

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT
FOR
PREDATOR DAMAGE MANAGEMENT**

**FOR THE PROTECTION OF LIVESTOCK, POULTRY, PROPERTY, NATURAL RESOURCES AND
HUMAN HEALTH AND SAFETY**

WASHINGTON WILDLIFE SERVICES PROGRAM

INTRODUCTION and PROPOSED ACTION

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (APHIS-WS) program, (formerly called Animal Damage Control (ADC)) receives requests to conduct wildlife damage management to protect livestock, poultry, property, natural resources, and human health and safety within the state of Washington. APHIS-WS prepared an Environmental Assessment (EA) to analyze the environmental impacts of continuing the program that provides assistance in response to such requests. The scope of the EA includes APHIS-WS's predator damage management (PDM) actions primarily on private lands, with some work proposed on State and municipal lands, and a potential for a limited amount of work on federal lands. This decision and Finding of No Significant Impact (FONSI) are based on the analysis in this EA, which APHIS-WS now adopts as final.

Individual actions on lands encompassed by this decision could each be categorically excluded under the APHIS Implementing Regulations for compliance with the national Environmental Policy Act (NEPA) (7 CFR 372.5(c)). However, an EA was prepared to assist agency planning and invite public participation. This decision covers APHIS-WS's plans for future actions within the lands described in the EA. The purpose of the proposed plan of action is to alleviate damage caused by predator species. The need for the program, as identified in the EA, is related to the fact that livestock, poultry, certain types of property, natural resources, and at times, public health or safety may be adversely affected by predators.

The most recently compiled data show APHIS-WS has agreements to conduct PDM on about 493,000 acres in Washington, which is about 1.2% of the area within the State. Because APHIS-WS focuses control operations during times and in areas where problems are occurring or are likely to occur, only a portion of this area is typically worked and often for only a limited time during any given year. Under the proposed action, APHIS-WS would respond to predator damage complaints and may provide assistance on new lands not under current agreement. Predator damage management would not be conducted in locations where assistance was no longer needed.

APHIS-WS is the Federal agency authorized to manage damage by predators and other wildlife. APHIS-WS's authority comes from the Animal Damage Control Act of March 2, 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c), and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988. APHIS-WS also coordinates and works according to a plan with specific monitoring and reporting requirements which was developed between itself and the Washington Department of Fish and Wildlife (WDFW). WDFW has primary responsibility to manage wildlife, including bear, cougar, coyote, furbearers, and game species in Washington. All predator damage management will be conducted in a manner consistent with all applicable Federal, State, and local regulations and policies, including the Endangered Species Act.

In consideration of potential program impacts on sensitive and protected species, APHIS-WS conducted informal consultations with both the U.S. Fish and Wildlife Service (FWS) and WDFW. Both agencies agreed with APHIS-WS's conclusion in its biological assessments that the program was unlikely to or would not adversely affect Federally or State listed threatened and endangered species. APHIS-WS agrees to reinstate consultations if program plans or scope change substantially, or if any other changes, such as new species listings might otherwise potentially affect Federal or State listed threatened and endangered species.

The analysis in this EA relies heavily on existing data contained in published documents, primarily the USDA-APHIS-ADC Environmental Impact Statement (ADC EIS), to which this EA is tiered. National level Master Memoranda of Understanding were signed between APHIS-WS and the U.S. Forest Service (USFS) (1993) and APHIS-WS and the Bureau of Land Management (BLM) (1995) transferring NEPA responsibilities for wildlife damage management to APHIS-WS. There is a potential that a limited amount of work would be requested on USFS and BLM lands. The EA outlines procedures that would be followed to ensure cooperation between the agencies, and conformance to provisions of the MOUs.

The EA analysis provides a comparison of five alternatives for addressing PDM in the State. The analysis and supporting documentation are available for review at the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services office at 720 O'Leary St., NW, Olympia, WA 98502. The telephone number is (360) 753-9884.

DECISION AND RATIONALE

I have carefully reviewed the EA and believe that the issues identified are best addressed by selecting Alternative 5, the Expanded Program Alternative.

