



Western Watersheds Project

PO Box 1770

Hailey, ID 83333

tel: (208) 788-2290

fax: (208) 475-4702

email: wwp@westernwatersheds.org

web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds and Wildlife

March 28, 2017

Jason Suckow
Director, Western Region
USDA-APHIS-Wildlife Services
2150 Centre Avenue, Bldg. B
Mail Stop 3W9
Fort Collins, Colorado 80526-8117

Dear Mr. Suckow:

Pursuant to 5 U.S.C. § 555(e), Western Watersheds Project, Predator Defense, WildEarth Guardians, the Center for Biological Diversity, Friends of the Clearwater, Alliance for the Wild Rockies, Western Wildlife Conservancy, Nevada Wildlife Alliance, Gallatin Wildlife Association, Environmental Protection Information Center, the Wolf Conservation Center, Wilderness Watch, Klamath Forest Alliance, Northeast Oregon Ecosystems, Yellowstone to Uintas Connection, Footloose Montana, Animal Legal Defense Fund, Project Coyote, Voices of Wildlife, and the Mountain Lion Foundation petition the Animal and Plant Health Inspection Service (“APHIS”) and Wildlife Services (“WS”) to:

1. Cease all use of M-44 explosive cyanide devices on all land ownerships in the State of Idaho, and
2. Immediately remove any and all M-44s currently deployed on all land ownerships in Idaho.

As the recent tragedy involving the killing of a pet dog and the injury of a minor child near Pocatello, Idaho on March 16th, 2017 has shown, these devices are indiscriminate in their lethal effects, and cannot be rendered safe for non-target wildlife, domestic pets, and local residents.

This incident shows that Idaho Wildlife Services’ 2016 commitment to cease using M-44s on public lands in Idaho is inadequate to protect public safety and wildlife. The deployment of the device within ¼ mile of three homes also violates the 2016 BLM Idaho Falls District workplan with Wildlife Services that directs employees to place these devices more than a quarter mile away from residences. Either the commitment is not being followed by Wildlife Services personnel, or older M-44s are still planted on public

lands and have not been removed. In any case, the situation must be rectified with further action.

This was not an isolated incident, but instead the latest in a long string of unintentional pet killings and human poisonings resulting from the deployment of M-44s on lands of varying ownerships. Appendix A of this letter contains a litany of specific incidents of injuries and pet killings resulting from the deployment of M-44s by Wildlife Services. Appendix B summarizes the number of dogs killed each fiscal year based on reporting by Wildlife Services. Based on public statements from former Wildlife Services employees, fatal incidents with domestic dogs and other non-target species commonly go unreported, so these figures should be treated as conservative estimates. It is clear from this litany of poisonings that the standard operation procedures used by Wildlife Services in the deployment of these potentially deadly chemical landmines are not sufficient to prevent accidental deaths and injuries, and with the receipt of this letter Wildlife Services cannot claim that it is unaware that its actions are placing the public at risk of injury and loss of pets as a direct result of the use of M-44s.

M-44s are indiscriminate killers, killing non-target wildlife such as hawks and eagles, wolverines, lynx, and other species (Marks and Wilson 2005). Earlier in 2017, an M-44 killed a wolf in northeastern Oregon despite an agreement with state agencies that these types of lethal devices not be set in areas where wolves are known to roam. Since 2000, Wildlife Services has killed more than 50,000 members of more than 150 non-target species, including federally- and/or state-protected animals such as Mexican gray wolves, grizzly bears, kangaroo rats, eagles, falcons, California condors, red-tailed hawks, great horned owls, armadillos, pronghorns, porcupines, long-tailed weasels, javelinas, marmots, snapping turtles, turkey vultures, great blue herons, ruddy ducks, sandhill cranes, and ringtail cats.¹

Furthermore, Wildlife Services' predator killing program is potentially counterproductive. Nonselective predator killing methods (like M-44s) have not been shown to reduce losses of domestic sheep to predators (Conner et al. 1998, Mitchell et al. 2004, Berger 2006). In some cases, predator killing programs actually result in *increased* livestock losses (Peebles et al. 2013, Wielgus and Peebles 2014). Nor has any agency provided an economically rigorous cost-benefit analysis that indicates that the cost of taxpayer expenditures for predator-killing programs are less than the value of livestock lost to predators occupying their native habitats.

