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December 1994

The Probe, Issue # 150 -- December 1994

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Raccoon Rabies Epizootic – United States 1993

This article is reprinted in part from the Centers for Disease Control and Prevention's *Morbidity and Mortality Weekly Report*, volume 43(15):269-273, 22 April 1994. The Editors thank NADCA member Sam Linhart for the submission.

Although the incidence of rabies is low among domestic animals in the United States, the recent increase in the occurrence of wildlife rabies has increased the risk for infection of humans. From 1991 to 1992, the number of reported cases of rabies in raccoons increased 40%, from 3079 to 4311. Of the 8644 animals reported rabid during 1992, a total of 3759 (43%) were raccoons of the mid-Atlantic and northeastern states. This report describes the continuing spread of the raccoon rabies epizootic in the mid-Atlantic and northeastern states.

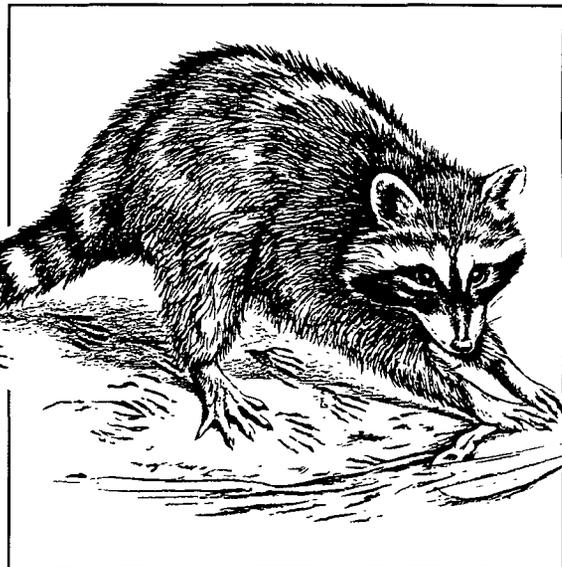
Since the introduction of the raccoon rabies epizootic in the mid-Atlantic region in 1977, cases have been identified in 11 states and the District of Columbia. Cases were first detected in West Virginia (1977) and subsequently in Virginia (1978), Maryland (1981), the District of Columbia (1982), Pennsylvania (1982), Delaware (1987), New Jersey (1989), New York (1990), Connecticut (1991), North Carolina (1991), Massachusetts (1992), and New Hampshire (1992). During January – February 1994, the first cases in Rhode Island were detected in two raccoons and a fox. In the Northeast, only Vermont and Maine remain unaffected by the raccoon rabies epizootic.

In 1990, raccoons surpassed skunks as the species in which rabies was detected most often in the United States, and the number of cases in raccoons continued to increase. Although the raccoon strain of rabies virus has been detected in many species, no known cases have occurred in humans. However, vaccination of dogs and cats remains important for the control and prevention of rabies because these domesticated species may serve as a link in rabies transmission between wildlife and humans.

Rabies control in wildlife through oral vaccination is being evaluated in the United States; this approach has been successful in controlling fox rabies in parts of Europe and in Canada. In April 1992, a program to administer vaccinia-rabies glycoprotein recombinant vaccine orally to raccoons was initiated in Cape May County, New Jersey. Similar programs are being planned that would target raccoons in areas of Massachusetts and New York, coyotes in Texas, and foxes in New York and Vermont. Additional field trials of the oral rabies vaccine should

establish distribution methods, the minimum effective geographic area, bait density, frequency, and time(s) of year for vaccination. These assessments will help determine the cost-effectiveness and appropriate use of oral wildlife vaccination. Population reduction of wildlife rabies reservoirs is not a recommended or cost-effective method for rabies control.

The costs of programs to prevent rabies have increased in parallel with the spread of the epizootic. For example, in New York, which in 1993 recorded the largest number of cases of rabies in wildlife ever reported by one state, the number of



persons receiving post-exposure rabies prophylaxis increased from 84 in 1989 to 2905 in 1993. In New Jersey, private and public expenditures associated with the raccoon rabies epizootic in two counties more than doubled from the pre-epizootic period (\$405,565 per 100,000 population) to the epizootic period (\$979,027 per 100,000 population).