Alternative 5 provides APHIS-WS the best opportunity to meet program goals for responding to requests for service and for minimizing losses while at the same time minimizing environmental impacts. Alternative 5 best allows APHIS-WS to meet its mandates and obligations and provide PDM services in Washington.

Monitoring

APHIS-WS will plan and report wildlife take to WDFW for State management purposes. Quarterly monitoring meetings are planned between the two agencies to coordinate activities and ensure that all State concerns are addressed. APHIS-WS records and compiles its program activities in a computerized system known as the Management Information System (MIS). This information is used on a statewide and national level by APHIS-WS, and in coordination with cooperating agencies, to monitor program impacts. The work plan developed between APHIS-WS and WDFW specifies monitoring and reporting requirements.

Public Involvement

The EA and this decision document were made available for public review and/or comment, and notices of availability were published in three major, general circulation newspapers in the State, exceeding minimum requirements of APHIS and the Council on Environmental Quality. Also, notices of availability and/or the predecisional EA were sent to 109 individuals and organizations that had expressed an interest in the program on either a national or local level. Most of the public comments received did not raise substantive issues requiring further analysis. The comments received on the EA are summarized with responses below. Literature not cited in the EA is listed at the end of the Decision Notice.

1. Analysis area is not site-specific. One commenter questioned whether preparing an EA for an area as large as the State of Washington would meet the NEPA requirements for site specificity, and that either an EIS or several smaller regional EAs should be prepared because of geographic diversity of the APHIS-WS program. In fact, a determination was made through this EA that the proposed action would have a significant environmental impact, then an EIS would be prepared. In terms of considering cumulative impacts, one EA covering the entire analysis area may provide a better analysis than multiple EA's covering smaller zones within the analysis area.

APHIS-WS decided to prepare one statewide EA to cover the PDM in the State of Washington, because the program is relatively limited in scope, and the potential impacts were expected to be minor. An alternative could have been to categorically exclude smaller segments. As stated in the EA, APHIS NEPA implementing procedures allow for individual wildlife damage management actions of the kind described in the EA to be categorically excluded from the requirement for preparation of either an EIS or an EA (7CFR 372.5(c), 60 Fed Reg. 6,000-6,003, 1995). Nevertheless, this EA was prepared to assist agency planning and decision making, to inform the public, and consider impacts on the human environment from the proposed program. The EA has performed its function under NEPA (Section 1508.9(a)) of providing sufficient evidence and analysis to determine whether to prepare an EIS for NEPA compliance and of identifying better alternatives and mitigation measures.

APHIS NEPA regulations (7 CFR 372) require an EIS for actions characterized by their broad scope often "*global or nationwide*" (emphasis added). The scope of the Washington APHIS-WS program is neither global nor nationwide. Further, the proposed action does not have an impact on unique characteristics of the areas such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas, and it will not significantly adversely affect public health and safety. The effects on the quality of the human environment are not highly controversial. Although there is opposition to predator damage management, this action is not controversial in relation to size, nature, or effects. Mitigation measures adopted as part of the proposed action minimize risk to the public, prevent adverse effects on the human environment, and reduce uncertainty and risks. The APHIS-WS program, from these findings along with the issues analyzed in the EA, has determined that an EIS is not required and that preparation of an EA for the State program complies with NEPA, the Council on Environmental Quality (CEQ) NEPA implementing regulations (40 CFR 1500), and with APHIS NEPA implementing regulations (7 CFR 372).

2. The EA fails to provide current or sufficient information on livestock inventories and losses . The predecisional EA contained information from a survey completed in 1989 by the Washington Agricultural Statistics Service (WASS) which was the most recent, locally conducted study. The EA also provided information on total statewide values of sheep and cattle in Washington. In 1996, the total inventory of sheep and cattle in Washington was 60,000 and 1.29 million, respectively (WASS 1995-1996). The National Agricultural Statistics Service (NASS) recently provided information on losses caused by predators as compiled from nationwide surveys of livestock producers. A summary of that information follows: NASS (1995) reported that coyotes accounted for the loss of 575 sheep and 800 lambs in the State of Washington in 1994. Overall, predator species accounted for lamb losses valued at \$34,000, and sheep losses valued at \$58,500 in 1994. The total value of sheep and lambs lost to predators in 1994 was \$92,500. NASS (1996) reported that in 1995, 200 head of cattle valued at \$149,000 and 1,000 calves valued at \$275,000 were lost to predators. The total value of cattle and calves lost to predators was \$424,000. Although these totals are smaller than those reported in the 1989 WASS report, predation on livestock continues to pose a sizeable problem in the state of Washington. In responding to this problem, APHIS-WS provides wildlife damage management on a request-for-service basis and provides case-specific assistance where damage occurs.

