

Congress of the United States
Washington, DC 20515

October 6, 2022

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Haaland,

We thank the Department of the Interior (the Department) for providing written testimony on H.R. 4951, Canyon's Law, for the House Committee on Natural Resources Subcommittee on Water, Oceans, and Wildlife Legislative Hearing on July 21, 2022. As you are aware, H.R. 4951 would ban M-44 devices on public lands, following the lead of states such as Idaho, Washington, California, Oregon, Colorado, and Wyoming, where they are either partially or entirely banned.^{1,2,3} Given that the Department has no objections to H.R. 4951 and is concerned that these devices pose a safety risk to unintended targets, we respectfully ask that the Department use its existing authority to ban M-44 devices on all the public lands under its jurisdiction.

M-44 cyanide ejectors are baited, poisonous devices that are intended as a tool to control wildlife populations, generally coyotes, but also cause significant harm or death to unintended targets. In 2017, a 14-year-old named Canyon was with his dog on Bureau of Land Management lands near his family's home when he accidentally triggered an M-44 device. The device released a cloud of sodium cyanide gas that killed Canyon's dog and poisoned Canyon, who still suffers from the long-term impacts of cyanide exposure. It is likely that he was only spared death due to the direction of the wind at the time. Dr. Mark Mansfield, Canyon's father, shared powerful hearing testimony on the devastating effects that the M-44 device had on his son, noting his excruciating headaches, nausea, vomiting, numbness in his hands, insomnia, and chronic migraines. Dr. Mansfield poignantly stated: "there are no tests for a sublethal dose of sodium cyanide and there is no effective treatment for the irreversible physical effects of cyanide poisoning, much less the accompanying emotional and psychological trauma; yet another reason to protect the public from cyanide bombs and their devastating impacts."

M-44 devices are indiscriminate; it is impossible to control which species will trigger an M-44 and release cyanide poison. In 2012, M-44-related deaths accounted for 11 percent of the non-target animals killed by Wildlife Services.⁴ Between 2018-2021, more than 950 animals were unintentionally killed by

¹ Center for Biological Diversity, Cyanide Bombs (online at www.biologicaldiversity.org/campaigns/cyanide-bombs/).

² Predator Defense, Help Us Ban M-44 "Cyanide Bombs" (online at www.predatordefense.org/m44s.htm).

³ M-44 devices are temporarily banned in Idaho, due to a settlement agreement reached with USDA Wildlife Services, until an Environmental Impact Study is completed. *U.S. agency to limit predator killing methods in Idaho, including 'cyanide bombs'*, Associated Press (June 29, 2022) (online at <https://www.eastidahonews.com/2022/06/us-agency-to-limit-predator-killing-methods-in-idaho-including-cyanide-bombs/>).

⁴ The Humane Society of the United States, *Wildlife Disservice: The USDA Wildlife Services' Inefficient and Inhumane Wildlife Damage Management Program* (2015) (online at www.humanesociety.org/sites/default/files/docs/2015-wildlife-service-white-paper.pdf).

M-44s. This included gray foxes, red foxes, raccoons, Virginia opossums, black bears, dogs characterized as feral, free-ranging and hybrids, skunks, and ravens.⁵

Aside from their significant threat to non-target species, research has shown that M-44s are ineffective in managing canine carnivore populations, their primary purpose. For example, when coyote population numbers fall below a certain threshold, coyotes respond by having larger litters and through in-migration, leading to a population rebound in a few months.⁶

The risks posed by M-44s have resulted in strong opposition to these devices. In 2019, the Environmental Protection Agency received more than 22,000 responses to an interim decision on the reregistration of sodium cyanide; only ten of those responses supported the renewed use of M-44s.⁷ An agreement from an applicable property owner, State, or local municipality is also required before Wildlife Services places M-44 devices. However, this does not always occur, as with the M-44 near Canyon's family's property.⁸

As the Department's testimony indicated, alternative, effective, and less dangerous wildlife management methods exist and can be utilized in the place of M-44 devices. We urge the Department to take swift action and ban these devices on all its public lands and remove any that remain. Thank you for your leadership in managing public lands and ensuring they are safe and accessible.

Sincerely,



Jared Huffman
Member of Congress



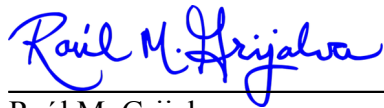
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⁵ U.S. Dep't of Agriculture, Wildlife Services, *Program Data Report G – 2020 Animals Dispersed/Killed or Euthanized/Removed or Destroyed/Freed*.


⁶ Eric Gese, *Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation*, Wildlife Damage Management Conferences – Proceedings, Paper 131 (2005) (online at http://digitalcommons.unl.edu/icwdm_wdmconfproc/131); Robert Crabtree and Jennifer Sheldon, *Coyotes and Canid Coexistence in Yellowstone, in Carnivores in Ecosystems: The Yellowstone Experience* (T. Clark et al., eds, 1999); J. M. Goodrich and S. W. Buskirk, *Control of Abundant Native Vertebrates for Conservation of Endangered Species*, 9 *Conservation Biology* (1995); Elizabeth Kierepka, et al., *Effect of Compensatory Immigration on the Genetic Structure of Coyotes*, 81 *J. Wildlife Mgmt* 1394, 1394 (2017) (online at https://www.srs.fs.usda.gov/pubs/ja/2018/ja_2018_kilgo_002.pdf); Dr. Robert L. Crabtree, "Response to 'What effect does reduction of coyotes (older than 6 months) have on the remaining population?'"', Yellowstone Ecological Research Center (June 21, 2012) (online at http://www.predatordefense.org/docs/coyotes_letter_Dr_Crabtree_06-21-12.pdf)

⁷ U.S. Environmental Protection Agency, *Sodium Cyanide Interim Registration Review Decision Case Number 8002, Docket Number EPA-HQ-OPP-2010-0751* (June 2019) (online at www.regulations.gov/document/EPA-HQ-OPP-2010-0752-0204).

⁸ *The secretive government agency planting 'cyanide bombs' across the US*, *The Guardian* (June 26, 2020) (online at www.theguardian.com/environment/2020/jun/26/cyanide-bombs-wildfire-services-idaho).



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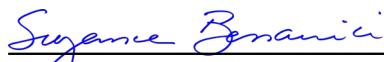
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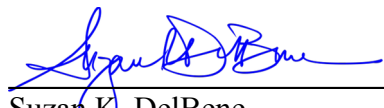
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