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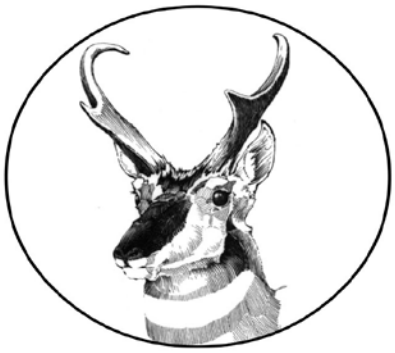

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14 January 2015

Mr. Todd Grimm, State Director,
USDA, APHIS, Wildlife Services
9134 W Blackeagle Dr.
Boise, ID 83709

RE: Federal Register Docket ID: APHIS-2014-0105-0003

Dear Mr. Grimm:

The American Society of Mammalogists (ASM) is a non-profit, professional, scientific, and educational Society consisting of nearly 3,000 members from all 50 United States and 60 other countries worldwide. The ASM was founded in 1919 and is the world's oldest and largest organization devoted to the study of mammals. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The Society has a long history of reviewing issues related to mammalian conservation, and where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats based upon our scientific expertise.

We are encouraged that USDA-APHIS is undertaking an environmental assessment of Wildlife Services' (WS) program of lethal control of carnivores in Idaho. The State of Idaho is home to a significant portion of the restored Northern Rocky Mountain (NRM) metapopulation of gray wolves, which the federal government has spent $40 million to restore (USFWS 2014). Idaho is also home to a portion of the federally

threatened lower-48 grizzly bear and Canada lynx populations, as well as populations of fisher and wolverine, which are listed, respectively, as 'critically imperiled' and 'imperiled' in Idaho (IDFG 2014). It is important that the many ecologic, economic, and intrinsic values of these native carnivores to all segments of the American public be fully considered. It is equally important to account for indirect effects—not just direct effects—on the above values that result when any native carnivore is removed from its natural environment. This includes an assessment of both the commodity and non-commodity values lost when non-target species are unintentionally killed by the non-specific lethal methods that Wildlife Services employs (Bergstrom et al. 2014).

Multiple incidents have been reported in which native and often protected species have been unintentionally killed as part of non-specific WS lethal control efforts. For example, in Idaho during 2013 alone, a federally protected Golden Eagle was among 7 native wildlife species killed in WS foothold traps set for carnivores and an American pronghorn was among 7 native wildlife species killed by WS in neck snares (WS 2014). Also, given that there are regulated harvests for many of these carnivore species, it is important to consider WS's contribution toward the cumulative effects of human sources of mortality on these taxa. For example, WS killed 65 gray wolves in Idaho in 2013 (WS 2014), which is in addition to the 302 wolves taken by hunters and trappers during the 2013-14 season (IDFG 2014). Assuming a base population of 700 wolves (USFWS 2014), WS's take raised the total human-caused mortality rate from 43% to 52%, which clearly surpasses the level that current science indicates is sustainable by the gray wolf population (Creel and Rotella 2010, Wielgus and Peebles 2014).

A full economic accounting of the consequences of lethal predator control must include an earnest attempt to account for the types of incidental mortality outlined above (see Loomis 2012); while it is relatively easy to quantify short-term consequences to livestock, many of the positive values of native carnivores (e.g., ecosystem services, wildlife-based tourism) have not been quantified by the USDA in its previous analyses of its lethal control programs. Recently published research suggests that the traditional method for dealing with depredation by large carnivores – lethal control – is actually counterproductive; reduction of the NRM wolf population through harvest and lethal control actually *increased* predation on livestock (Wielgus and Peebles 2014). The use of lethal predator control to enhance native ungulate populations, as has been implemented by WS in Idaho, is also now being called into question (Hervieux et al. 2014).

In sum, it seems likely that halting the routine use of lethal control of predators will not increase depredation on livestock, while implementing greater non-lethal, preventive control will likely decrease such predation. Further, curtailment of lethal control by the federal government could by example contribute to a new societal "normal" that includes greater tolerance for native carnivores, with a reduction in poaching as a potential associated outcome (Treves and Bruskotter 2014). Therefore, as we have done previously (ASM 2012), we strongly urge that WS shift

its emphasis toward public assistance and education aimed at use of non-lethal, preventive methods of predator control. We note that with regard to the 'Proposed Reasonable Alternatives', the 'No Action' plan does nothing to alter the current management strategy. We suggest that at a minimum, Idaho WS should implement more robust data collection procedures for both target and nontarget species in order to quantify rigorously the impacts of the various proposed management strategies (Bergstrom et al. 2014). Without such information, adaptive management strategies cannot exist, making it impossible for stakeholders to evaluate objectively the purported impacts of Idaho WS PDM policies.

In closing, we do not wish to see WS abandon its involvement in human-carnivore conflict management in Idaho. Rather, we would like to see this federal agency fulfill the objectives stated on its website by providing federal leadership in the practice of non-lethal control of predators on livestock.

Sincerely,

Eileen Lacey, Ph.D.
President, American Society of Mammalogists

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