One commenter requested that detailed analysis of reported and confirmed livestock killed by predators be included in the EA. Some of these data exist where APHIS-WS has had PDM programs in place and has compiled loss data reported by service recipients and confirmed by APHIS-WS specialists. However, the PDM program has been very limited in scope due to funding issues, and the number of losses actually reported to APHIS-WS has not been a realistic measure of overall losses statewide. CEQ NEPA Implementing Regulations require that an EA only "include brief discussions of need", and extensive evaluation of reported and confirmed losses is not necessary to demonstrate that predators kill livestock. APHIS-WS provides assistance where losses have occurred or are occurring and funding is available to conduct a program. The *need* on any given area where PDM is to be conducted is established before the work commences and while a program is in place.

Regardless of loss data available, APHIS-WS is charged by law to protect agricultural resources by the Animal Damage Control Act of 1931 (46 Stat. 1486; 7 U.S.C. 426-426c), and the Rural Development, Agriculture and Related Agencies Appropriations Act of 1988. In order to fulfill these directives, wildlife damage management is conducted to prevent or minimize damage and protect resources while complying with strict measures to ensure public safety as well as the protection of domestic animals, and nontarget and T&E species.

3. Comments on Humaneness. One commenter felt that "humaneness" should involve protecting livestock rather than killing the predator. APHIS-WS agrees that protecting livestock through good management, husbandry, and nonlethal control methods is preferable to removing predators. These methods are an important part of the APHIS-WS program, are recommended through technical assistance, and are implemented by the producer and APHIS-WS. Whether technical assistance, nonlethal, or lethal control is used, it is determined through a procedural process (the ADC Decision model) where the wildlife specialists in the field assess the many variables that play out in each different depredation case. Oftentimes, lethal control is used as a last resort to other methods. Lethal control is only used when an experienced, trained professional determines that it is necessary to stop or prevent losses, and it is usually combined with

producer-implemented livestock protection and husbandry.

One commenter felt that foothold traps and neck snares were inhumane and observed that the ADC Decision Model does not specifically include the humaneness of control devices as a selection criterion. The ADC Decision Model is a simplified illustration of a decision-making process which APHIS-WS personnel use to determine management strategies to apply to specific damage problems. As described in the EA, consideration is given to a variety of factors including potential biological, physical, and social impacts. Humaneness is an important consideration and is inherent in deciding which management practice or tool to use and how these tools should be used. APHIS-WS has improved the selectivity of management devices through research and development of pan tension devices, break-away snares, tranquilizing drugs, and chemical immobilization and euthanasia procedures that reduce pain. APHIS-WS strives to improve selectivity and humaneness of management devices and continues to incorporate advances into program activities. The ADC EIS examines the issue of humaneness in greater detail (Ch. 4: 131-133).

4. The EA fails to support that decreased hunting resulting from Initiative 655 will result in an increase in bear and cougar conflicts. State wildlife officials have made these projections and are qualified to do so. Other states which passed similar restrictions on hunting have experienced increases in conflicts with both species. So far in 1997, WDFW has noted a trend of increasing complaints with cougar and bear problems as compared to the same time frame in 1996. It is important to note that APHIS-WS only responds to requests for assistance. Therefore, the amount of conflict and the resulting requests for assistance would determine the need for action.

