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Department of
Agriculture

Marketing and
Regulatory
Programs

Animal and
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Inspection
Service

Wildlife Services

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Invitation for Public Involvement Environmental Assessment: Predator Damage Management in Idaho

You are invited by the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services Program (WS) in Idaho to participate in the planning process for the development of a new Environmental Assessment (EA) on alternatives for reducing damage to agricultural and natural resources, and property; and risks to public health and safety caused by various predators in Idaho. Predator species involved in the majority of conflicts and damage in Idaho include American crows (*Corvus brachyrhynchos*); badgers (*Taxidea taxus*); black bears (*Ursus americana*); black-billed magpies (*Pica hudsonia*); bobcats (*Lynx rufus*); common ravens (*C. corax*); coyotes (*Canis latrans*); feral, free-ranging and hybrid dogs (*C. lupus familiaris*, includes domestic dogs); mountain lions (*Puma concolor*); raccoons (*Procyon lotor*); red foxes (*Vulpes vulpes*); and striped skunks (*Mephitis mephitis*). Other predators in Idaho that have historically caused only localized damage on an occasional basis include feral/free-ranging cats (*Felis catus*), grizzly bears (*U. arctos horribilis*), mink (*Mustela vison*), long-tailed weasels (*M. frenata*), short-tailed weasels (*M. erminea*), and spotted skunks (*Spilogale putorius*). Predation from gray wolves (*C. lupus*) and fish eating birds (various species) are addressed in separate EAs and will not be included in the new EA. If you would like to participate in this process, we encourage you to read this invitation and provide information for any one or all of the following questions:

- ✓ What issues or concerns do you have regarding the USDA, APHIS, WS' involvement in Predator Damage Management (PDM) in Idaho?
- ✓ What PDM alternatives (*i.e.*, No WS PDM in Idaho, Technical assistance only, Bounty system, Only Non-lethal methods, etc.) would you suggest or propose?
- ✓ Do you have any relevant information to contribute to the analysis and this process?

Why are we conducting this analysis?

The WS program in Idaho is a cooperatively-funded, service-oriented program that provides assistance to requesting public and private entities, and federal, state, county, local and tribal governments with the management of damage and conflicts to agricultural and natural resources, and property; and risks to public health and safety caused by predators. WS authorization to provide this service was provided by Congress in the Acts of March 2, 1931 (7 U.S.C. 426-426b), as amended, and December 22, 1987 (7 U.S.C. 426c). The current program is conducted in accordance with Environmental Assessments and associated Decisions and Findings of No Significant Impact prepared for the Northern/Central, and Southern Idaho WS Districts (USDA 2002 and 1996) and their supplements. The EAs evaluate the environmental impacts of alternatives for WS involvement in PDM in Idaho. Pursuant to WS' internal National Environmental Policy Act (NEPA) review process, and after review of public comments on a draft 2014 supplement to the Southern Idaho predator EA, Idaho WS determined that preparation of a new EA to address all PDM in Idaho is warranted.

Why are we proposing this work?

The need for action is based on requests from private organizations and individuals; and federal, state and local agencies for Idaho WS assistance with protection of agricultural and natural resources, and property from damage and conflicts caused by predators; and the reduction of risks to public health and safety by managing predators.

Agricultural Resources (Livestock, crops, apiaries, etc.). According to the National Agricultural Statistics Service (NASS), livestock production (primarily cattle, sheep, hogs, and poultry), and livestock products (i.e., milk, wool) accounted for nearly \$4 billion or about 53% of total farm commodity sales cash receipts and is, therefore, considered a primary agricultural industry sector in the State. Predators are responsible for the depredation of a wide variety of livestock including cattle, goats, sheep, swine, other hoofed-stock, exotic pen-raised game, and poultry. During 2011 and 2012, predator losses accounted for 23.5% and 26.9%, respectively, of all losses to sheep and lambs in Idaho, valued around \$1.4 million and \$1.8 million, respectively (NASS 2013). Although predator losses would appear to be only a small portion of total livestock production in the state, losses are not distributed evenly among producers, and impacts on individual producers can be substantial (Baker et al. 2008). Coyotes were the leading cause of predator losses, accounting for 59% and 60% of predation caused by all predators in 2011 and 2012, respectively. Wolves were the second leading cause of predator losses, followed by domestic dogs mountain lions bears and, other predators, and unknown predators (NASS 2013).