Predator control also upsets that natural balance of ecosystems, and has the counterproductive effect of releasing smaller predators to increase in population, which causes systemic ecological imbalances that depress populations of birds and other prey species (*see, e.g.*, Rogers and Caro 1998, Crooks and Soulé 1999, Ritchie and Johnson 2009). Eliminating or suppressing populations of apex predators can result in the proliferations of smaller, predators, sometimes called 'mesopredators,' to the detriment of birds and small mammals. In Wyoming, coyote control efforts in the name of sage grouse conservation increased the numbers of foxes and other small predators that pose a

¹ Tom Knudson, *Suggestions in Changing Wildlife Services Range from New Practices to Outright Bans*, SACRAMENTO BEE (May 6, 2012).

significantly greater risk for sage grouse (Mezquida et al. 2006). This is particularly important given the West-wide imperative for conservation of sage-grouse populations. Even if M-44s killed only target species, we find the use of lethal methods against native wildlife to be morally reprehensible and scientifically unsupportable.

Given the serious negative impacts of these types of predator killing programs on native wildlife, the questionable economic benefits (and in many cases, economic harms) of such programs for the livestock industry, and the clear and present danger that M-44 devices pose to families, their pets, and native wildlife, the use of M-44s on open lands of any ownership is unjustifiable and counter to the public interest. We call upon APHIS and Wildlife Services to clear all lands in Idaho of these dangerous devices at the soonest possible time, and prohibit the future placement of such chemical devices on lands of any ownership.

Very sincerely yours,



Erik Molvar

Western Watersheds Project

Signing on behalf of

Brooks Fahy
Executive Director
Predator Defense
PO Box 5446
Eugene, OR 97405
Office: 541-937-426

Tom Wheeler
Executive Director
Environmental Protection Information
Center (EPIC)
145 G Street Suite A
Arcata, CA 95521
Office: (707) 822-7711

Mike Garrity
Executive Director
Alliance for the Wild Rockies
P.O. Box 505
Helena, MT 59624

Gary Macfarlane
Ecosystem Defense Director
Friends of the Clearwater
PO Box 9241
Moscow, ID 83843
(208) 882-9755

Donald A. Molde, M.D.
Co-founder
Nevada Wildlife Alliance
P.O Box 4049
Incline Village, Nevada 89450

Kirk Robinson
Executive Director
Western Wildlife Conservancy
1021 Downington Av.
Salt Lake City, UT 84105

Glenn Hockett
Volunteer President
Gallatin Wildlife Association
P.O. Box 5317
Bozeman, MT 59717
(406) 586-1729

Maggie Howell
Executive Director
Wolf Conservation Center
PO Box 421
South Salem, NY 10590

Andrea Santarsiere
Senior Attorney
Center for Biological Diversity
P.O. Box 469
Victor, ID 83455
Tel: (303) 854-7748

Kimberly Baker
Executive Director
Klamath Forest Alliance
PO Box 21
Orleans, CA 95556

Wally Sykes
Co-Founder
Northeast Oregon Ecosystems
Box 733
Joseph, OR 97846

Connie Poten
Secretary
Footloose Montana
P.O. Box 8884
Missoula, MT 59807

George Nickas
Executive Director
Wilderness Watch
PO Box 9175
Missoula, MT 59807
p- 406-542-2048

Bethany Cotton
Wildlife Program Director
WildEarth Guardians
P.O. Box 7516
Missoula, MT 59807

John Carter
Yellowstone to Uintas Connection
PO Box 363
Paris, ID 8326

Camilla Fox
Project Coyote
P.O. Box 5007
Larkspur, CA 94977

Brian Perkes
President
Voices of Wildlife
1042 E Fort Union Blvd # 341
Midvale, UT 84047