Rabies prevention activities at the state and local levels have been aimed at reducing exposure to rabies-infected animals and insuring proper treat-

Continued on page 4, Col. 1

NPCA Concerned About Competition From ADC for Bird Control Jobs

Earlier this year, the National Pest Control Association's (NPCA) governmental affairs department was alerted by some members in Washington State that the USDA's ADC program was competing with private industry for bird control jobs. Further investigation revealed that pest control operators in other regions of the country had similar concerns.

Although many of NPCA's members are admirers of the ADC program, some were justifiably upset at the prospect of having to compete with a federal agency for bird control jobs. To help resolve this matter, NPCA met with ADC Western and Washington State directors in Olympia, and with ADC administrators Bobby Acord and Don Hawthorne in Washington, D.C. to discuss this matter. In both meetings, ADC was extremely receptive to NPCA's concerns.

[Editors' Note: The above information was developed and provided to The PROBE by Bob Rosenberg, Director of Government Affairs, and Gene Harrington, Manager of Government Affairs, NPCA. Below is an abbreviated version of an ADC policy Directive developed by USDA-APHIS-ADC Deputy Administrator Bobby Acord in August 1994. NADCA members who may wish to comment on the concerns expressed or on the policy are encouraged to contact NPCA at (800) 678-6722 or Don Hawthorne at (202) 720-2054.]

Avoidance of Competition with Private Business – ADC Directive 4.220, USDA-APHIS-ADC

Background

Wildlife is a publicly owned natural resource, and Federal and

State governments are responsible for maintaining healthy, stable wildlife populations. Accordingly, when wildlife causes damage or poses threats to human health and safety, government has an obligation to respond to requests for resolution.

Congress specifically authorized USDA to enter into cooperative agreements with governmental bodies, industries, or affected citizens to deal with damage caused by wildlife. ADC has a long history of involvement with the private pest control industry. ADC provides technical training at state, regional, and national conferences, has developed and registered products for use by industry and the public, and cooperates with private business by applying ADC-specific control methods. During the course of these activities, ADC direct control programs and private business have rarely come into conflict.

Policy

ADC personnel will provide wildlife damage management information and assistance to the public in accordance with the ADC Act [of March 2, 1931, as amended] and other relevant

Continued on page 5

CALENDAR OF UPCOMING EVENTS

January 26-27, 1995: Annual Meeting New York Chapter of The Wildlife Society, Rochester, New York. Theme: "Wildlife and Human Populations in Conflict". Contact: Mark Lowery, NYS Department of Environmental Conservation, SUNY, Bldg. 40, Stony Brook, NY 11790-2356, (516) 444-0305 or Lynn Braband, Critter Control, P.O. Box 19389, Rochester, NY 14619, (716) 235-2530.

February 10-12, 1995: The Wildlife Damage Management Instructional Conference. Presented by Wildlife Control Technology magazine. To be held at the Nordic Hills Resort and Conference Center, Itasca, Illinois. Contact: Peggy, (708) 858-4928.
NADCA Membership Meeting - held in conjunction with this conference. Contact: Scott R. Craven, 226 Russell Labs, Univ. of Wis., Madison, WI 53706, (608) 263-6325.

April 10-13, 1995: 12th Great Plains Wildlife Damage Control Workshop, Doubletree Hotel, Tulsa, Oklahoma. Contact Ron Masters, (405) 744-6432 or Grant Huggins, (405) 221-7277.

July 16-21, 1995: 10th International Conference on Bear Research and Management. University of Alaska, Fairbanks, AK. Contact: Harry Reynolds, AK Dept. of Fish & Game, 1300 College Road, Fairbanks, AK 99701-1599. (907) 452-1531. FAX (907) 452-6410.

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Your contributions to *The Probe* are welcome. Please send news clippings, new techniques, publications, and meeting notices to *The Probe*, c/o Hopland Research & Extension Center, 4070 University Road, Hopland, CA 95449. If you prefer to FAX material, our FAX number is (707) 744-1040. The deadline for submitting material is the 15th of each month. Opinions expressed in this newsletter are not necessarily those of NADCA.

ADC News, Tips, Ideas , Publications . . .

Translocation of Wild Canids Brings Disease Threats

An unvaccinated foxhound that died in December 1993 was confirmed rabid by the Alabama Department of Public Health (ADPH). Information provided to ADPH indicated that the dog belonged to the owner of a "fox running pen" and that the pen owner had imported coyotes from Texas for release into the enclosure. Because ADPH was aware of an ongoing epizootic of a coyote/urban dog rabies virus strain in south Texas, brain samples from the foxhound were submitted to the Centers for Disease Control and Prevention (CDC) for strain typing. Nucleotide sequence analysis by CDC confirmed that the virus in the foxhound was identical to the coyote/urban dog strain of rabies virus present in south Texas and adjacent Mexico.

