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**Jeremy Drew, Chairman
Nevada Board of Wildlife Commissioners
6980 Sierra Center Parkway, #120
Reno, Nevada 89511**

Regarding: FY 2017 Draft Predator Management Plan

Dear Chairman Drew

The above-referenced document falls far short of perfection, or even as an acceptable first draft. It utterly fails to meet requirements put forth in Commission Policy #23, and looks problematic from the point of view of AB 78.

AB 78:

The following requirements taken from the Enrolled text of AB 78 (my apology for not having a clean copy of AB 78) raise serious questions:

Sec. 4. NRS 502.253 is hereby amended to read as follows:

502.253 1. In addition to any fee charged and collected pursuant to NRS 502.250, a fee of \$3 must be charged for processing each application for a game tag, the revenue from which must be accounted for separately, deposited with the State Treasurer for credit to the Wildlife Fund Account in the State General Fund and used by the Department for costs related to:

- (a) [Programs] Developing and implementing an annual program for the management and control of [injurious] predatory wildlife;
- (b) Wildlife management activities relating to the protection of nonpredatory game animals [,] and sensitive wildlife species ; and [related wildlife habitat;]
- (c) Conducting research [, as needed,] necessary to determine successful techniques for managing and controlling predatory [wildlife, including studies necessary to ensure effective programs for the management and control of injurious predatory wildlife; and
- (d) Programs for the education of the general public concerning the management and control of predatory] wildlife.

Of note here is provision 502.253 1. (c) which appears to require (not optional) research, Nevada based, to support proposed projects.

AB 78 further states:

3. Any program developed or wildlife management activity or research conducted pursuant to this section must be developed or conducted under the guidance of the Commission in accordance with the provisions of subsection 4 and the policies adopted by the Commission pursuant to [subsection 2 of] NRS 501.181.

4. The Department:

(a) In adopting any program for the management and control of predatory wildlife developed pursuant to this section, shall first consider the recommendations of the Commission and the State Predatory Animal and Rodent Committee created by NRS 567.020.

(b) Shall not adopt any program for the management and control of predatory wildlife developed pursuant to this section that provides for the expenditure of less than 80 percent of the amount of money collected pursuant to subsection 1 in the most recent fiscal year for which the Department has complete information for the purposes of lethal management and control of predatory wildlife.

Of note here, is provision 502.253 4. (b) which specifies expenditure of funds at the 80% level ONLY for projects for which the Department has “complete” (my emphasis) information for the purposes of lethal management and control. Also note that 502.253 3. requires projects to comply with Commission Policy #23.

Commission Policy #23:

Commission Policy #23 was adopted December 7, 2013 after nearly a year of effort put forth by then-Commissioner McBeath and his committee. Its provisions mirrored many of those contained in AB 345, passed by the 2013 legislature but vetoed as redundant by Governor Sandoval.

Here are its provisions that relate to lethal control projects. (Note the use of terms such as: clear goals, objectives and timelines, geographic locations, objective analysis, needs of wildlife populations, balanced and viable carnivore and/or corvid wildlife populations, conducted where game and sensitive wildlife populations are at risk for being disproportionately affected by predation)

A. POLICY FOR PROGRAMS FOR THE MANAGEMENT AND CONTROL OF PREDATORY WILDLIFE

1. Conduct Projects in the most efficient and cost-effective manner possible, with clear goals, objectives and timelines defined at the onset, and with an emphasis on identifying and refining prescriptive measures of Predation Management for

use in the future. Lethal and/or nonlethal predator control efforts will be undertaken in a targeted fashion to minimize specific wildlife-related losses to wildlife populations without endangering long-term health, vigor and/or ecological services provided by balanced and viable carnivore and/or corvid wildlife populations.