5. The EA fails to discuss the benefits of wildlife: aesthetic benefits of wildlife, role of predators in ecosystems, predator prey balance (especially impacts on rodents and the potential of hantavirus). As stated on page 1 of the EA, APHIS-WS acknowledges the positive social and aesthetic values that wildlife has for people. Wildlife is managed as a renewable natural resource. Management efforts may be directed toward preservation of species, maintenance of populations, or control of excess nuisance species (USDA 1994). The EA shows that APHIS-WS would not have a significant impact on any species, regardless of management classification. Therefore, it does not significantly impact recreational opportunities for viewing or otherwise appreciating wildlife. Additionally, APHIS-WS proposes only the potential for a very limited amount of work on Federal lands; no work is proposed on National Park lands. Most predators are removed from private property where livestock operators are experiencing or have experienced livestock losses. This further reduces the potential for impacting the recreationalist.

Wildlife management is based on estimations of wildlife populations. The many successes of modern wildlife management are reflective that such estimates are conducive to responsible wildlife management. The estimates from WDFW used in this analysis are the best available data and indicate that predator populations are stable or increasing in Washington.

APHIS-WS operates in accordance with international, Federal and State laws and regulations enacted to ensure species viability. Any reduction of a local population or group would be temporary, because migration from adjacent areas or reproduction would soon replace the animals removed. The impacts of the current APHIS-WS program on biodiversity are not significant nationwide, statewide, or locally (USDA 1994, Chapter 4.). The APHIS-WS take is a small proportion of total predator populations, and to ensure the biological soundness of its management decisions, APHIS-WS coordinates predator removal with WDFW.

The relationship between predators and rodent populations (predator/prey relationship) has been summarized in USDI (1979). Rodent populations normally fluctuate substantially in multi-year cycles. There are two basic schools of thought as to the factors responsible for these fluctuations. One is that rodent populations are self-regulated through behavior, changes in reproductive capacity due to stress, or genetic changes (Chitty 1967, Myers and Krebs 1983). The other is that populations are regulated by environmental factors such as food and predation (Pitelka 1957, Fuller 1969). Keith (1974) concluded that: 1) during cyclic declines in prey populations, predation has a depressive effect and as a result, the prey populations may decline further and be held for some time at relatively low densities, 2) prey populations may escape this low point when predator populations decrease in response to the reduced food base, and 3) since rabbit and rodent populations increase at a faster rate than predator populations, factors other than predation must initiate the decline in populations.

Wagner and Stoddart (1972) and Clark (1972) independently studied the relationship between coyote populations and black-tailed jackrabbit (*Lepus californicus*) populations in northern Utah and southern Idaho. Both concluded that coyote populations seemed to respond to an abundance of jackrabbits, but with a 1-2 year delay, suggesting that the prey population controlled the predator population, rather than the reverse. In two studies conducted in south Texas (Beasom 1974, and Guthery and Beasom 1977), intensive short-term predator removal was employed to test the response of game species to reduced coyote abundance. At the same time, rodent and lagomorph species were monitored. A marked reduction in coyote numbers apparently did not affect the populations of rabbits or rodents in either study. Similarly, Neff et al. (1985) noted that reducing coyote populations on their study area in Arizona to protect antelope fawns did not affect the rodent or rabbit population. At the relatively low levels of predator removal proposed in this EA, it is unlikely that rodent populations would increase in response to predator removal. It is also unlikely that the removal of predators by APHIS-WS would increase the spread of hantavirus.

6. The EA did not provide evidence that lethal control of wildlife is effective in reducing economic losses. Assessing avoided losses is difficult, if not impossible, because of the logic of trying to account for an event that did not occur. Little data exists for losses prevented by wildlife damage control activities. However, studies referenced in the Economic Impact Assessment in Chapter 4 of the programmatic EIS (USDA 1994) indicate that wildlife damage control methods such as those provided by the APHIS-WS program can be effective in reducing or avoiding wildlife damage in local areas. These conclusions are supported by the GAO's finding that according to available research, localized lethal controls have served their purpose in reducing such predator damage (GAO 1990). The analysis in Chapter 4 of the EIS gives more insight into avoided losses.