Lynn Cullens
Executive Director
Mountain Lion Foundation
P.O. Box 1896
Sacramento, California 95812
916.606.1610

Sarah Hanneken
Litigation Fellow
Animal Legal Defense Fund
525 East Cotati Avenue
Cotati, California 94931

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Wielgus, R.B., and K.A. Peebles. 2014. Effects of wolf mortality on livestock depredations. *PLOSone* <http://dx.doi.org/10.1371/journal.pone.0113505>

Appendix A

Specific Incidents of Pet Killings and Human Poisonings Caused by M-44s

The list below documents incidents of people and domestic animals injured or killed by M-44 cyanide devices used by USDA Wildlife Services. This list was compiled from agency documents, news reports, and various other sources by the Humane Society of the United States and Predator Defense. It is only a partial account, since many deaths go unreported.

March 2017: A dog and a 14-year-old boy triggered an M-44 in Idaho. The boy, along with several emergency personnel, were exposed to cyanide. His dog died in front of him. No warning signs were posted.ⁱ

March 2017: two dogs were killed in Wyoming by an M-44 during a walk with their family.ⁱⁱ

February 2011: An M-44 was placed 918 from a residence without the family's knowledge, killing their dog and violating three EPA use restrictions^{iii,iv}

February 2010: A dog was killed in Nebraska by an M-44 set by Wildlife Services on the dog owner's rangeland/pasture.^v

April 2010: A dog wearing collar and tags was killed in W. Virginia by an M-44 set on neighboring land. The Wildlife Services agent buried her without notifying the family.^{vi}

January 2008: A dog was killed by an M-44 in N. Dakota.^{vii}

January 2008: A man in Texas was injured by an M-44 placed without his knowledge on grazing land.

February 2008: A beagle was killed by an M-44 in Virginia^{viii}

February 2008: a dog was killed by an M-44 in New Mexico.^{ix}

April 2008: A dog in N. Dakota was killed by an M-44 set on rangeland/pasture.^x

June 2008: A pit bull was killed in Virginia by an M-44 in a livestock pasture/hayfield.^{xi}

January 2007: A dog was killed by an M-44 in North Dakota.^{xii}

March 2007: A Border collie was killed by an M-44 in Virginia.^{xiii}

April 2007: A Border collie puppy was killed by an M-44 in Virginia.^{xiv,xv}

May 2007: A worker in Texas accidentally triggered an M-44. The cyanide was ejected into the man's eyes and he subsequently experienced burning and irritated eyes as well as disorientation.^{xvi,xvii}

June 2007: A Great Pyrenees was killed by an M-44 in New Mexico.^{xviii}

January 2006: A Golden retriever was killed by an M-44 in Virginia.^{xix,xx}

February 2006: A Labrador retriever was killed in Utah when she triggered an M-44 set a foot from a road.^{xxi}

April 2006: A young German shepherd was killed when he triggered an M-44 on public land in Utah.^{xxii,xxiii}

March 2005: An Australian Shepherd was killed in New Mexico by an M-44 set by Wildlife Services on rangeland.^{xxiv}

March 2005: A dog was killed in New Mexico by an M-44 set by Wildlife Services on ranch land.^{xxv}

April 2005: A Border collie in New Mexico was killed by an M-44 set on the owner's ranch property.^{xxvi,xxvii}

December 2005: A certified therapy dog who worked with at-risk youth was killed in front of a girl's group by an M-44 set 10 feet from a public road.^{xxviii,xxix}

January 2004: A dog was killed by an M-44 set by Wildlife Services in New Mexico on the ranch of the dog owner's relative.^{xxx}

February 2004: An Irish setter was likely killed by an M-44 in Virginia.^{xxxi}

March 2004: A dog in Idaho was found dead within 200 yards of an M-44 set by Wildlife Services in a nearby sheep pasture.^{xxxii,xxxiii}

March 2004: A German shepherd was killed by an M-44 in New Mexico.^{xxxiv}

May 2003: Dennis Slaugh was poisoned and permanently disabled when he triggered an M-44 on public land in Utah. He was forced to retire from his job.^{xxxv}

