population* and shall not jeopardize the

continued viability of predator populations in the ecosystem (emphasis added).

What the policies *should* say:

Control efforts will be limited to the offending individual(s). Predator control projects will only be approved if strong evidence exists that removing the offending individual(s) will not diminish the wilderness character of the area.

5. What the current policy says about Forest Service decision-making authority regarding predator control:

The Regional Forester may approve predator control programs on a *case-by-case basis* where control is *necessary*.

What the proposed policy says:

The Forest Service recognizes that APHIS-WS and State agencies have authority and expertise to conduct predator damage management on national forest lands, including wilderness, and that APHIS-WS, State agencies and private individuals may perform predator damage management on national forest lands. The Forest Service shall coordinate and cooperate with States and private individuals when predator damage management is conducted *under State authority*.

NOTE: The proposed policy would alter the decision-making role of the USFS, suggesting that its only specified duty is to "participate" in the formation of annual "work plans", which presumably will contain programmatic authority for implementing predator control. The new policy dispenses with the cautious "case by case" approach. Thus predator control in wilderness, which currently requires targeting of an individual animal, will be transformed into a continuous program of dispersed killing of whatever number of predators may fall under the "objectives" that have been chosen by local collaborative groups and written into the work plan (see # 7 below).

What the policies *should* say:

Any proposed predator control activities in wilderness must be approved by the Regional Forester on a case-by-case basis.

6. What the current policy says about the criteria used in approving predator control:

Predator control may be approved if *necessary* to:

- a. Protect threatened or endangered species
- b. Protect public health and safety,
- c. Prevent serious losses of domestic livestock.

What the proposed policy says:

The objectives of predator damage management in wilderness are to:

- a. Protect public health and safety.
- b. Protect threatened or endangered species
- c. *Achieve management goals and objectives for wildlife populations, including game species*
- d. Prevent serious loss of domestic livestock

What the policies *should* say:

Predator control may be approved only after all feasible non-lethal methods have failed and only if *necessary* to:

- a. Protect threatened or endangered species
- b. Protect human health
- c. Lethal control for livestock protection in wilderness should be extremely rare and may be authorized only if (1) a livestock producer is utilizing all feasible non-lethal livestock protection techniques, and (2) severe losses have been documented, and (3) the producer is not financially compensated by any entity for the losses.
- d. Predator control will not be used to enhance visitor safety.
- e. Predator control will not be allowed in wilderness as a tool to achieve game management objectives

7. What the current policy says about who has authority to establish objectives for predator control in wilderness:

The Forest Service is responsible for determining the need for control, the methods to be used, and approving all proposed predator damage control programs in wilderness.

What the proposed policy says:

An objective of predator damage management in wilderness is to achieve management goals and objectives for wildlife populations as identified for wilderness in forest or wilderness plans, or through *other collaborative processes*

What the policy *should* say:

Same as current policy.

NOTE: Unidentified "collaborative groups" should not be setting "management goals and objectives for wildlife" that include using predator control as a means to achieve those goals!

## **Conclusion**

The proposed policy contains sweeping changes that dramatically increase the conditions under which predators may be killed in Wilderness. The changes that permit collaborative groups to set objectives for predator control in wilderness constitutes a radical change in Forest Service wilderness policy; this change is all the more dramatic when combined with the proposed flexibility to target entire predator populations instead of individuals and to use poisons, cyanide M-44's and motorized vehicles and aircraft inside wilderness for predator control activities.

Unlike poisons, aircraft, traps and motor vehicles, the native wildlife that inhabits wilderness have an intrinsic place in wilderness. Killing native predators to benefit livestock grazing or to boost populations of popular game species fundamentally violates the spirit and intent of the Wilderness Act and the very meaning of Wilderness!

The changes proposed in this new policy are so major and significant that the full analysis of an EIS is needed prior to adopting these changes as national policy.