7. The EA fails to adequately describe the locations of the proposed action. As discussed in the EA under section 1.2, Purpose and Scope, the analysis covers all lands that are or could come under APHIS-WS agreement for predator control in Washington. Counties with active agreements are listed. The locations for future agreements cannot be predicted for a variety of reasons, but primarily because it is impossible to predict exactly where conflicts will occur. Responses to requests from people experiencing ongoing or perceived wildlife conflicts would occur as they arose. These are most likely to be in rural areas where livestock are raised or where other agricultural interests may be affected. Requests for assistance are also received from urban or suburban areas where predators impact human safety or where they prey on pets, domestic fowl, or other animals. APHIS-WS applies its Decision Model (Section 2.1 in the EA and Chapter

2 in the USDA EIS (1994)) as the site specific tool for analysis. Mitigation measures and standard operating procedures have been built into the program so that the potential for negative environmental impact is minimized.

8. Public involvement was not sufficient. APHIS-WS solicited public comments on the predecisional draft by posting legal notices in three broad circulation newspapers to ensure coverage for the entire state. In addition, APHIS-WS mailed notices directly to 109 groups and individuals that either expressed an interest in the program or were thought to have an interest.

9. Taxpayers should not subsidize wildlife damage management. One respondent felt that wildlife damage management should not be provided at the expense of the taxpayer, because "subsidies" create disincentive for change (e.g., improvements and adaptations). This concern is outside the scope of analysis for this EA. Wildlife is a public resource, and the public shares a responsibility for its management. APHIS-WS was established by Congress as the agency responsible for providing wildlife damage management to the people of the United States. In addition, State and local officials have decided that APHIS-WS should conduct PDM, and have decided to appropriate funds.

10. Individuals can responsibly handle their own wildlife conflicts. Wildlife damage management is an appropriate sphere of activity for government programs, since wildlife management is a government responsibility. In addition, some form of livestock protection would most likely be conducted by some other entity. A Federal predation management program would not only provide a service to livestock producers and others in need, but conduct an environmentally and biologically sound program in the public's best interest.

Ignorance of laws and regulations protecting wildlife and governing use of control methods may result in affected individuals using methods that are illegal or environmentally harmful. Professional assistance is sought and demanded by the public. Responsible wildlife damage management provides a balance between human and wildlife needs and serves to reduce the frustration of individuals adversely affected by wildlife. It promotes tolerance toward wildlife in general and reduces the potential for environmentally unacceptable control actions (USDA 1994).

11. The description of Alternatives was not weighted equally (there was too much focus on the Current Program alternative). The No Action alternative is a procedural requirement of NEPA. It means "no change" from the current management direction or current program. It is used as a baseline for comparison with the "action" alternatives. Therefore, it is more lengthy in description. The other alternatives were compared to the no action alternative, and their differences were discussed.

12. APHIS-WS should recommend the use of shepherds. APHIS-WS recommends using shepherds where appropriate. It is a widely employed technique, particularly for range sheep producers. See the discussion on management methods in Appendix 2 of the EA.

13. How are trapped animals killed? Does APHIS-WS train dogs to enter coyote dens and kill pups? Target animals caught in traps are euthanized, usually by shooting. Dogs are sometimes used to assist field personnel in calling and shooting coyotes and in locating dens. Pups in dens are euthanized with an EPA registered fumigant. See the label for Large Gas Cartridge in Appendix 5 and the discussion on denning in Appendix 2.

14. How does coyote control affect coyote demographics and predation on livestock? Studies (Connolly et al. 1976, Gese and Grothe 1995) investigated the predatory behavior and social hierarchy of coyotes, and determined that the more dominant (alpha) animals were the ones that initiated and killed most of the prey. Connolly et al. (1976) concluded from pen studies, with known-aged coyotes, that the proclivity of individuals that attacked livestock seemed related to their age and relationship with conspecifics. The coyotes that attacked sheep most frequently were the dominant 2-year-old males and females paired with these males, with the males being responsible for the majority of the attacks and kills. Gese and Grothe (1995) concluded from observing wild coyotes that the dominant pair was involved in the vast majority of predation attempts. The alpha male was the main aggressor in all successful kills, even when other pack members were present. Removal of local territorial (dominant) coyotes removes the individuals that are most likely to kill livestock and generally results in the immigration of subdominant coyotes that are less likely to kill livestock.

