

August 7, 2006

Director, Wilderness and Wild and Scenic Rivers Resources
U.S. Department of Agriculture, Forest Service
201 14th Street, SW
Washington, DC 20250

Dear Director:

The Arizona Wildlife Federation (AWF) is a non-profit organization dedicated to educating, inspiring, and assisting individuals and organizations to value, conserve, enhance, manage, and protect wildlife and wildlife habitat. **We are requesting a 30-day extension for public comment** on the Forest Service rule published in the June 7, 2006 Federal Register at Volume 71, page 32915. The basis of our request for an extension of public comment lies with the considerable confusion regarding the need for the new rule.

First, the AWF adamantly opposes the use of poisons of any kind, including baits, M-44s, and livestock collars containing poisons. The proposed rule appears to contain changes that increase the conditions under which predators may be killed in federally designated wilderness areas and on Forest Service research natural areas, including the use of hidden sodium cyanide traps within wilderness areas for the first time, a reversal of the current prohibition of these devices.

Our understanding is that the federal government already may trap or shoot coyotes, bears, and other predators in wilderness areas and research natural areas under restrictive conditions. Such activities may only occur with case-by-case authorization from the Regional Forester. If the Regional Forester does authorize the killing of a predator in a wilderness area, the government hunter may only target a specific, individual animal. Further, the killing must be necessary to protect human safety, endangered species, or to prevent serious livestock losses. The activities may not be accomplished with poison baits or cyanide guns. **It is unclear as to why these activities need additional authorization.**

We would appreciate clarification regarding Section 1(c) authorizing collaborative groups to set management goals and objectives for wildlife populations. Does this mean that, for the first time, predator control objectives in wilderness will be set not by federal authorities, but by whatever private individuals have the ability or financial incentive (e.g., livestock interests) to form or attend a proposed "collaborative group"?

The new rule appears to expand trapping, poisoning, and aerial gunning of bears, bobcats, coyotes, foxes, mountain lions, wolves, and other animals in federally designated wilderness areas and research natural areas on Forest Service lands. Is this true? Predators play a vital ecological role. A significant and growing body of scientific literature demonstrates that large

carnivores are “keystone species” that contribute strong, ramifying interactions, the strength of which are disproportionate to their population densities and not wholly duplicated by other species (Soulé et al 2003). Keystone species can be thought of as having the highest per capita interaction strengths. Large carnivores are further considered by leading conservationist scientists as “strongly interactive, that is, their virtual or effective absence leads to significant changes in some feature of its ecosystem (Soulé et al. 2003; 2005). Such changes include structural or compositional modifications, alterations in the import or export of nutrients, loss of resilience to disturbance, and decreases in native species diversity (Soulé et al. 2003; 2005). This essential role is not, but should be, addressed in any provision regarding the control of these species.

It appears that under the new rule, animals need not be implicated in livestock depredations in order to be targeted by predator control operations in wilderness areas. Is this true?

It has been charged that predator control activities authorized by the new rule would allow helicopters, fixed-winged aircraft, and vehicles like motorcycles and snowmobiles. Is this true?

Finally, we would greatly appreciate an extension for comment that would provide the public an opportunity to clear up what would and would not be accomplished by the proposed rule change.

Respectfully Submitted,

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References:

Soulé, Michael E., James A. Estes, Joel Berger, and Carlos Martinez Del Rios. 2003. Ecological Effectiveness: Conservation Goals for Interactive Species. *Conservation Biology* 17(5):1238-1250

Soulé, Michael E., James A. Estes, Brian Miller, and Douglas L. Honnold. 2005. Strongly Interacting Species: Conservation Policy, Management, and Ethics. *BioScience* 55(2): 168-176,