Field crops such as melons (watermelons and cantaloupes), sweet and field corn, and wheat are susceptible to damage by predators such as coyotes; feral, free-ranging and hybrid dogs; badgers; and raccoons. Fruit and nut crops and trees can also be damaged by raccoons, common ravens and black bears in Idaho. Badger digging and burrowing causes damage to improved and planted pastures because the uneven ground hampers the use of planting and mowing equipment and can damage the equipment. Other agriculture commodities that can be damaged by predators include aquaculture; beehives; commercial game animals; livestock feed; and dikes, dams and impoundments. In Federal Fiscal Year (FY) 2011 through FY 2013 damage to these types of resources reported to or verified by Idaho WS included \$3,931 to beehives by black bears and grizzly bears; and \$1,500 damage from coyotes, common ravens, and striped skunks consuming livestock feed.

Natural Resources. Idaho WS responds to requests from agencies with natural resources management responsibilities for wildlife species that are impacted by predation. If a natural resources management agency requests assistance in protecting impacted wildlife species, Idaho WS works with the agency to identify and provide the level of assistance requested and needed. In the past, the Idaho Department of Fish and Game (IDFG) has requested Idaho WS assistance with coyote predation management for the protection of mule deer (*Odocoileus hemionus*); and striped skunk, raccoon, red fox, and coyote damage management to protect nesting waterfowl and ring-necked pheasants (*Phasianus colchicus*). In addition, the U.S. Fish and Wildlife Service (USFWS) and Idaho WS have entered into cooperative service agreements for badger, red fox, and coyote predation management for the protection of northern Idaho ground squirrels (*Spermophilus brunneus brunneus*) (a Threatened species). Greater sage-grouse (*Centrocercus urophasianus*), bighorn sheep (*Ovis canadensis*), and mule deer populations in most areas of Idaho are sufficiently healthy that IDFG allows sport harvest of these species. However, in some areas of the State, IDFG has not met management goals for these populations and could request Idaho WS to conduct PDM activities in an effort to reduce predation and/or enhance local populations of these species.

Property. Predator damage to property in Idaho includes black bears and raccoons breaking in and destroying the interiors of homes or other structures; coyotes, mountain lions, grizzly bears or red foxes killing or injuring pets and livestock guarding animals; coyotes causing damage to drip irrigation systems by biting holes in the pipe; raccoons and skunks burrowing into or under homes to den; and badgers,

skunks, or raccoons causing damage to landscaping, gardens, or golf courses from feeding activities. Over the period of FY 2011 through FY 2013, an average of 162 incidents per year of predator damage to property was reported or verified by Idaho WS with an annual average loss per year of \$4,849.

Public Health and Safety. Idaho WS conducts limited PDM activities to address public health and safety concerns. Public health and safety concerns include: attacks on humans by mountain lions, bears, and coyotes that result in injuries or death; disease threats from rabies and plague outbreaks where predators act as reservoirs for disease; and odor and noise nuisances from skunks and raccoons under houses. Idaho WS has assisted many residents in the Treasure Valley area concerned about coyote attacks on their pets and their apparent loss of fear for humans. Predator attacks on humans fortunately occur very rarely, but could result in requests for assistance.

Coyotes; red foxes; badgers; feral, free-ranging, and hybrid dogs; and feral/free-ranging cats sometimes create human safety threats when they spend time on or near airport runways. Although there has been only 1 incident of these species actually being struck by departing or landing aircraft in Idaho, such incidents have occurred at airports in other States. WS has responded to a number of requests from airports in Idaho where the presence of small predators and domestic animals on the runway was considered a potential public safety hazard. Additionally, the digging activity of badgers near or adjacent to taxiways and runways will sometimes deposit soil, rocks, and other debris on the aircraft movement areas, creating a hazard of these items being ingested into jet engines and potentially causing damage.

Questions to be addressed in the proposed EA

Based on agency relationships, Memoranda of Understanding (MOUs) and legislative mandates, Idaho WS is the lead agency for this project. Idaho WS will use an interdisciplinary approach in compliance with the National Environmental Policy Act and agency mandates, policies and regulations to address the following questions in the proposed EA:

- How can Idaho WS best respond to requests to reduce damage and conflicts to agricultural and natural resources, property; and risks to public health and safety associated with predators in Idaho?
- What are the environmental impacts of implementing various management strategies?
- Does the proposed action have significant environmental impacts, thereby triggering the need to prepare an Environmental Impact Statement?

The Lead Agency's proposed action

At this time, Idaho WS believes that the preferred alternative would be to continue and expand the current Integrated Wildlife Damage Management (IWDM) program in Idaho. Idaho WS would continue ongoing programs for the protection of agriculture, property, and human health and safety but would increase involvement in protection of threatened and endangered species, sensitive wildlife, and game species. The IWDM strategy would encompass the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, Idaho WS could provide technical assistance and direct operational assistance including non-lethal and lethal management methods, as described in the WS Decision Model (Slate et al. 1992). Predator Damage Management would be implemented in Idaho under the proposed action when requested on private, public, federal, state, or tribal lands where signed *Work Initiation Documents*, MOUs or Annual Work Plans (AWPs) are in place. All PDM would comply with

applicable federal, tribal, state, and local laws and regulations, and current MOUs between Idaho WS and various management agencies and tribes.