15. One commenter suggested that predators select the most vulnerable of livestock (sickly or injured) which would die of other causes anyway if not preyed upon. While it is true that predators select vulnerable prey, even healthy domestic livestock are inherently vulnerable and are frequently killed by predators. Sick, injured, or otherwise weakened animals are either medically treated or culled by most livestock managers.

16. One commenter noted that there has been a notable increase in reports of property damage and livestock loss in the last year due to predators. APHIS-WS plans to respond to requests for assistance.

17. One commenter criticized the U.S. Fish and Wildlife Service (FWS) for requesting a 1-month coyote control project on a wildlife refuge for the protection of a federally endangered species of deer. APHIS-WS included the small number of coyotes removed from the refuge in its analysis of cumulative impacts. However, wildlife management on Federal refuges, including the preservation of T&E species, is the responsibility of the FWS and is outside the scope of this EA.

18. One commenter requested more information on how new funding provided to APHIS-WS by the State legislature would be used to benefit the public. The funding will allow APHIS-WS to respond to instances of livestock depredation at no added expense, in most cases, to the service recipient. At the request of WDFW, APHIS-WS may also, at times, assist the Department in responding to threats to public safety.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Impacts on target species populations
- Effects on nontarget species populations, including threatened and endangered species
- Impacts on public safety
- Humaneness of control techniques
- Effectiveness of the APHIS-WS program

Alternatives Evaluated in the EA

Alternative 1. Continuation of the current Washington PDM program in the State (No Action). The No Action Alternative was analyzed and used as a baseline for comparing the effects of the other Alternatives as required by 40 CFR 1502.14(d). Alternative 1 allowed APHIS-WS to utilize an integrated approach in resolving predation problems. However, program funding was not sufficient for APHIS-WS to respond to existing depredation problems and would not allow APHIS-WS to respond to additional requests that are anticipated as a result of the passage of State Initiative 655. (Initiative 655, as described in the EA, is expected to greatly reduce the annual cougar and black bear harvest by Washington hunters. As a result, cougar and bear conflicts are expected to increase, and APHIS-WS is likely to receive more requests for assistance). The analysis of impacts showed that Alternative 1 would have low magnitude impacts on target and nontarget species, threatened and endangered species, risks to public safety, and humaneness. The effectiveness of the program under this alternative is determined to be less effective than the Expanded Program since APHIS-WS would not be available to respond to increased requests for assistance. Cumulative impacts were determined to be low.

Alternative 2. The Technical Assistance Alternative would allow APHIS-WS to provide only technical assistance or advice on the use of lethal and nonlethal control methods. APHIS-WS would most likely be involved in providing training and recommendations to people without experience or knowledge in wildlife management or in the resolution of wildlife problems. Therefore, the environmental impacts of these actions cannot be fully assessed or monitored. Negative impacts were likely to be greater on target and nontarget species and public safety. This alternative would likely be less humane and much less effective than either the Current or Expanded Program Alternatives.

Alternative 3. The Nonlethal Before Lethal Alternative would provide that lethal techniques would only be used after nonlethal controls had failed to control livestock losses. The environmental analysis showed that impacts on the issues considered were very similar to the Current Program, except that this alternative would be less humane to livestock and domestic animals, because it would be less effective than the Current Program. When appropriate, this alternative is often the approach preferred and used by APHIS-WS. However, the effectiveness of the program is jeopardized when APHIS-WS's ability to quickly address wildlife problems is hampered by inflexible, pre-prescribed methodologies. Among the many variables that must be considered in each damage situation are biological issues, economics, demographics, physical location and geographic area, the particular resources threatened, humaneness, and legal issues. The field technician can best resolve a problem by assessing these factors and using the Decision model to determine the most appropriate solution. Alternative 3 does not always allow for this process.

Alternative 4. No Federal APHIS-WS Program - This alternative would terminate the Federal predator damage management program in the State. This alternative was not selected because it would not allow APHIS-WS to meet its statutory responsibility for providing assistance, nor would it optimize the chances for minimizing losses. Negative impacts on target species, nontarget and sensitive species, public safety, and humaneness could be anticipated to be greater than with the Current Program. Cumulative impacts can be expected to increase without a program that provides national oversight, Federal accountability, and professional expertise.