January 2002: A rancher in Nebraska was injured by the accidental discharge of an M-44 that had been set by Wildlife Services on his property.^{xxxvi}

February 2002: A dog was killed by an M-44 set by Wildlife Services.^{xxxvii}

February 2002: A Labrador retriever was killed in Virginia by an M-44 set by Wildlife Services on a neighbor's cattle pasture.^{xxxviii}

February 2002: a dog was killed in New Mexico by an M-44 set by Wildlife Services on rangeland/pasture^{xxxix}

February 2002: A dog triggered an M-44 in Oregon placed on a neighboring ranch by Wildlife Services^{xl}

February 2002: A dog was killed by an M-44 set by Wildlife Services^{xli}

February 2002: A dog was killed by an M-44 set by Wildlife Services on the farm of the dog owner's relative^{xlii}

February 2002: A dog in Oregon took 8 hours to die after exposure to an M-44 set on property next door to her home and without her knowledge. During a subsequent investigation WS requested that Oregon authorities "consider the info provided during the investigation be confidential *and not disclosed as public record* [emphasis added]." WS also refused to release a copy of the incident report to the dog's owner.^{xliii,xliv,xlv}

April 2002: A dog was killed by an M-44 set by Wildlife Services on a neighboring farm in Virginia.^{xlvi}

June 2002: A black Angus cow was killed in W. Virginia by an M-44 set by Wildlife Services in a pasture.^{xlvii}

November 2002: A woman was injured after trying to remove an M-44 set by Wildlife Services on her neighbor's property.^{xlviii}

May 2001: A dog in Colorado was killed by an M-44 set by Wildlife Services on a neighboring ranch "outside the provisions authorized by state law".^{xlix}

April 2001: A dog in Nebraska was killed by an M-44 set by Wildlife Services on rangeland/pasture.^l

January 2000: A dog in Oregon was killed after triggering an M-44 set 100 yards from the owner's home. The device was one of eight that had been planted in a tree farm frequented by local children.^{li,lii,liiii}

February 2000: A dog in New Mexico activated an M-44 set on rangeland/pasture by Wildlife Services.^{liv}

March 2000: A dog in Colorado was killed by an M-44 set on private property without the knowledge of the owners. The family, including a three-year-old girl, watched as the dog

suffered and died. A state investigation found that Wildlife Services had not only trespassed, but broken a suite of federal rules regulating M-44s.^{lv}

May 2000: A Border collie in West Virginia was killed by an M-44 set by Wildlife Services in a sheep pasture.^{lvi}

September 2000: A county surveyor in Utah discharged an M-44 after mistaking it for a survey marker.^{lvii}

March 1999: A man and his three-year old daughter were walking with their dog on their property in Colorado when it triggered an M-44 and later died. A WS staffer had placed two traps on their land, trespassing and breaking a suite of federal rules.^{lviii}

April 1999: A dog was killed in Virginia when he triggered an M-44 set by Wildlife Services on a neighboring farm. The owner also found another dog's body at the device. A third dog also came into contact with an M-44 and returned home with red and swollen eyes as well as a swollen mouth and a peculiar odor. The owner himself likely experienced secondary poisoning.^{lix,lx}

August 1999: An individual helping a Wildlife Services employee look for and remove M-44s accidentally fired one of the devices.^{lxi}

September 1999: A hunting dog was killed in Virginia by an M-44 set by Wildlife Services. M-44s were not permitted for use in that state from September 1 to January 7, but the Wildlife Services employee had failed to remove them.^{lxii}

September 1999: A dog was killed in Oregon by an M-44 set by Wildlife Services.^{lxiii}

October 1999: A Wildlife Services employee in Texas accidentally discharged an M-44 as he was setting it. He had to be airlifted to a facility for treatment.^{lxiv}

October 1999: A dog was killed in Utah by an M-44 set by Wildlife Services.^{lxv}

December 1999: Two dogs were killed by M - 4 4 s during a hunting trip in New Mexico on state lands.^{lxvi}

