

December 20, 2024

Mr. Joseph Moxey, APHIS' Paperwork Reduction Act Coordinator
Docket No. APHIS-2024-0053
Regulatory Analysis and Development
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Re: Docket No. APHIS-2024-0053; Notice of Request for Approval of an Information Collection; A Survey of Livestock Producer Perceptions of Predators and Predator Damage Management Methods

Dear Mr. Moxey and Dr. Cross:

Thank you for this opportunity to comment on the above-referenced matter. On behalf of the Humane Society of the United States, the Humane Society Legislative Fund, and our members and supporters, we welcome U.S. Department of Agriculture-Animal and Plant Health Inspection Service-Wildlife Services' (USDA-APHIS-WS') initiative to test the social science concerning "several nonlethal predator damage management methods on livestock operations in 12 States (Arizona, California, Colorado, Idaho, Michigan, Minnesota, Montana, New Mexico, Oregon, Washington, Wisconsin, and Wyoming)."

A recent article by Carisle et al (2023) sheds promising light and should inform this effort.¹ (Screenshot of Table 1 from Carisle et al. (2023) below.) In addition to the non-lethal methods tested in *Carlisle*, livestock carcass mitigation (e.g., burial, removal, lye treatment) must also be considered. New research indicates innovative methods to protect livestock from large-bodied cats using studded-leather collars.² And in their study evaluating low-stress livestock handling (acronymized as "L-SLH"), Louchouart and Treves (2023) report that:

Our experiment shows that one can graze thousands of cattle safely on vast public lands hosting grizzly bears and wolves when owners use L-SLH as a method to reduce the vulnerability of domestic animals. We conclude that L-SLH joins a growing number of non-lethal, carnivore control methods proven effective by gold standard experiments.³

Other benefits conferred from low-stress livestock handling and range riding include quickly finding and removing cattle who die from maladies, birthing problems, or lightning strikes that could attract native carnivores, as well as observing and managing other problems affecting the herd in a timely manner.⁴



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Table 1. Perceived effectiveness of predator management methods.

Method	# Who Used (# Who Rated Effectiveness)	Mean Effectiveness Score	% Ineffective/Effective				
			Ineffective	Somewhat Ineffective	Neither	Somewhat Effective	Effective
Trap and kill	12 (11)	4.55	0	9	0	18	73
Snares	5 (4)	4.50	0	0	25	0	75
Ground shooting	6 (6)	4.33	0	0	17	33	50
Range riders	14 (11)	4.09	9	0	0	55	36
Guardian animals	9 (7)	4.0	0	0	29	42	29
Aerial gunning	4 (3)	4.0	0	0	33	33	33
Electric fencing	14 (12)	3.58	25	0	8	25	42
Fladry	17 (14)	3.50	22	14	7	7	50
Nonelectric fencing	9 (6)	3.50	33	0	0	17	50
Trap and release	6 (6)	3.33	0	33	17	33	17
Other audio/visual deterrents	10 (9)	2.67	34	11	22	22	11

Also, in light of the litany of exposés by National Public Radio and others⁵ coupled with the research on Americans' changing values systems,⁶ it is appropriate for the USDA-APHIS-WS to shift gears and ask questions of livestock producers concerning non-lethal deterrents so as to stop the constant native carnivore killing, which is expensive, controversial, and harmful to individuals, families, populations, and ultimately to ecosystems.⁷ If left un-persecuted, top carnivores could reduce chronic wasting disease that is rampantly spreading in wild cervid populations not only in the U.S. but now in Canada and Europe; mitigate deer-vehicle collisions saving lives and millions in societal costs; and contain feral hog and wild horse populations among various other ecosystem services.

Finally, in response to the claim in this Federal Register notice that: "Depredation of livestock by large predators, such as wolves, bears, and mountain lions, *is a significant source of human-wildlife conflict* and economic losses in the United States," we soundly refute those notions. We found, by far, the greatest source of livestock losses come from *non-predator* causes—especially respiratory and birthing problems,⁸ and further, human-bear interactions require that humans change their behaviors such as avoiding attracting bears to homes, ranches, campgrounds and more.⁹

All of the articles we cite here are considered part of the administrative record. They are available to the government upon request. Please feel free to reach out to us with questions or comments.