Alternative 5. The Expanded Program Alternative would increase the Current Program efforts in the State. This alternative is contingent on the continued availability of funding. Analysis of this alternative shows that projected environmental impacts for most issues would be similar to the Current Program. However, effectiveness of the Expanded Program would be greater. Increased funding would allow for better response to existing problems than under the Current Program. It would also allow APHIS-WS to respond to additional requests for assistance which are anticipated as a result of State Initiative 655. The impacts of this alternative would be similar to those of the Current Program because of the checks and balances built into both alternatives: compliance with applicable regulatory and procedural guidelines; following standard program mitigation measures; and coordination and monitoring with both State and Federal wildlife and regulatory agencies.

FINDING OF NO SIGNIFICANT IMPACT

The EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment because of this proposed action and that these actions do not constitute a major Federal action. I agree with this conclusion and, therefore, determine that an Environmental Impact Statement will not be prepared. This determination is based on the following factors:

1. Predator damage management, as conducted in the State is not regional or national in scope.
2. Based on the analysis documented in the EA, the impacts of the PDM program will not significantly affect the human environment.
3. The proposed action will not have an impact on unique characteristics of the areas such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas.
4. The proposed action will not significantly affect public health and safety.
5. The effects on the quality of the human environment are not highly controversial. Although there is opposition to predator damage management, this action is not controversial in relation to size, nature, or effects.
6. Mitigation measures built into the program as standard operating procedures and adopted and/or described as part of the proposed action minimize risks to the public, minimize adverse effects on the human environment, and reduce uncertainty and risks.
7. The proposed action does not establish a precedent for any future action with significant effects.
8. The number of animals taken by APHIS-WS is small and when added to the total known take of all species falls well within allowable harvest levels. The amount of land area on which PDM services are conducted is also minor. Adverse effects on wildlife or wildlife habitats would be minimal.
9. No significant cumulative effects were identified by this assessment for this or other anticipated actions to be implemented or planned within the area.

Decision and FONSI - Washington Predator Damage Management

10. Predator damage management would not affect cultural or historic resources. APHIS-WS predator damage management activities are not undertakings that could have detrimental impacts on districts, sites, highways, structures or objects listed in or eligible for listing in the National Register of Historic Places, nor will they cause a loss or destruction of significant scientific, cultural, or historical resources, including interference with American Indian cultural resources.

11. An evaluation of the proposed action and its effects on T&E species determined that the program would not likely adversely affect such species. The proposed action will comply with the Endangered Species Act of 1973, as amended. Consultations with the U.S. Fish and Wildlife Service and the Washington Department of Fish and Wildlife have taken place and mitigations developed as part of that process, or mitigations that may be established as the result of further consultations, will be implemented to avoid jeopardy or significant adverse impacts.

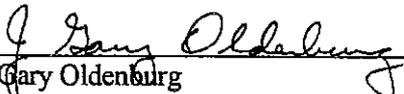
12. This action would be in compliance with Federal, State and local laws or requirements for predator damage management and environmental protection.

13. This action would be in compliance with Executive Order 12898 to insure Environmental Justice. It is not anticipated that the proposed action would result in any adverse or disproportionate environmental impacts to minority and low-income persons or populations.

DECISION

I have carefully reviewed the EA and believe the issues identified in the EA are best addressed by selecting Alternative 5. Alternative 5 provides the best range of damage management methods considered practical and effective to accomplish APHIS-WS's Congressionally authorized activities. While Alternative 5 does not require nonlethal methods to be used by producers, APHIS-WS will continue to encourage the use of practical and effective nonlethal methods by livestock producers and other service recipients. By this decision, I am directing the Washington APHIS-WS Program to implement Alternative 5, and expand the current program.

Reviewed by:



J. Gary Oldenburg
Washington State Director, USDA-APHIS-WS

10/22/97

Date

Approved by:



Michael Worthen
Regional Director, USDA-APHIS-WS

10/27/97

Date

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