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Sent: Friday, December 07, 2007 2:42 PM
To: Dear Colleague
Subject: Dear Colleague; Ag; Predator Control

OPPOSE LEGISLATION THAT BANS EFFICIENT, SAFE AND REGULATED
PREDATOR CONTROL TOOLS OF USDA-APHIS WILDLIFE SERVICES

Oppose the Compound 1080 and M-44 Elimination Act

December 6, 2007

Dear Colleague:

I strongly urge you to oppose legislation that seeks to outlaw two wildlife damage control tools, the livestock protection collar and M-44 Sodium Cyanide Capsules. As a livestock producer from the rural area, I know these two predator control tools are absolutely essential in combating aggressive predation.

Compound 1080 and M-44 Sodium Cyanide Capsules are effective and efficient tools used by the Wildlife Services (WS) program of the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) to protect livestock, poultry, and threatened and endangered species from predation by foxes, coyotes, and feral dogs. Critics imply that this type of work is done for big livestock ranchers, however, the majority of assistance provided by Wildlife Services personnel for livestock protection involves properties classified as small farms.

Both pesticides are environmentally sound tools registered by the Environmental Protection Agency (EPA) and used only by trained and certified applicators. The use is highly target specific, in limited applications, and in compliance with the regulations of the EPA and local jurisdictions. The quantities used are comparatively small. Utilization is controlled to limit unauthorized access and detrimental impact on the environment and nontarget species. APHIS has not received concerns from the EPA regarding the impacts of these compounds or the use of them relative to EPA guidelines.

Compound 1080 is used in a device known as the Livestock Protection Collar (LPCs). The LPC is placed on a sheep or goat, and it only affects a predator that is biting the throat of the livestock. This represents the most targeted method of livestock protection ever developed. Its registered use in livestock protection is under strict controls and only certified applicators are allowed to use it in accordance with EPA restrictions. Regarding safety concerns, Compound 1080 binds to soil organic matter limiting movement from sites of contamination, and is normally degraded by soil microorganisms and aquatic organisms. Scavenging animals would not be affected unless they consumed the hair or wool of the dead target or livestock, which are rare occurrences. LPCs can be used in more areas where other controls, such as trapping, cannot be.

Sodium cyanide is used in a device know as the M-44 ejector. The M-44 is baited to attract wild canids that prey on livestock and endangered species. WS and other certified applicators obtain the M-44 cyanide capsules from its secured Idaho supply depot, where the compound is made into capsules for use in the ejector device. Sodium cyanide (M-44) is degraded to non-detectable levels in about 24 hours and has low mobility. It is rapidly hydrolyzed in water and degraded by aquatic organisms. With the potential impact of non-targeted species, WS has taken great lengths to restrict its use of M-44 capsules so that species such as the California Condor and wolf are affected. Warning signs in English and Spanish are required even in the remote locations where use is most common.

Office of the Inspector General audits and reviews subsequent to homeland security legislation, have aided WS in focusing on improved inventories and security procedures, most recently in a January 2006 audit. Given the limited quantities used and continually improved safeguards, WS' use of the compounds does not represent a significant bioterrorist threat. In addition, WS has implemented a program that provides for the effective oversight, storage, and security of all hazardous materials and management of WS storage facilities used to store these materials.

WS' National Wildlife Research Center (NWRC) devotes approximately 75 percent of its budget to research on non-lethal methods. A 2004 survey by the National Agricultural Statistics Service documented that farmers and ranchers spent \$191 million on non-lethal methods to prevent predation in the cattle industry. Coyote deaths using M-44s and LPCs represent less than 16 percent and less than 0.04 percent of the annual coyote removal by WS. WS employs an Integrated Pest Management approach in which multiple strategies are used. Lethal methods are used only when determined to be the most effective and humane method.

Although livestock and other protections provided could continue, WS would serve fewer clients and serve less effectively without these chemical tools. Without these compounds, WS' work would continue but with potentially adverse impacts. In the absence of effective damage management, livestock losses to predation by coyotes could be two to three times more than current levels, estimated to be \$16.3 million in losses to the sheep industry and \$51 million in losses in the cattle industry. Without an effective predator management program, combining lethal and non-lethal methods, losses to predators would be significantly higher.

Again, I encourage you to stand up for the thousands of livestock producers in our country who provide the world's most abundant food supply and oppose this legislation. If you need additional information or if you have any questions, please do not hesitate to contact me or Tate Rosenbusch in my office at 225-4761 (Tate.Rosenbusch@mail.house.gov).

Sincerely,

John T. Salazar

Member of Congress

Tate Rosenbusch

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