December 1999: A citizen in Nebraska accidentally discharged an M-44 as he attempted to move it with a pair of pliers while he was repairing fence wire.^{lxvii}

February 1998: A dog in Utah was killed by an M-44 set by Wildlife Services on BLM land that adjoined the owner's private yard. No one was notified about Wildlife Services' activities.^{lxviii,lxix,lxx}

November 1998: A man in Texas, working on private land, was injured when he grabbed what he thought was a rusted metal rod to pull it from the ground and an M-44 exploded in his hand.^{lxxi}

December 1998: A dog was killed in Oregon by an M-44 set by Wildlife Services.^{lxxii}

April 1995: A hunter in Idaho accidentally discharged an M-44 that had been set by Wildlife Services.^{lxxiii}

Fall 1994: A dog in Oregon was walking with its family when it triggered an M-44 set on the property without their knowledge. The owners, not knowing why their dog was in respiratory distress, attempted mouth-to-mouth resuscitation, resulting in secondary cyanide poisoning. The dog suffered for 15 minutes before dying.^{lxxiv}

August 1993: Two bow hunters in Utah pulled M-44s set by Wildlife Services.^{lxxv}

April 1990: A dog in New Mexico accompanying a ranch hand triggered an M-44. After attempting mouth-to-mouth resuscitation on the dog, who died within a few minutes, the man quickly experienced loss of breath, a swollen tongue, a fast heart rate, numb lips, and curling fingers on one hand. He was transported to a hospital where he was treated and placed in intensive care.^{lxxvi}

Appendix B

Wildlife Services Summary Statistics of Domestic Dog Killings by M-44s

FY 2016: 22 dogs^{lxxvii} and 7 "domestic animals (pets or livestock)" unintentionally killed by M-44s^{lxxviii}.

FY 2015: 17 dogs and 6 "domestic animals (pets or livestock)" unintentionally killed by M-44s^{lxxix}.

FY 2014: 17 dogs and 7 "domestic animals (pets or livestock)" unintentionally killed by M-44s^{lxxx}.

FY 2013: 44 dogs and 2 "domestic animals (pets or livestock)" unintentionally killed by M-44s^{lxxxii}.

FY 2012: 27 dogs unintentionally killed by M-44s^{lxxxiii}.

FY2011: Wildlife Services reports 32 dogs unintentionally killed by M-44s^{lxxxiv}.

FY 2010: 40 dogs unintentionally killed by M-44s^{lxxxv}.

FY 2009 32 dogs unintentionally killed by M-44s^{lxxxvi}.

FY 2008 32 dogs unintentionally killed by M-44s^{lxxxvii}.

FY 2007 50 dogs unintentionally killed by M-44s^{lxxxviii}.

FY 2006 63 dogs unintentionally killed by M-44s^{lxxxix}.

FY 2005 92 dogs killed by M-44s (not broken out by intentional/unintentional)^{lxxxix}.

FY 2004 117 dogs were killed by M-44s (not broken out by intentional/unintentional)^{xc}.

FY 2003 108 dogs killed by M-44s (not broken out by intentional/unintentional)^{xcii}.

FY2002 120 dogs killed by M-44s (not broken out by intentional/unintentional)^{xciii}.

2001 169 dogs killed by M-44s (not broken out by intentional/unintentional)^{xciv}.

2000 178 dogs killed by M-44s (not broken out by intentional/unintentional)^{xcv}.

1999 228 dogs killed by M-44s (not broken out by intentional/unintentional)^{xcvi}.

1998 267 dogs killed by M-44s (not broken out by intentional/unintentional)^{xcvii}.

