Dr. Randy Ridenour  
Supervisory Animal Care Specialist  
Western Region, Animal Care  
U.S. Department of Agriculture  
Animal and Plant Health Inspection Service  
2150 Centre Avenue, Building B, MS #3W11  
Ft. Collins, Colorado 80526

Customer #: 1215  
Registration #: 96-F-0001

Dear Dr. Ridenour:

Thank you for your letter of 30 March 2005 requesting clarification for three specific entries: Dall sheep, *Ovis dalli* (n=36); wolf, *Canis lupus* (n=1) and coyote, *Canis latrans* (n=1). I agree with your conclusion that these data as presented in APHIS form 7023A and the Section entitled “Table E EXPLANATION” are not consistent.

After missing your phone call this morning, I called Dr. V. Wensley Koch, Regional Animal Care Specialist, USDA-Western Region, to discuss the best approach to categorize field methods employed by the Fish and Wildlife Service. All animals referenced in the first paragraph should be categorized under Column E. Specific explanations are provided below.

*Ovis dalli* (Dall sheep). The 36 individuals that were captured via the use of helicopters and net guns experienced distress during pursuit, capture and handling. Pursuit via a helicopter averaged less than one minute and never exceeded 2 minutes. Times between captures (via a net gun) and nasal administration of Xyzaline were less than 2 minutes. Thus, the total time an individual incurred distress from pursuit, capture and handling was less than 4 minutes. Total handling time was less than 20 minutes. Animals were administered Naltrexone as a reversal agent. In summary, sheep incurred distress from < 1 minute to 4 minutes; consequently, all individuals should be listed under Column E.

*Canis lupus* (wolf). Research-grade, padded leg-hold traps were not monitored continuously. Traps were checked once or twice within a 24 hour period. Because the individual captured was not in the trap only momentarily, it did incur distress for a period of several hours before immobilization. Therefore, the individual should be listed under Column E.
Dr. Randy Ridenour

*Canis latrans* (coyote). Research-grade, padded leg-hold traps were not monitored continuously. Traps were checked once or twice within a 24 hour period. Because the individual captured was not in the trap only momentarily, it incurred distress for a period of several hours before immobilization. Therefore, the individual should be listed under Column E.

I appreciate your efforts to describe the discrepancies in the report 30 November 2004. I apologize for the inconvenience the discrepancies between APHIS form 7023 and explanations provided for Column E in my original report caused your office. I was unaware that the American Veterinary Medical Association (AVMA) does not consider thoracic compression to be an acceptable means of euthanasia in small mammals. Thank you for providing the website for the AVMA as a source of information for forthcoming Animal Care and Use Committee in Region 7 (Alaska). I look forward to working with your office as we develop an ACUC by 2006.

Again, thank you for your letter requesting clarification and for your support.

Sincerely,

cc. V. Wensley Koch, DVM, USDA-APHIS, Animal Care Western Region
### ANNUAL REPORT OF RESEARCH FACILITY

**COPY FOR YOUR INFORMATION**

#### FACILITY LOCATIONS (Sites) - See Attached Listing

**REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY** (Attach additional sheets if necessary or use APHIS Form 7023A)

<table>
<thead>
<tr>
<th>Animals Covered By The Animal Welfare Regulations</th>
<th>B. Number of animal being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes</th>
<th>C. Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs</th>
<th>D. Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals for which appropriate anesthetic, analgesic, or tranquilizing drugs were used</th>
<th>E. Number of animals upon which teaching, research, surgery or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, respiration or interpretation of the teaching, research, experiments, surgery, or tests. (An explanation of the procedures producing pain or distress in these animals and the reasons such drugs were not used must be attached to this report)</th>
<th>F. TOTAL NUMBER OF ANIMALS (COLUMNS: C + D + E)</th>
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<tbody>
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<td>4. Dogs</td>
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<td>5. Cats</td>
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<td>6. Guinea Pigs</td>
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<td>7. Hamsters</td>
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<td>8. Rabbits</td>
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<td>9. Non-human Primates</td>
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<td>10. Sheep</td>
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<td>11. Pigs</td>
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<td>12. Other Farm Animals</td>
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<td>13. Other Animals</td>
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**ASSURANCE STATEMENTS**

1. Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during, and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.

2. Each principal investigator has considered alternatives to painful procedures.

3. This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and submitted to the Institutional Animal Care and Use Committee (IACUC). A summary of all such exceptions is attached to this annual report. In addition to identifying the IACUC-approved exceptions, this summary lists brief explanations of the exceptions, as well as the species and number of animals affected.

4. The attending veterinarian for this research facility has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

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**CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL**

(Chief Executive Officer or Institutional Responsible Official)

SIGN: [Signature]

DATE SIGNED: 1/30/2024

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APHIS FORM 7023 (Replaced by Form 10-63 (Oct 88), which is obsolete.)

(AUG 91)