Upon learning that the dog was rabid, the owner destroyed several other unvaccinated young dogs that were kennel mates with the affected dog. A number of unvaccinated older dogs present at the premise, but kept in a different kennel, subsequently were vaccinated and placed under observation by the ADPH. The ADPH, in consultation with the Alabama Department of Conservation and Natural Resources (ADCNR) and CDC, evaluated options for dealing with the introduction of this new strain of rabies virus. The premise was quarantined, and the owner depopulated coyotes, foxes, and raccoons in the enclosure. The ADCNR prohibits the purchase or sale of live protected wildlife and requires a permit to import protected wildlife.

The detection of the coyote/urban dog strain of rabies virus at a location so distant from its previous geographic distribution is an alarming public health concern. The rabies epizootic in Texas began in 1988 with laboratory-confirmed cases in 6 coyotes and 2 dogs along the Mexican border in Starr County. By mid-1993, the outbreak had spread to 12 south Texas counties, and rabies had been reported in 158 coyotes and 180 dogs. The increasing and expanding coyote populations across much of the southeastern United States raise the potential that the Texas coyote/dog strain of rabies could become established in local coyotes and "spill over" into unvaccinated dogs. There is optimism that the Texas coyote/dog strain of rabies virus was found in time to avoid another explosive wildlife rabies episode; however, a similar scenario involving private sector translocation of raccoons is believed to be the cause of the costly raccoon rabies epizootic that has been spreading in the mid-Atlantic and northeastern regions since 1977.

This is the second documentation of a significant public health risk associated with the importation of wild canids to stock "fox running pens." In 1989, red foxes illegally imported into South Carolina were found to harbor the tapeworm *Echinococcus multilocularis*, which can cause fatal alveolar hydatid disease in humans. The current event re-emphasizes a need for tighter regulations that address such disease potentials.

California Assemblyman Says "Time to Repeal Mountain Lion Initiative"

"She deserved to die! She was jogging in the mountain lion's habitat and she should have known she would be attacked!" This was one of the responses to the recent death of Barbara Schoener, recently attacked and eaten by a mountain lion in California. According to David Knowles, California Assemblyman for the 4th District, this type of comment is typical of animal-rights extremists.

In the October/November issue of *California Hunter*, Knowles stated, "These people are much less interested in promoting safe neighborhoods than they are in defending a fundamentally misguided law — even at the cost of human life."

The law Knowles referred to is Proposition 117, California's so-called "Mountain Lion Initiative" which placed a moratorium on mountain lion hunting. While initiative supporters claim that there have been few documented human deaths from mountain lion attacks over the last 100 years, they don't address the increase in mountain lion sightings. Knowles's office inquired about such sightings at a local office of California Fish & Game. The office reported receiving "hundreds" of calls reporting mountain lion sightings, "but we don't make reports on them because we don't have the money."

According to one Fish & Game lion incident report, a woman was unloading groceries from her car in an apartment complex in El Dorado County when she noticed a mountain lion watching her 30 feet away. She dropped the groceries and ran into her apartment. Concerned about the safety of her three year old, she contacted the authorities who told her that encounters such as these were "uncommon but not unusual." Knowles's response: "Are we to accept being forced into our homes because a few extremist animal-rights activists want to turn our neighborhoods into their own personal wildlife preserve?"

Even some animal rights supporters are beginning to see a need for some wildlife management. In a recent radio show in San Francisco, Mark Palmer of the Mountain Lion Foundation stated that he agreed with the suggestion that there should be periodic thinning of mountain lions to prevent overpopulation.

Knowles strongly believes that voters need to take another look at the failures of Proposition 117.

Editor's Note: On July 16, 1994, PROBE co-editor Robert Timm encountered an adult mountain lion in the driveway of his residence near Ukiah, California, approximately an hour before sunset. The lion was less than 10 feet from the house.