1997 237 dogs killed by M-44s (not broken out by intentional/unintentional)^{xcvii}

END NOTES

ⁱ Idaho State Journal David Ashbury March 16 2017 Pocatello boy watches family dog die after cyanide bomb explodes. http://idahostatejournal.com/news/local/pocatello-boy-watches-family-dog-die-after-cyanide-bomb-explodes/article_d0003a2f-6b7f-5d31-b427-68db03d3b93a.html

ⁱⁱ http://www.predatordefense.org/features/m44_WY_Amy_dogs.htm

ⁱⁱⁱ Predator Defense, http://www.predatordefense.org/m44s_bella.htm

^{iv} Tom Knudson, "Efforts to investigate Wildlife Services' methods continue," The Sacramento Bee, June 25, 2012.

^v USDA-APHIS-WS, Adverse Effects Incident Information Report.

^{vi} Letter from James R. Gardner to Commissioner Gus Douglas, West Virginia State Department of Agriculture, 21 April 2010.

^{vii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{viii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{ix} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^x USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xiii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xiv} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xv} USDA-APHIS-WS, Report of Injury or Death of Nontarget Animal.

^{xvi} USDA-APHIS-WS, Report of Injury or Death of Nontarget Animal.

^{xvii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report.

^{xviii} Brazoria County Sheriff Incident/Offense Report, 22 May 2007.

^{xix} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xx} USDA-APHIS-WS, Adverse Effects Incident Information Report.

^{xxi} USDA-APHIS-WS, Report of Injury or Death of Nontarget Animal.

^{xxii} Mike Stark, "Dog died at cyanide trap set in an off-limits area," Associated Press, 01 June, 2008.

^{xxiii} Memo from Michael J. Bodenchuk, Utah State Director, Wildlife Services to Ms. Barbara Knotz, 21 June 2006.

^{xxiv} "Utah couple challenges USDA use of cyanide bombs," Associated Press, 20 August 2006.

^{xxv} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxvi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxvii} USDA-APHIS-WS, Adverse Effects Incident Information Report.

^{xxviii} USDA Work Task form, 15 April 2005.

^{xxix} USDA-APHIS-WS, Adverse Effects Incident Information Report.

^{xxx} Born Free USA, http://www.bornfreeusa.org/database/trapping_incident.php?id=110

^{xxxi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxxii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxxiii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxxiv} USDA-APHIS-WS, Report of Injury or Death of Nontarget Animal.

^{xxxv} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxxvi} Christopher Ketcham, "America's secret war on wildlife," Men's Journal, January 2008, p. 49.

^{xxxvii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report.

^{xxxviii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xxxix} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

^{xl} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.

