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Proposed Information Collection; Experimental populations "1018-0095"

1 message

Cindy Coping <cpcoping@gmail.com>

Mon, Jan 6, 2014 at 11:47 AM

To: hope_grey@fws.gov

January 6, 2014

Hope Grey
Service Information
Collection Clearance Officer, U.S. Fish and Wildlife Service
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RE: Proposed Information Collection; Endangered and Threatened Wildlife,
Experimental Populations
1018-0095; Federal Register Volume 78, Number 217 (Friday, November 8, 2013)]
[Pages 67185-67186]
[FR Doc No: 2013-26803]

Ms. Grey:

You are seeking information on;

Whether or not the collection of information is necessary, including whether or not the information will have practical utility;

The information collection is obviously necessary because the stated intent of Congress in writing the ESA is that the Service rely **solely** on the best scientific and commercial **data** available. There is no question the data is available to the Service.

The Service must redefine "depredation incident" to mean an attack with visible injuries or death of one domesticated animal or human. The present method of data collection regarding depredation of livestock is inaccurate and under-reported given current Service definitions. The Service is relying on a phony definition of "depredation incident" that obfuscates the true extent of the depredations. Currently the Service is defining one "incident" to include all depredations of livestock, and only livestock, that can occur at multiple locations within a single day. Such reporting serves only to conceal and obfuscate the true extent and cost of depredations, including fatal and nonfatal attacks by nonessential experimental predator populations. This is a dishonest policy that is arbitrary, capricious and violates Congress's clear intent, as indicated without the slightest ambiguity in Section 4 of the ESA, that the ESA be administered based "**solely** on the best commercial and scientific **data** available."

Furthermore, "depredation incident," as currently defined, reports only livestock losses, while depredation losses of, and costly depredation injuries to pets, trained stock dogs, and other species of domestic animals go unreported altogether. This dishonest omission of verifiable data likewise conceals and obfuscates the true cost of depredations. It also violates the 5th Amendment prohibition on uncompensated takings of private property.

Attacks on household pets indicate a clear and present danger to small children and other humans that goes unreported in the current data collection system.

Furthermore, depredations of and attacks on trained livestock dogs, service dogs and hunting dogs represent uncompensated private property takings that can easily amount to tens of thousands of dollars per incident if an incident is properly, accurately and honestly defined as a single predation of any domesticated animal or human. Uncompensated takings of private property, including deaths and uncompensated veterinary bills for domestic animals attacked by nonessential experimental predators, clearly violate the 5th Amendment of the U.S. Constitution

The accuracy of our estimate of the burden for this collection of information;

The burden to citizens of reporting depredations and take is grossly understated. Historically the Service has not responded in a timely enough manner to confirm all reports of livestock depredations, leaving private citizens a burden of repeatedly contacting the Service while having to spend time protecting carcasses so they are not scavenged before authorities arrive on the scene.

Ways to enhance the quality, utility, and clarity of the information to be collected;

The Service must revise its depredation "incident" definition to the following: One depredation incident is one fatal attack or non-fatal attack with visible injuries such as bite marks upon one domesticated animal or one human.

Ways to minimize the burden of the collection of information on respondents.

The Service must respond (meaning an agent must be present at the depredation site) within four hours or less to any depredation report. Citizens must not be harassed, criminally charged or forced to prove their innocence if nonessential experimental predators are taken on private property under claim of self defense or defense of domestic animals.

Sincerely,
Cindy Coping

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Due to the risk of email hacking I never send shortened or masked links to website addresses through email. Be very suspicious of hacker spam if you get a link from me that does not show the website address.