



THE WILDLIFE SOCIETY

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11 June 2013

Dr. Kimberly Wagner
Project Manager
Feral Swine EIS
USDA APHIS-WS,
732 Lois Drive,
Sun Prairie, WI 53590.

RE: Scoping Comments for EIS on feral swine damage management

Dear Dr. Wagner,

The Wildlife Society (TWS) along with the Wildlife Damage Management Working Group (the Working Group), a Wildlife Society subunit, offer the following comments on the development of an Environmental Impact Statement (EIS) on feral swine damage management pursuant to the notice published in the Federal Register on Monday, 13 May 2013 (Vol. 78, No. 92, pages 27937-27939). We support the preparation of the EIS on Feral Swine Damage Management by USDA-APHIS to address the need for a national program to manage feral swine populations.

TWS was founded in 1937 and is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

The Working Group's mission is to promote better understanding of the challenges of managing human-wildlife conflicts. The Wildlife Damage Management Working Group is the largest working group of TWS and is composed of subject matter experts in wildlife population management, wildlife diseases, and wildlife damage management.

Feral swine pose significant threats to the integrity of natural ecosystems. For example, in coastal marsh areas dependent on levees, terraces, and other hydrologic contouring to restore fragile biotic communities, rooting and/or vegetation trampling by feral swine can have significant negative impacts on plant and wildlife communities. Feral swine damage and degrade habitat of native species such as ground nesting songbirds, endangered sea turtles, many plants, reptiles, small mammals and game species such as bobwhite quail and wild turkey. Feral swine prey on native wildlife and occasionally on small livestock, and regularly compete with native wildlife for food resources. Feral swine pose a serious health risk and harbor diseases that pose a threat to humans, domestic livestock, pets, and native wildlife. Significant attention should be paid to the health risk posed to native wildlife populations on islands. Feral swine are directly or indirectly responsible for hundreds of millions of dollars in damage to agriculture. Destruction of

crops, supplemental wildlife habitat, irrigation equipment, fences, pasture, ponds and water structures have been attributed to the feral swine. Damage from swine has been documented in the suburban and urban landscape, 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, nomadic movements, 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 enjoy no legal protection in other states. Such a diverse and often conflicting legal status complicates the management of feral swine populations.

Removal of feral swine will result in many benefits to society including improved financial returns from farming and ranching operations, improved ecosystem health, reduced competition with native plants and wildlife, and reduced risk of zoonotic disease outbreaks. Implementation of control and eradication should begin at the periphery of the range and in locations where feral swine are localized. Eradication and control should be based on the best available science and technology for the most effective management outcomes.

We strongly urge APHIS to consider a multi-faceted approach to this problem and to use an integrated pest management strategy while doing everything possible to limit negative effects on non-target native wildlife. This must include research and application of existing knowledge but also a strong outreach/public education component to inform citizens and stakeholders of activities, progress, and future options. We encourage APHIS to work with State and County Cooperative Extension Service personnel to deliver a consistent public education program and to ensure suitable cooperation from the locally affected public.

In considering the national feral swine management initiative, The Wildlife Society strongly encourages USDA-APHIS to consider the following:

- Use all available resources and the best current scientific knowledge to address the problem of overabundant feral swine populations.
- Consult with subject matter experts outside APHIS-Wildlife Services utilizing the fullest range of national and international expertise including federal, state, university, and private experts.
- Acknowledge the existence and encourage the incorporation of position statements from professional organizations (such as The Wildlife Society's position statements on Invasive Plants and Animals, Feral Swine in North America, Wildlife Damage Management and Wildlife Disease) and incorporate those positions or policy statements – as appropriate – into the national management plan and EIS document.
- Encourage partnerships to not only focus on feral swine management and eradication, but also outreach efforts to illustrate that damage is not just to wildlife habitat, but also to agricultural lands, and disease transmission to people, livestock, pets and wildlife.
- Consider all reasonable alternatives for addressing the issues of feral swine management including preventing the spread of this invasive species to new habitats and eradication from existing habitats where feasible.

- Evaluate the economic impact of the commercialization of hunting feral swine in wild situations and in enclosures, and the incidental escaping of swine from enclosures into the wild in each state. Additional economic analysis may need to address the impact of reduced feral swine populations on the potential reduction of disease transmission to people, livestock, pets and wildlife.
- Recognize the complex nature of feral swine management across the diversity of federal, Tribal, state, and local jurisdictions and work with all partners to formulate productive, effective, and innovative solutions to the problems of feral swine management and eradication as appropriate.

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. Thank you very much for your consideration of our perspectives. If you have any questions, please contact Terra Rentz, TWS Deputy Director of Government Affairs at 301.897.9770 or terra@wildlife.org.

Sincerely,

A handwritten signature in cursive script that reads "W. B. Kessler".

Winifred B. Kessler
President