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3290 Penfield Circle
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January 24, 2016

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.

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

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 theses 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.**

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

February 18, 2016

Dear Commissioners & Members of the PARC Committee:

As a representative of the Nevada Wildlife Alliance, I wish to state for the record our continued objection and horror the on-going Predator Management program and to its increased level of activity due to AB 78. To begin with, the very premise of "predator management" is in direct conflict with NDOW's stated mission which is "to preserve, protect, manage, and restore wildlife and it habitat for the aesthetic, scientific, education, recreational and economic benefit of the Nevada and the United States." Rather, what these outmoded and barbaric programs have accomplished since 2000 is to kill over 2 million of American's native mammals and 15 million native bird in the name of protecting ranchers and their stock.

Reading again from a 2014 peer-review article in Conservation Letters as well as this month Harper's Magazine here is a summary of the devastation caused by Wildlife Service predation program .Since 2000, Wildlife Services operatives have killed at least 2 million native mammals and 15 million native birds. Many of these animals are iconic in the American West and beloved by the public. Several are listed as endangered or threatened under the Endangered Species Act. In 2014, Wildlife Services killed 322 wolves, 61,702 coyotes, 2,930 foxes, 580 black bears, 796 bobcats, five golden eagles, and three bald eagles. The agency also killed tens of thousands of beavers, squirrels, and prairie dogs.

Meanwhile scientific study after study has emphasized the essential, critical importance of these animals to ecosystem health. Let me again read from this same article: " The continuing heavy reliance of the federal government of lethal control of native mammals is a vestige of the outmoded mentality of western expansionism, in which the goal was to "tame" the wilderness, replace the ecosystem's primary-consumer tropic level entirely with domesticated herbivores and a few favored game species and all higher trophic levels with humans. Its survival into the 21st century defies the consensus among ecologists that significant reductions in local populations of native primary consumers and apex predators has had far-reaching consequences on primary production, nutrient flows, disease incidence and biodiversity at all level and at all spatial scales."

Bringing this back to Nevada, I appreciate that AB78 presents a challenge for NDOW but as the department charged with preserving and protecting our wildlife you have failed your own mission and deceived the public since the inception of these programs. The predator plans for 2016 and 2017 are further particularly disgraceful in the complete absence of rational or reason in terms of supporting research. In project after project, assumptions are made that are simply not supported by research could done by NDOW. For example, project 22-01 "lethal removal of mountain lions will allow newly reintroduced bighorn sheep populations to reach sustainable level." Project 22-074, "lethal removal of mountain lions will allow reintroduced Rocky Mountain bighorn sheep populations to reach sustainable levels." Rather it is my understanding that Rocky Mountain bighorn sheep are at record levels in Nevada and sustaining serious disease issues. If allowed to do

their job as apex predators, the mountain lion, might actually address these issue by killing the week and sick sheep. That is the correct, ecological order of nature.

AB 78 is the product of bad politics and outmoded thinking that killing our mountain lions, coyotes, badgers and ravens will somehow increase ungulates. NDOW's role needs to be to stand up against this law and find a way to stop its implementation by appealing to the State legislator and Governor. NDOW needs to demonstrate leadership that it actually understands ecology and cares about Nevada's wildlife.

Every Commissioner and member of this committee ought to fully acquaint themselves with the beneficial role of predators and refuse to implement these futile, absurd predator killing programs that are doing such damage to our wildlife and the health of our wildlands.

Sincerely Yours,

Constance Howard

Nevada Wildlife Alliance

MOUNTAIN LION FOUNDATION

Saving America's Lion

enter into record

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February 18, 2016

Nevada Department of Agriculture
Predatory Animal and Rodent Control Committee

Dear Members of the Committee:

The Nevada Department of Wildlife's Predator Management Program has been expanded in the 2016 and 2017 Plans to include additional programs to kill mountain lions. Implementation of these programs will result in substantial additional mountain lions mortality in the State.

While NRS 502.253 requires that the Department use funds to manage and control predatory wildlife and conduct research to determine successful techniques for managing and controlling predatory wildlife, it also gives the department wide latitude in developing the projects to do so.

It is clear that the funds may be used to develop the plans for proposed on-the-ground activities. The planning process for any lethal removals – including trophy and sport hunting, depredation removals, and pre-emptive removals for protection of prey species or other reasons – should include a thorough review of the mountain lion literature and current science, data collection and analysis, trend analysis and other scientific activities that are required in order to justify and support any non-lethal methods and/or lethal removals.

The plans as currently proposed do not adhere to Commission Policy #23, adopted for the Predator Management Program by the Nevada Board of Wildlife Commissioners, with regard to project viability, specificity, targeting, effectiveness, clear goals, objectives and timelines.

Most importantly, the 2016 and 2017 plans with respect to mountain lions fail to establish current local predator populations and measures of population health, vigor and ecological services. This failure makes it impossible to determine that the plans are not **endangering** the long-term health, vigor and/or ecological services provided by balanced and viable mountain lion populations.

NDOW has not updated the statewide Mountain Lion Management Plan since 1995, a deplorable 20 years over which the status of the State's most significant predator has not been comprehensively assessed.

The 2016 and 2017 plans do not consider or cite mountain lion research that has been conducted in the State of Nevada by Alyson Andreasen in the north, or David Choate to the south, or at the Nevada Test Site, all of which provide the most relevant and up-to-date information about mountain lions in Nevada. This omission, of research conducted within Nevada itself and with the cooperation of NDOW, is indicative of NDOW's lack of regard for the best available science in developing these plans.

In addition, the 2016 and 2017 plans do not build on the knowledge gained from prior lethal removal activities. The compilation, peer review and reporting of the results of prior removal activities, including clear measures of their efficacy in achieving desired objectives, are required by Policy #23 to be an integral part of planning for any new activities.

Lack of funding or available personnel is no excuse for failing to meet the Commission's own standards, given that these funds are available through the Predator Program itself.

On behalf of our Nevada members and supporters, the Mountain Lion Foundation respectfully requests that:

(1) PARC NOT approve the 2016 and 2017 Predator Management Plans as currently proposed, and
(2) PARC return the 2016 and 2017 Predator Management Plans to NDOW for changes and further elaboration, with the specific suggestion that the Nevada Board of Wildlife Commissioners urge that the Department use 2016 and 2017 funding to:
(a) develop and/or update a current Nevada Mountain Lion Conservation and Management Plan, and
(b) compile, analyze, provide for peer review and report on the efficacy of prior lethal removal efforts.

If the PARC elects to move forward with the 2016 and 2017 Predator Management Plans as currently proposed, Mountain Lion Foundation respectfully requests that they do so with the caveat that the lethal removals required by the plan be considered within the broad context of the many causes of mountain lion mortality in Nevada, and with the suggestion to the Nevada Board of Wildlife Commissioners that they set the annual mountain lion hunting quotas to zero, unless and until NDOW develops and/or updates a current Nevada Mountain Lion Conservation and Management Plan, and (b) compiles, analyzes, provides for peer review and reports on the efficacy of prior lethal removal efforts.

Sincerely,

Lynn Cullens
Associate Director
MOUNTAIN LION FOUNDATION

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Date / /

Sam Sanders - for the Record

I ask this committee to encourage private industry predator Management opportunities in proportion to the increase in Bureaucracy & regulations involved in predation and rodent control.

Thanks to NDA in regards to their work with zinc phosphide.