Thank you again for this opportunity to comment.

Sincerely yours,

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Endnotes

- ¹ Keith M. Carlisle et al., "Producers' Perceptions of Large Carnivores and Nonlethal Methods to Protect Livestock from Depredation: Findings from a Multistate Federal Initiative," *Human Dimensions of Wildlife* 28, no. 4 (2023).
- ² Igor Khorozyan et al., "Studded Leather Collars Are Very Effective in Protecting Cattle from Leopard (*Panthera Pardus*) Attacks," *Ecological Solutions and Evidence* 1, no. 1 (2020).
- ³ Louchouart, N. X., & Treves, A. (2023). Low-stress livestock handling protects cattle in a five-predator habitat. *PeerJ*, 11, e14788, page 14.
- ⁴ *Id.*
- ⁵ Chiara Eisner and Nick McMillan, "'That's a Bloodbath': How a Federal Program Kills Wildlife for Private Interests," NPR.org (Oct. 10, 2024). Tom Knudson, "The Killing Agency: Wildlife Services' Brutal Methods Leave a Trail of Animal Death," *The Sacramento Bee*, April 29, 2012; Christopher Ketcham, "America's Secret War on Wildlife: A Federal Agency Keeps the West Safe for Cows by Killing Coyotes, Wolves, Bears, and Pet Dogs," *Men's Journal* 16, no. 12 (2008).
- ⁶ Rebecca Niemiec et al., "United States Resident Survey on Animal Protection Issues and Policy Solutions," *Colorado State University - Animal-Human Policy Center* (2024); Kelly A. George et al., "Changes in Attitudes toward Animals in the United States from 1978 to 2014," *Biological Conservation* 201 (2016); M. J. Manfredo et al., "America's Wildlife Values: The Social Context of Wildlife Management in the U.S.," ed. National Report from the research project entitled "America's Wildlife Values" (Fort Collins, Colorado: Colorado State University, Department of Natural Resources, 2018).
- ⁷ The Humane Society of the United States, "Wildlife Disservice: The USDA Wildlife Services' Inefficient and Inhumane Wildlife Damage Management Program," (2015); Wendy Keefover-Ring, "War on Wildlife: The U.S. Department of Agriculture's "Wildlife Services": A Report to President Barack Obama and Congress," (2009).
- ⁸ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle and Sheep Industries," https://www.humaneociety.org/sites/default/files/docs/Cougar-Livestock-6.Mar_.19-Final.pdf (2019); "Government Data Confirm That Wolves Have a Negligible Effect on U.S. Cattle and Sheep Industries," https://www.humaneociety.org/sites/default/files/docs/HSUS-Wolf-Livestock-6.Mar_.19-Final.pdf (2019); "Government Data Confirm That Grizzly Bears Have a Negligible Effect on U.S. Cattle and Sheep Industries," https://www.humaneociety.org/sites/default/files/docs/HSUS-Grizzly-Livestock_6.Mar_.19-Final.pdf (2019); Peter Kareiva et al., "A New Era of Wolf Management Demands Better Data and a More Inclusive Process," *Conservation Science and Practice* (2022).
- ⁹ C. W. Lackey et al., "Human-Black Bear Conflicts: A Review of Common Management Practices. Human-Wildlife Interactions," *Monograph* 2 (2018); Igor Khorozyan and Matthias Waltert, "Variation and Conservation Implications of the Effectiveness of Anti-Bear Interventions," *Scientific Reports* 10, no. 1 (2020); E. J. Howe et al., "Do Public Complaints Reflect Trends in Human-Bear Conflict?," *Ursus* 21, no. 2 (2010); M. E. Obbard et al., "Relationships among Food Availability, Harvest, and Human-Bear Conflict at Landscape Scales in Ontario, Canada," 25 (2014); Joseph M. Northrup et al., "Experimental Test of the Efficacy of Hunting for Controlling Human-Wildlife Conflict," *The Journal of Wildlife Management* (2023).

Sources cited in alphabetical order – all documents here are available upon request

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