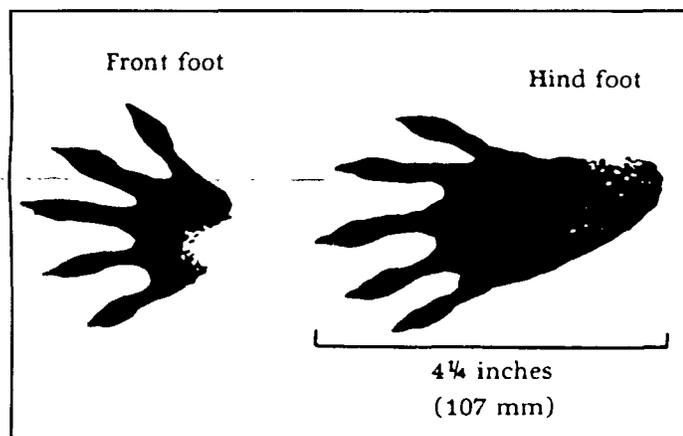


The editors of **The PROBE** thank contributors to this issue: Mike Worthen, Sam Linhart, James E. Forbes, and Wes Jones. Send your contributions to **The PROBE**, 4070 University Road, Hopland, CA 95449.

Raccoon Rabies Epizootic: U.S. 1993

ment when exposure occurs. For example, in some states, vaccination requirements for both dogs and cats have been statutorily mandated. Health departments, in collaboration with veterinary associations and animal control and animal welfare groups, have provided educational materials to the public about wildlife rabies, pet vaccination, and recognition of exposures to potentially rabid animals. Education efforts have targeted veterinarians and physicians because they often are the first to be informed of possible rabies exposures. Below is a state-by-state report of rabies occurrences.

Connecticut. Rabies was first confirmed in raccoons in Connecticut in March, 1991, and subsequently has been confirmed in raccoons in all towns but one west of the Connecticut River. Overall, the rabies epizootic in raccoons has involved six of eight counties and 129 of 169 towns. From 1992 to



1993, the number of confirmed cases of rabies in animals decreased 8% (from 831 to 762). Of the 1256 raccoons tested in 1993, 662 (53%) were positive for rabies. Since 1991, when the first case was detected in a raccoon, 1786 cases have been identified among animals, including 31 cases among domestic animals (22 cats, three dogs, three sheep, two horses, and one cow).

Massachusetts. Rabies was first confirmed in raccoons in Massachusetts in September, 1992, in Ashby, near the New Hampshire border and more than 60 miles north of the nearest cases of raccoon rabies in Connecticut. During 1993, cases were confirmed in animals in 175 (50%) of 351 towns and 10 of 15 counties; cases were not detected in the southeastern counties. Overall, from 1992 to 1993, the number of confirmed cases increased nearly 17-fold, from 42 to 698. Of the 1486 raccoons tested in 1993, 585 (39%) were positive for rabies. Since September, 1992, although most (623) cases have oc-

curred in raccoons, cases also have been detected in skunks (81), cats (14), woodchucks (11), foxes (eight), and cattle (3).

New Hampshire. Rabies was confirmed in raccoons in New Hampshire in April, 1992, in Rumney in midstate. Cases subsequently have been detected in 48 towns in four counties in the southern region of the state. During 1993, 148 animals tested positive for rabies (103 [37%] of 278 raccoons, 32 skunks, five bats, three woodchucks, three cats, one pony, and one rabbit). At least one isolate from each species (except bats) was characterized as the strain associated with the raccoon rabies epizootic. One cat had received one dose of rabies vaccine 8 months before onset of illness.

New York. Rabies was first confirmed in raccoons in New York in May, 1990; since then, cases have been confirmed in animals in 50 of the 62 counties. In 1991 and 1992, rabies was confirmed in 666 and 1392 raccoons, respectively. In 1993, rabies was diagnosed in 2747 animals, comprising 17 species of mammals. Of the 4463 raccoons tested, 2369 (53%) were positive. From 1992 to 1993, the number of persons who received post-exposure rabies prophylaxis increased from 1225 to 2905. In July, 1993, a case of human rabies was attributed to a strain that characteristically infects silver-haired bats.

