THE WILDLIFE SOCIETY

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Project Managers, Feral Swine EIS
USDA APHIS-Wildlife Services
732 Lois Drive
Sun Prairie, WI 53590

RE: Docket Number APHIS-2013-0031-0063, Environmental Impact Statement, Feral Swine Damage Management

Dear Feral Swine EIS Project Managers,

The Wildlife Society thanks you for the opportunity to review and provide comments on the Draft Environmental Impact Statement for Feral Swine Damage Management. We support the preparation of the Environmental Impact Statement on Feral Swine Damage Management by USDA-APHIS to address the need for a national program to manage feral swine populations.

The Wildlife Society (TWS) was founded in 1937 and is a non-profit professional society representing nearly 10,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

These comments were developed by experienced professionals in The Wildlife Society's Wildlife Damage Management Working Group, on behalf of the entire Society. The working group is composed of subject matter experts in wildlife population management, wildlife diseases, and wildlife damage management and we encourage USDA-APHIS to call on those experts as needed to supply input into the development of the EIS.

Feral swine pose significant threats to the integrity of natural ecosystems. Rooting and/or vegetation trampling by feral swine can have significant negative impacts on plant and wildlife communities. Feral swine are predators on native species such as ground nesting songbirds, endangered sea turtles (nest predator), many plants, reptiles, small mammals and game species such as bobwhite quail and wild turkey (nest predator). They occasionally prey on livestock. They compete with native wildlife for food resources – plants and mast. They harbor significant diseases and pose a disease risk to humans, domestic livestock, pets, and native wildlife. They pose a significant threat to the health of native wildlife populations on islands.

Feral swine are directly or indirectly responsible for hundreds of millions of dollars in damage to agriculture. They destroy crops, wildlife habitat (food plots), irrigation equipment, fences, pasture, ponds and water structures. They destroy urban and suburban landscapes, parks and golf courses. They pose a direct hazard to humans from vehicle collisions.

Feral swine management is complicated by their adaptability to various habitats and ecosystems, their nomadic movements, their diverse food habits, and lack of predators. Feral swine are treated differently among states. They are game animals in some states, nuisance animals in some states, and are not regulated in other states. Such a diverse and often conflicting legal status complicates the management of feral swine populations.

In light of these complex issues, we recognize that the problem of feral swine will not be eliminated in the short term. Solutions to the problem will be complex, expensive, and need a patient and long-term view to achieve sustainable results. The TWS Position Statement on Feral Swine clearly states "the greatest threat that feral swine impose is in areas where their presence is a relatively new phenomenon." Further, the position statement is emphatic in stating "Emphasis should be on control and/or eradication and stopping illegal releases in these states with newer populations that may not be permanently established yet. In these areas, eradication is, and should be, the goal."

We have reviewed the Draft Environmental Impact Statement (DEIS) and offer the following comments:

1. We believe Alternative 2 (the APHIS preferred alternative) could create unnecessary additional bureaucracy by increasing so-called baseline capacity in all states. This would dilute the amount of resources available nationally to provide highly targeted control and eradication activities in states or portions of states with the newest feral swine populations, and therefore the highest chance of success. Increased baseline capacity could waste valuable, limited resources by uniformly distributing available resources to states with long-term, chronic, and virtually unsolvable feral swine problems. A better approach would be the strategic allocation of resources to those areas with novel or potential feral swine populations in order to prevent the spread and establishment of the species in new areas.

2. We support the selection of Alternative 4 as a more effective alternative. Alternative 4 improves upon Alternative 2 by addressing the same issues (see Table 2-1 in DEIS) and expanding support to states with the highest priority and strategic local project areas. This would greatly increase the potential to achieve control and eradication in those areas with new, naïve feral swine populations that are in the earliest stages of population expansion. These populations would be the easiest to control and eliminate. We believe Alternative 4 would show the greatest immediate success in feral swine management without diminishing overall national feral swine damage management because it would still allow low priority states to continue current feral swine management operations (with existing cooperator agreements) while sending much-needed resources to the highest priority areas (States, Territories, and Tribal lands).

3. A priority system as proposed under Alternative 4 would direct currently available resources to areas with high probability for immediate success. Future funding could be directed to states with established populations once emerging populations in new areas have been eradicated. Alternative 4 could also direct scarce resources to high priority areas – even if located in low priority states – if successful eradication is likely. For

instance, eliminating feral swine from a barrier island (high priority area) would be possible even if the island were in a low priority state.

4. Alternative 4 proposes some limited increase in research and outreach activities. We recommend this increased research and outreach be targeted toward land-grant universities using the existing cooperative extension system in partnership with state agencies to facilitate information transfer to landowners, farmers, producers, and other stakeholders with an immediate need for relief from the severe economic damage caused by feral swine. Research needs and public outreach strategies should be identified in cooperation with the state agency to increase efficiency of control and management efforts.

Thank you for considering the recommendations of wildlife professionals and working to reduce the impacts feral species have on native wildlife populations. Please contact Keith Norris, Assistant Director of Government Affairs at (301) 897-9770 x309 if you require further information or have any additional questions.

Sincerely,

Rick Baydack, President
The Wildlife Society

Enclosed: The Wildlife Society Final Position Statement on Feral Swine in North America

TWS Wildlife Damage Management Working Group Members who contributed to the development of these comments:
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