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Voters for Animal Rights Comment on USDA/APHIS Wildlife Services Environmental Assessment: Reducing Bird Damage in the State of New York (APHIS-2019-0070-0001)

Voters for Animal Rights (VFAR) opposes USDA Wildlife Services' proposal to kill many birds in New York including owls, kestrels, egrets, herons, plovers, hawks, osprey, woodpeckers, and many more species. Alternative 1 of this Environmental Assessment is an unacceptable course of action for reducing any damage or perceived harm these animals may cause.

VFAR takes issue with Wildlife Services' stated need for action. Wildlife Services claims that "[s]ome species of wildlife have adapted to and have thrived in human-altered habitats. Those species, in particular, are often responsible for the majority of conflicts between humans and wildlife that lead to requests for assistance to reduce damage to resources and to reduce threats to human safety." In fact, it is clear that human beings are responsible for the majority of conflicts between humans and wildlife, and that we have a responsibility to mitigate those problems responsibly and humanely. Birds not only "add an aesthetic component to the environment" but are an integral part of our ecosystem, and according to Cornell's Lab of Ornithology, more than 1 in 4 birds native birds over the last 50 years have disappeared (for some species the population loss is actually greater).

Wildlife Services' decision model is flawed, as it provides no opportunity for public input in USDA's damage assessment or wildlife management decision making, nor does it require that non-lethal management and alternative strategies be exhausted before pursuing lethal management. Wildlife belong to all New Yorkers, not just complaining landowners. Wildlife Services' documented history of cruelty to wildlife, within and outside New York, render its continued administration of lethal wildlife management an unacceptable option.

Therefore, Voters for Animal Rights submits this comment in strong opposition to Alternative 1, Continuing the Current Integrated Approach to Managing Bird Damage.

Voters for Animal Rights supports Alternative 3, "No Bird Damage Management Conducted by Wildlife Services." While we oppose Alternative 2 on the basis that we oppose USDA Wildlife Services' involvement in any wildlife management activities, whether lethal or non-lethal, Alternative 2 "Bird Damage Management by Wildlife Services using only Nonlethal Management Methods" is preferable to Alternative 1.

At a time when wildlife is so imperiled and threatened by climate change and human activity, we should do everything we can to protect and preserve these animals, not design new plans and promote new reasons and ways to kill them.