North Carolina. Since 1990, three distinct epizootics of rabies have occurred in animals in North Carolina: during 1990, the skunk rabies epizootic from the Midwest entered two counties of northwestern North Carolina from Tennessee and Virginia; during 1991, the raccoon rabies epizootic from the Mid-Atlantic entered northeastern North Carolina from Virginia; and during 1992, the raccoon rabies epizootic from the Southeast entered from South Carolina into two regions of south-central and southeastern North Carolina. Since 1990, rabies has been detected in terrestrial animals in 22 of 100 counties; rabies was confirmed in terrestrial animals for the first time in eight of these counties in 1993. The number of rabies cases more than doubled each year during 1992-1993: 24 cases in 1991, 50 cases in 1992, and 106 cases in 1993. During 1993, 71 (18%) of 386 raccoons tested were positive. In addition, the number of rabid domestic animals - eight cats and two dogs - was the highest annual total reported in North Carolina since 1959; none of these animals had been vaccinated against rabies.

State public health departments, state and local governments, CDC, and other federal agencies are collaborating to develop programs to control rabies epizootics. Information about rabies is available from state and local departments and from CDC's Viral and Rickettsial Zoonoses Branch, Division

of Viral and Rickettsial Diseases, National Center for Infectious Diseases; telephone (404)639-1075.

Continued from page 2

Competition from ADC for Bird Control Jobs?

obligations. ADC will not provide direct control services at the same time and same location or tract of land where a private business is employed to provide a similar service. However, ADC may cooperate with a private business engaged in wildlife damage management on a specific project by providing technical assistance or by applying ADC-specific control methods.

ADC will not provide a bid in response to an advertised request for open bids submitted by an entity requesting direct control assistance with a wildlife conflict.

To avoid the appearance of competition with private business, ADC will only provide direct control services after satisfying all the below conditions.

- a. The cooperator requests ADC assistance with wildlife damage resolutions; this may include a request for ADC to submit a proposal as a sole-source provider of service.
- b. ADC has authority to engage in work to resolve a wildlife conflict per cooperative agreement or Memorandum of Understanding with the appropriate state regulatory agency.
- c. ADC discusses the legal and practical methods available to resolve a wildlife conflict. ADC also describes the options available to the cooperator, such as technical assistance and direct control, and other providers of assistance (private, state, and federal).
- d. ADC considers environmental consequences of the proposed activities under provisions of NEPA.
- e. ADC provides the cooperator an accomplishment report at the end of the project, if requested.

*Bobby R. Acord,
Deputy Administrator*

NADCA Information/Techniques Committee Wants YOU

The NADCA Information/Techniques Committee wants YOU. Are you a specialist in managing raccoon damage in the southeast region? Can you answer a special request for elk exclusion in the northwest, or have knowledge of a unique control method for nutria in the south?

Look for a survey in your mailbox this fall. The I/T Committee is creating a list of names. These are to be used as references for NADCA members who need information or have a particular request for techniques. The committee will serve as a clearinghouse for requests, connecting needs for techniques with your expertise!

On the short survey, you will be asked to write in your specialty fields by species and control method, specialized training received and state or region of operation.

The plan is to keep abreast of changes in membership and expertise with a computer-assisted program.

*Dallas Virchow,
Scottsbluff, NE*

Call for Nominations for Berryman Institute Awards

The Jack Berryman Institute for Wildlife Damage Management requests nominations for its new awards program. The awards will recognize superior work directed toward the Institute's goals of enhancing human-wildlife relationships by resolving conflicts between humans and wildlife. The Institute will grant three annual awards: 1) research, 2) communication, and 3) program achievement.

The research award is designed to recognize superior achievement in the creation of new knowledge. This could be based on a journal publication, book, or other scholarly achievement.

The communication award will recognize superior achievement in fostering communication. It can be based on a publication, video, symposium, editorship, book, or other accomplishment that enhances communication.

The program achievement award is designed to reward a superior "hands-on" effort or program that deals with or helps resolve a wildlife damage management problem or a human-wildlife conflict.

To nominate someone, send a letter stating why the nominee is worthy of the award and a copy or description of the nominee's accomplishment. Individuals, organizations, or groups can be nominated for these awards.

Send nominations to: Dr. Michael Conover, Berryman Institute, Department of Fisheries and Wildlife, Utah State University, Logan UT 84322-5210.

The deadline for submissions is 30 January 1995.

Letters to the Editor

Dear Editors:

During this day and time the following request might be inappropriate to current attitudes.

In response to the June 1994 article regarding ethics, those who have joined ADC since 1980 would be enlightened by George Rost's presentation in Washington, D.C. of April 25 of that year. His account is detailed in the May 1980 issue of **The PROBE**.

