



Regional Director
US Fish and Wildlife Service
Region 5 Office
300 Westgate Center Dr.
Hadley, MA 01035-9589

February 24, 2003

Dear Region 5 Regional Director:

I am writing on behalf of the Raptor Research Foundation (RRF) to comment on the APHIS request for permission to kill up to 4,000 vultures per year in Virginia. The Raptor Research Foundation is an international, non-profit, professional scientific organization comprised of more than 1,000 resource managers, scientists and other raptor enthusiasts. The mission of the organization is "to stimulate the dissemination of information concerning raptorial birds among interested persons worldwide and to promote a better public understanding and appreciation of the value of birds of prey." When decisions are made that affect the conservation of raptors, the RRF values sound conservation planning based on quality research and scientific accuracy.

We understand that large concentrations of vultures occasionally cause property damage or other problems for people, and we are sympathetic to those incurring losses. We also understand that lethal control may be the only effective way to decrease damage in some cases. On the other hand, we believe vultures also have intrinsic, sanitation, cultural, ecological and esthetic values that should be considered in any management program.

We are concerned about the number of vultures the Virginia Wildlife Services proposes to kill. Black vultures and turkey vultures are long-lived species with low reproductive rates. Such species are sensitive to increases in mortality. Thus, what could appear to be several local control programs could turn out to substantially reduce vulture populations over large areas. If the pattern requested by the Virginia Wildlife Services were to be adopted by other states, we could have large-scale negative impacts on the entire national vulture population. We note that, according to APHIS's 1994 Environmental Impact Statement on its animal damage control activities, the nationwide take of vultures by APHIS in 1989-1991 was only 157 birds. According to the 2002 Environmental Assessment, 159 vultures were taken by Wildlife Services in Virginia in 2001. In FY 2002, Wildlife Services' take of vultures increased 2.5-fold to 562. The

agency now is seeking authorization from the U.S. Fish and Wildlife Service to increase the annual take to approximately six times the 2002 level and 24 times the highest historical level of lethal removal. Thus, the Virginia request represents a monumental increase in the requested kill. Paradoxically, we also note that local kills often can be ineffective at reducing damage because of rapid immigration of new vultures. This is especially true when control targets random birds rather than the individual birds actually causing damage.

In the Environmental Assessment (EA) for Wildlife Services' proposed vulture removal activities in Virginia, the agency justified their requested take levels based on two main premises: (1) the conclusion that impacts to vulture populations will be low because vulture populations are increasing (although the EA points out that quantitative population information is "non-existent"); and (2) the assumption that requests to Wildlife Services for vulture depredation assistance are expected to increase. However, these qualitative and somewhat speculative statements do not justify increasing the level of lethal removal to 4,000 vultures per year, nor do they make the case that this take level will not adversely impact vulture populations on a larger scale.

Further, Wildlife Services' own examples of prior vulture damage control efforts in Virginia (Section 1.3.7 of the EA) strongly suggest that low-level lethal removal, combined with non-lethal harassment at the roost (where the roost is in proximity to the damage), and selective lethal and non-lethal actions at the site of damage, can be very effective at reducing vulture damage. The EA (FONSI page 10) also discusses additional research by Wildlife Services that is underway, that shows promise in addressing human/vulture conflicts.

For these reasons, we respectfully request that you limit the number of vultures that can be killed in Virginia and other states by all parties to relatively low numbers. We suggest in Virginia that a permit of 250 black vultures and 150 turkey vultures for Wildlife Services (the same as last year) and 50 black vultures and 25 turkey vultures for all other applicants combined, might be a reasonable number. Because this still represents a significant increase over historical (pre-2001) levels, the program should be carefully evaluated at this level for at least a few years before determining that a higher take level is warranted, and any increases should be incremental rather than the exponential increase currently proposed by Wildlife Services. In addition, we hope you will encourage the Virginia Wildlife Services to target only offending birds for lethal control and to expend additional efforts in the research of more non-lethal methods to prevent damage by vultures.

In the long term, satisfactory vulture management will be achieved only if there is a clear plan in hand. Such a plan should be created with input from all stakeholders and should include clear goals and quantifiable, obtainable objectives. While no management plan is likely to please everyone, this plan should be sensitive to the needs and feelings of a wide variety of stakeholders, including farmers, birdwatchers, homeowners and nature lovers. The plan should explicitly state the expected outcomes of actions, both in terms of vulture populations and changes in complaints about vultures. Moreover, the plan

should include an independent science-based program for determining if the expected outcomes are being achieved, including scientifically valid methodologies for obtaining quantitative assessments of vulture populations in the region. Consistent with its responsibility to manage migratory birds, the U.S. Fish and Wildlife Service seems to be the logical organization to coordinate the development of such a plan, which should be made available for public and peer review along with Wildlife Services' annual reports detailing their wildlife control activities.

The Raptor Research Foundation welcomes the opportunity to work with all stakeholders to provide expertise in the biology of vultures and in the management of vulture-related problems. We respectfully request that you inform us of your decision on this permit request.

Sincerely,

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Conservation Committee
Raptor Research Foundation

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