2. Geographical locations for Project areas will be determined based on an objective analysis and on the needs of wildlife populations in the area. Priority will be given to provide synergy in areas where other efforts are completed, under way, or planned that will also benefit wildlife populations to provide the best data possible.
3. Control activities will be conducted where game and sensitive wildlife populations are at risk of being disproportionately affected by predation.
4. If needed to assess Project viability, statewide and Project area estimates of carnivore and corvid populations or densities will be based on an objective analysis.
5. The Commission recognizes the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (Wildlife Services), as a

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cooperating agency in lethal predatory wildlife control. The Commission also recognizes qualified contractors and cooperators may be available for predator population management, habitat management, predator prey research, conservation education and carnivore population monitoring efforts.

6. In terms of lethal control, Wildlife Services personnel or other contractors shall salvage (when practicable) and give the hide and skull of any mountain lion, black bear and bobcat removed under authority of a contract with the Department within 96 hours of the removal.

Draft Plan Comments: Here are a few of my concerns...

1. **Nearly all proposed projects contain but a single sentence under “Justification”, yet propose expenditure of 10’s of thousands of dollars to kill Nevada wildlife.**
2. **There is no department data clarifying the “Why there, why now?” question for nearly all of the proposals.**
3. **Though some of these projects have gone on for years, there is no monitoring data, evidence of effectiveness/non-effectiveness, or qualitative assessment of results/lack of results to justify continuing projects or terminating them.**

4. **There is no cumulative fiscal/body count data for ongoing projects as was the case prior to two years ago.**
5. **Proposed Projects 37, 38 represent the most egregious departure from the requirements of AB 78 and Commission Policy #23, putting forth a total of \$180,000 to be spent statewide to kill mountain lions and coyotes without a shred of justification: no field studies, no density data, no trend data, no localities of concern.**
6. **The decisions in Projects 37, 38 about what animals need to be killed and for what reason would be made entirely away from public scrutiny. These proposals amount to the equivalent of a “slush fund” which may have purpose in business, but makes no sense in what happens to a public asset.**
7. **The bibliography is incomplete and probably biased towards killing non-human predators. For example, the Hurley study conducted by Idaho Fish and Game over a several year period with control groups and good data collection which shows the serious limitations of randomly killing coyotes and mountain lions to benefit deer populations is not included. Your own Project 14 & 15 analysis showing similar results was not included.**
8. **So far, after more than a dozen years and the expenditure of over \$5 million to kill coyotes and mountain lions and poison ravens in Nevada, there is not a single project that can be said to have benefitted game species. Project 6, Project 14&15, Project 17, Project 18 and others...all failures at a cost of millions of dollars and the destruction of thousands of coyotes and ravens and dozens of lions.**

ALL IS NOT LOST:

I understand that the department and the commission is in a predicament. The passage of AB 291 in 2001 and the recent addition of AB 78 is the law. You didn't create this mess. You have to do something in response to the law and the money.

But, it is my contention that you are not devoid of options. There is no need to foist such an anemic set of proposals on the public, or, in my view, to destroy public property without good reason or expectation of benefit. Piles of dead coyotes, ravens and lions do not represent a public benefit to me and those I deal with on these issues.

Your own policy and the provisions of AB 78 clearly state that research and the possession of “complete information” is required to carry out predator management. That suggests to me that the 80% expenditure requirement can reasonably be viewed to include necessary field work, research, data collection, trend analysis and the like to justify and support

lethal intervention in a specific geographic location for a targeted purpose and for a limited time. It would also cover post-intervention analysis to evaluate effectiveness of the project.

Furthermore, NRS 502.253, Section 5 stipulates that monies received do not revert to the State General Fund at the end of any fiscal year. Thus, there is no financial risk in considering a new approach to this issue.

At the Department of Agriculture PARC committee meeting on January 21, 2016, Dr. Lent and Mr. Capurro, authors of AB 78, both expressed concern at the lack of compliance of the Draft Predator Plan with the requirements of Policy# 23. They suggested that the money spent on these projects should produce a beneficial result for wildlife and not just create a body count. In that, I agree with them.

I believe you are justified to ask the department of focus on gathering necessary data to support such proposals instead of settling for much, much less. A few noisy sportsmen who might complain about it should not be allowed to derail actions that would show an act of public responsibility on the part of the commission and the department.

Sincerely

Don Molde