The standard of ethics and examples should begin at the top.

Respectfully,
Monte M. Dodson
Cookson, Oklahoma

Editors' Note: Below is reproduced, with only minor editorial changes, the article by George S. Rost as it appeared in the May 1980 PROBE (Issue #6). In addition to making the point about ethics mentioned by Mr. Dodson, the article demonstrates how far ADC has come during the last 15 years.

Well! At Least We Told 'Em How It Is

George S. Rost

I attended the oversight hearings before Senator Simpson in Washington, D.C. on April 25th as a representative of NADCA mostly at my own expense. In my presentation, which will be printed in the proceedings of the hearings, I pointed out the ADC program had always been a source of embarrassment to the Department of the Interior and the Fish & Wildlife Service administrators who felt their mission was to protect wildlife, not kill it. They hoped by ignoring ADC, the problem would go away. When it became evident agricultural interests could not afford to let the program wither away, the Service used the budgetary process to hamstring it. We survived because we managed to get the most out of little money and despite the sniping from all sides, the morale in the field remained high as we could see we were aiding the production of food and fiber in this country. The only reasons USDI stayed with ADC was because the Animal Damage Control Act of 1931 said such a program would be provided. It also specified the Secretary would use the best methods available to accomplish this mandate. It is obvious in his recent policy statement regarding 1080, denning and reduction in aircraft and other lethal methods that the Secretary is not following Congress' intent and these are oversights in the Department's conduct of the ADC program with which Congress should be concerned.

In 1971-72, the Defenders of Wildlife (DW) brought suit against Interior to have it shut down the ADC program. The court ruled against DW on the grounds there would be more

harm to the environment if the program was stopped than if it were allowed to continue. However, Interior made a secret deal which was kept sealed for two years. The deal was that if DW would drop further suit, an Executive Order would be issued banning toxicants. Thus Executive Order 11643 was issued banning the use of toxicants for predator control on federal lands. Bills have also been submitted to transfer ADC responsibilities to the states, but these died quietly in Congress. However, in anticipation the Department dropped 66 manpower ceilings from the ADC program. When the bills failed, these ceilings were not returned. When the Office of Management & Budget realized this, they returned the 66 ceilings to the Department. Actually only 26 of these went to the ADC program. The rest were used to cover expansion of the Washington Directorate and staff new programs. Now the Regions are telling ADC to further reduce force to get within ceilings.

The executive order added a new financial burden to the program by eliminating the use of toxicants which are more efficient and less expensive than mechanical methods of control. Interior claimed additional monies would be available for more aircraft and personnel needed to fill this gap. But it was not until 1975-77 through pressure brought on by the Department of Agriculture that budgetary relief was obtained. Additional monies for research came not from Interior but from EPA.

Further dilution of ADC effort was the adoption of "management objectives" by the Service. This allowed the Secretary to ignore the mandate of 1931 and decide on his own how much ADC effort would be funded. Supposedly this was to work from the ground up, but in this case, the Director told ADC it had so much money — so fit a program within those limits. These funds ignored inflation and the actual needs of the program. The reason given for the static budget was supporters of ADC would see to it there was a Congressional add-on later in the year. While Congress did raise this add-on, the money was budgeted quarterly so ADC had to work with skimpy funds for three quarters and then have too much to utilize wisely in the last quarter.

Even further dilution took place when FWS created area offices within each region. This was supposed to bring decision-making closer to the people. They were to be staffed with no more than 7 positions. Today each has 35 to 40 positions, but many offices have no staff member with ADC expertise. Yet State ADC Supervisors must go to area offices for direction. As the area officers have no expertise in ADC they buck it on to the Regional offices. In other words, a useless layer of fat has been added at the expense of the field. This despite assurances to Congress that funding for area offices would not come from the field stations. They were right — funds were raked off at Washington and Re-

gional levels before they ever reached the field.

Further downgrading of ADC is shown in personnel policies by the USFWS. Qualified ADC field personnel are passed over for Washington and Regional office positions even in ADC activities. Twice now the program coordinator position in Washington has been filled with a non-ADC person. It is not a bright future for qualified young ADC managers when they know beforehand they are considered second class citizens because they believe in what they are doing.