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- ^{xi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{xli} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{xliii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{xliiii} Letter from Danielle Clair to Congressman Peter DeFazio, 18 February 2002.
- ^{xliv} Letter from Mark Jensen, Oregon Assistant State Director, Wildlife Services, to Dale Mitchell, Assistant Administrator, Oregon Department of Agriculture, 15 April 2002.
- ^{xlv} Letter from Congressman Peter DeFazio to Bill Clay, Deputy Administrator of Wildlife Services, 24 May 2002.
- ^{xlvi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{xlvii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{xlviii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report.
- ^{xlix} Memo from Craig Coolahan, Colorado State Director, USDA-APHIS-WS to Martin Mendoza, Director, OSS, 16 May 2001.
- ^l USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{li} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lii} Keri Watson and Greg Hanscom, "Poison traps kill unintended victims," High Country News, March 13, 2000.
- ^{liii} Predator Defense, http://www.predatordefense.org/docs/m44_article_Buddy_Tippetts.pdf
- ^{liv} USDA-APHIS-WS, Adverse Effects Incident Information Report.
- ^{lv} Keri Watson and Greg Hanscom, "Poison traps kill unintended victims," High Country News, March 13, 2000.
- ^{lvi} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lvii} Memo from Michael J. Bodenchuk to Michael V. Worthen and Thomas R. Hoffman, 28 September 2000.
- ^{lviii} High Country News 3/1300 Poison traps kill unintended victims <https://www.hcn.org/issues/174/5628>
- ^{lix} Written account from Gary Tucker, 20 May 1999.
- ^{lx} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lxi} Accident Report signed by Alan May, District Supervisor, 16 August 1999.
- ^{lxii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lxiii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lxiv} USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report.
- ^{lxv} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lxvi} Keri Watson and Greg Hanscom, "Poison traps kill unintended victims," High Country News, March 13, 2000.
- ^{lxvii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Human Incident Supplemental Report.
- ^{lxviii} Memo from Nick Sandberg, Bureau of Land Management to Mike Bodenchuck, USDA-APHIS-WS, 19 March 1998.
- ^{lxix} U.S. Department of the Interior, Bureau of Land Management Incident Record, Case No. UT-069-98-03.
- ^{lxx} U.S. Department of the Interior, Bureau of Land Management, San Juan Resource Area, Conversation Confirmation Report, 03 March 1998.
- ^{lxxi} Predator Defense, http://www.predatordefense.org/docs/m44_letter_Guero_DeFazio.pdf
- ^{lxxii} USDA-APHIS-WS, Adverse Effects Incident Information Report and Domestic Animal, Fauna, or Flora Incident Supplemental Report.
- ^{lxxiii} Memo from Dr. Peter L. Joseph, USDA-APHIS-Biotechnology, Biologies, and Environmental Protection to Mr. Robert A. Forrest, U.S. Environmental Protection Agency, 25 April 1995.
- ^{lxxiv} Predator Defense <http://www.predatordefense.org/testimonials.htm>
- ^{lxxv} Memo from James A. Winnat, Utah State Director, USDA-APHIS-WS to ADC employees, 09 September 1993.
- ^{lxxvi} Memo from Larry J. Killgo, State Director, ADC, Albuquerque, NM to District Supervisor, ADC, Roswell, NM, 01 May 1990.
- ^{lxxvii} Described as "Feral, Free-Ranging, and Hybrids" by Wildlife Services
- ^{lxxviii} https://www.aphis.usda.gov/wildlife_damage/pdr/PDR-G_Report.php?fy=2016&fld=&fld_val=
- ^{lxxix} https://www.aphis.usda.gov/wildlife_damage/pdr/PDR-G_Report.php?fy=2015&fld=&fld_val=
- ^{lxxx} https://www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/sa_reports/sa_pdrs/sa_2014/ct_pdr_g
- ^{lxxxi} https://www.aphis.usda.gov/wildlife_damage/prog_data/2013/G/Tables/Table_G_Long_Method_Featured.pdf
- ^{lxxxii} https://www.aphis.usda.gov/wildlife_damage/prog_data/2012_prog_data/PDR_G/Basic_Tables_PDR_G/Table_G_Long_Method_Featured.pdf
- ^{lxxxiii} USDA APHIS Wildlife Services Program Data Reports. 2011.
- ^{lxxxiv} https://www.aphis.usda.gov/wildlife_damage/prog_data/2011_prog_data/PDR_G/Basic_Tables_PDR_G/Table_G_Long_Method_Featured.pdf Accessed 3/26/17.
- ^{lxxxv} USDA APHIS Wildlife Services Program Data Reports. 2010
- ^{lxxxvi} https://www.aphis.usda.gov/wildlife_damage/prog_data/2010_prog_data/PDR_G/Basic_Tables_PDR_G/Table_G_Long_Method_Featured.pdf

^{lxxxv} https://www.aphis.usda.gov/wildlife_damage/prog_data/2009_prog_data/PDR_G_FY09/Basic_Tables_PDR_G/Table_G_FY2009_Long_Method_Featured.pdf
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^{lxxxvii} USDA-APHIS-WS

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^{lxxxviii} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/Table%20G,%20FY2006.pdf

^{lxxxix} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/TABLE%2010T,%20FY%202005.pdf

^{xc} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/TABLE%2010Killed,%20FY%202004.pdf

^{xcii} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/03table10t.pdf

^{xciii} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/02table10t_Sept%202007_TX_correct.pdf

^{xciv} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/01table10t.pdf

^{xcv} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/Table_10_1998-2000/Table10t_FY2000.pdf

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^{xcviii} https://www.aphis.usda.gov/wildlife_damage/annual%20tables/Table_2_1996-1997/Table2t_FY1997.pdf