Requests for the protection of game, nongame, species of special concern, and T/E species would come from the IDFG, USFWS or other natural resources agencies with having management authority for the species in question. Wildlife species for which expanded PDM activities may be initiated could include, but would not be limited to, greater sage-grouse, sharp-tailed grouse (*Tympanuchus phasianellus*), mule deer and white-tailed deer (*O. virginianus*), bighorn sheep, pronghorn antelope (*Antilocapra americana*), northern and southern Idaho ground squirrels (*S. b. endemicus*), ring-necked pheasants, wild turkeys (*Meleagris gallopavo*), and waterfowl (various species).

When appropriate, non-lethal methods would be recommended and utilized to reduce damage, including physical exclusion, cultural practices (e.g., shed lambing and use of guarding animals), habitat and behavior modification (e.g., exclusion, chemical repellents, and frightening devices), and capture and relocation. In other situations, target predators would be captured and/or removed as humanely as possible using ground and aerial shooting, trapping, snaring, M-44s, denning, gas cartridges, livestock protection collars, decoy and tracking dogs, DRC-1339, or registered euthanasia drugs. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy.

Who are the Cooperating and Consulting Agencies?

Idaho WS is the lead agency for this EA, and therefore is responsible for the scope, content, and decisions made. The IDFG is a cooperating agency in the preparation of this EA. The IDFG has the authority to manage resident wildlife, and IDFG has developed and adopted a policy in 2000 for avian and mammalian predation management (IDFG 2000). The Policy provides the IDFG direction in managing predator populations consistent with meeting management objectives for prey species populations and further states that predator populations, as with all wildlife in Idaho, will be managed to assure their future recreational, ecological, intrinsic, scientific, and educational values, and to limit conflicts with human enterprise and values. WS is also consulting with the U.S. Department of the Interior Bureau of Land Management and Fish and Wildlife Service, U.S. Forest Service, Idaho State Department of Agriculture, Idaho National Laboratory, and Idaho Department of Lands.

What are the issues of concern?

Idaho WS and our cooperating and consulting agencies have identified the following issues for consideration in the analysis. Issues are used to identify and compare alternative management strategies. These issues may be addressed in the EA:

- Effects on target predator species populations
- Effects on non-target species populations, including threatened and endangered species
- Impacts on Special Management Areas (such as Wilderness Study Areas)
- Humaneness and ethical perspectives
- Effects on recreation and aesthetics (hunting and non-consumptive uses)
- Impacts on human and pet safety
- Effectiveness in reducing damage and risks to health and safety

Proposed reasonable alternatives

Idaho WS has identified the following proposed reasonable alternatives to the preferred action that may be evaluated and analyzed in the EA. Idaho WS is requesting public comments to further delineate reasonable and appropriate alternatives that should be evaluated.

1. Continue the Current Federal PDM program. This is the current Idaho WS program and is also the “No Action” alternative as defined by the Council on Environmental Quality for ongoing programs.
2. Provide Technical Assistance Only. Idaho WS would not conduct direct PDM activities in Idaho. Instead, the entire Idaho WS program would consist of only providing technical assistance (training, consultations, loaning equipment) when requested.
3. Provide Nonlethal PDM only. Idaho WS would only use and recommend nonlethal PDM methods to resolve predator damage and conflicts.
4. No Federal PDM by Idaho WS. Under this alternative the Federal WS program would be terminated in Idaho.

How to get involved

We encourage you to become involved and participate in the planning process for the development of a new Environmental Assessment (EA) on alternatives for the reduction of damage to agricultural and natural resources, and property; and risks to public health and safety caused by predators in Idaho. If you would like to participate in this process, please answer any or all 3 questions in the first paragraph of this invitation. **All comments must be submitted in writing and received by January 14, 2015.** We will accept comments on the proposal by the following methods:

- Federal eRulemaking Portal: Go to: <http://www.regulations.gov/#!docketDetail;D=APHIS-2014-0105>
- Postal Mail/Commercial Delivery: Please send your comment to State Director, USDA, APHIS, WS, 9134 W Blackeagle Dr., Boise, ID 83709, Phone: (208) 373-1630.

We look forward to receiving your comments. Your contribution will help Idaho WS make the best possible decision on reducing damage and conflicts to agricultural and natural resources, and property; and risks to public health and safety associated with predators in Idaho.

Literature Cited

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