NADCA is extremely concerned with the apparent reliance of the Secretary on the Council of Environment Quality personnel. These people have no knowledge of predator problems and lack the experience to make creditable recommendations. The wife of a former council member is a Director in the Defenders of Wildlife. It is understandable why protectionist recommendations are being made to the Secretary. Andrus appointed Ms. Cynthia Wilson to supervise the ADC program. Her credentials as a "biologist" are Vice President of the Animal Welfare Institute. She has consistently blocked correspondence prepared for the Secretary by ADC personnel with her nitpicking, protectionist attitude. An example of how she hamstringing the Washington, D.C. staff is making them change such statements as "Rancher John Doe had 8 sheep killed by coyotes" to "Rancher John Doe said he had 8 sheep killed by coyotes."

The ADC program is conducted in each state under enabling legislation by the states. Thus a Master Cooperative Agreement is in force in each state with an ADC program. As these agreements were negotiated mutually with two to four State agencies, it is inconceivable that the Secretary would take unilateral action to drastically change the conditions of these agreements. But this he has done in eliminating tools and techniques specified in these agreements without renegotiating. This action has nullified a close working relationship of fifty to sixty years duration. This may make the protectionist groups happy, but it may backfire on them. If the various State Departments of Agriculture feel they don't need the USFWS jellyfish any more, the protectionists will have to develop inside contacts in each State as they have in Interior and the Service. This won't be easy.

The timing of implementation of Andrus' new policy needs clarification. Andrus is telling people he will not restrict the use of traps, M-44s, etc. until effective non-lethal tools are available. But the Service is switching to an extensive type program. Budget reductions are taking place and \$1,000,000 is going from operations to research. So either his directions are being ignored or he is talking out of both sides of his mouth.

USFWS Region I Director decided to make brownie points and show Andrus how his policy can work. He appointed a task force to put together a computer model of the policy and test it out in an operational program. One of the immediate problems they encountered was the lack of clarification of definitions by

Andrus on such minor items as "level of acceptable losses" which Andrus tosses around carelessly. Thus the task force decided *they* would define these so they could get on with their assignment. To have one Region proceed with a new policy based on their interpretation will cause chaos throughout the total program. Mr. Andrus had better check on what is happening. It is not good management to get a policy on line in a computer before whatever passes as "management" has defined that policy precisely.

In conclusion, NADCA suggests the following approach for the ADC program:

ADC personnel should tighten up any loose ends on field use of operational procedures. Economy measures should be taken on the conduct of the program, i.e., assignment of personnel, use of aircraft, utilization of all control techniques when practical and request additional ceilings to obtain the proper supervisor-District Field Assistant (DFA) ratio.

The Director should recognize ADC as a valid wildlife management tool. Proper and adequate budgeting should be undertaken, returning ADC ceilings diverted to other programs and issuing a strong directive to all Service personnel, especially the Washington Directorate, that the taking of surplus or offending birds and mammals is a part of wildlife management.

The Secretary of the Interior should recognize the confusion he has created by not providing details of his policy when issued and should have all plans by USFWS held in abeyance until more direction is provided. Any task force to review the ADC program should have either the Chief of the ADC program or one of his staff on the task force. Any review presently made of ADC where ADC was not represented should be discarded. Mr. Andrus should support all the programs legislated to his Department and not pick and choose which ones he will carry out.

The Legislature should look closely at the intent of the Act of March 2, 1931 and determine which Department of the Executive Branch can best carry out the mandate of the Act. Based on past performance, NADCA recommends the transfer of the ADC program to the Department of Agriculture.

At the conclusion of the oversight hearings, Senator Simpson stated that the overwhelming preponderance of evidence clearly shows that Secretary Andrus' policy was ill-advised and he should be told to cease and desist in its implementation.

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Membership Application

NATIONAL ANIMAL DAMAGE CONTROL ASSOCIATION

Mail to: Wes Jones, Treasurer, Route 1 Box 37, Shell Lake, WI 54871, Phone: (715) 468-2038

Name: _____ Phone: (____) ____ - ____ Home

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Additional Address Info: _____

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| <input type="checkbox"/> USDA - Extension Service | <input type="checkbox"/> ADC Equipment/Supplies |
| <input type="checkbox"/> Federal - not APHIS or Extension | <input type="checkbox"/> State Agency |
| <input type="checkbox"/> Foreign | <input type="checkbox"/> Trapper |
| <input type="checkbox"/> Nuisance Wildlife Control Operator | <input type="checkbox"/> University |
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