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## **FINDING OF NO SIGNIFICANT IMPACT FOR PREDATOR DAMAGE MANAGEMENT CONDUCTED BY WILDLIFE SERVICES IN IDAHO**

### **Introduction**

The Animal and Plant Health Inspection Service, Wildlife Services (WS) program, formerly known as the Animal Damage Control (ADC) program, prepared two separate environmental assessments (EAs) in 1996 which addressed the need to conduct predator damage management and the potential impacts of various alternatives for responding to predator damage problems in Idaho. The first of these two documents addressed predator damage management in southern Idaho (USDA 1996a), and included all lands south of the southern boundaries of Adams, Valley, Custer, and Lemhi counties. A Finding of No Significant Impact (FONSI) and Decision were issued July 22, 1996 for that document. The other EA addressed predator damage management in the remaining portion of the State (USDA 1996b), and a FONSI and Decision were issued for that document on November 4, 1996. The decision for both of those EAs was to continue conducting an integrated predator damage management program, using all legally available control methods as appropriate, plus the addition of the use of the Livestock Protection Collar (LPC) as soon as it became registered for use in the State of Idaho. Copies of these documents are available from the Wildlife Services State office in Boise.

The purpose of this document is to review information that has become available in the year since both of the above-mentioned EAs were completed, and to determine if the FONSI and Decisions made in conjunction with those documents are still appropriate. The most current information available when the EAs were prepared was data from the 1995 reporting period. This review uses the most currently available information, which in most cases is 1996 data.

### **Livestock Losses**

According to data compiled by the Idaho Agricultural Statistics Service (IASS 1997), predation was the single largest cause of death loss for Idaho sheep producers in 1996, with 35% of the total death losses attributed to predators. A total of 4,000 adult sheep and 11,800 lambs, valued at approximately \$1.6 million, were reported killed by predators. Coyotes were responsible for the most damage, at 10,700 head of sheep and lambs. Predation by domestic dogs, black bears, mountain lions, red fox, and gray wolves accounted for most of the other predator losses. Based on reported sheep inventories and lamb crop, these losses represented a 4.5% predation loss on lambs, and a 1.6% loss on adult sheep. This was the loss level sustained *with an integrated damage control program in place*. Research results suggest that predation losses in the absence of a control program would average about 17% for lambs and 4.5% for adult sheep (USDA 1994).

In response to requests for assistance from livestock producers in FY 96, Wildlife Services personnel confirmed predation on 862 adult sheep, 1,501 lambs, 3 adult cattle, 155 calves, 18 goats, and 417 poultry Statewide. These losses represent only a fraction of the actual losses that likely occurred, and serve more as an indicator of what kinds of predator damage exist rather than an indication of damage magnitude.



### **Review of Environmental Impacts**

A primary issue addressed in both of the previously prepared EAs was the impact of Wildlife Services' predator removal efforts on the viability of target and nontarget wildlife populations. Coyote predation continues to be the biggest predator problem in both analysis areas, and more coyotes are taken than any other species. Based on the coyote population estimates used in the EAs and the number of coyotes taken in FY 96, Wildlife Services removed an estimated 16% of the coyote population in the southern Idaho analysis area, and an estimated 4% of the population in the northern Idaho analysis area, or an estimated 11% of the Statewide coyote population. Based on the analysis in both of the EAs, the total coyote harvest may be as much as double the number of coyotes taken by Wildlife Services. But even if the total harvest were 3-4 times the number of coyotes taken by Wildlife Services, this level of harvest would still fall well within the allowable harvest level of 70% (USDA 1994). Data on Wildlife Services' coyote take per hour of aerial hunting suggests that coyote populations were at least as high in 1996 as they were in 1995.

The FY 96 annual take of other primary target and nontarget species has also been analyzed and compared to existing population estimates and/or trend information. None of the other target or nontarget species taken by Wildlife Services sustain as high a level of harvest as do coyotes, and the take of all these species falls well within allowable harvest levels as prescribed in the EAs and USDA (1994). Nontarget animals comprised 1.5% of the total Wildlife Services take in the southern Idaho analysis area, and 3.4% of the total take in the northern Idaho analysis area during the FY 96 reporting period. Both of these figures fall within the objectives set in the EAs.

### **New Information Available Since Completion of EAs**

During preparation of the two EAs in FY 96, several commenters expressed concerns about the rationale for conducting preventive control. Under this strategy, coyotes are removed during the winter months from high mountain grazing areas through aerial hunting, in order to reduce the likelihood of predation on sheep during the following summer months. In the Decisions accompanying both of the EAs, Wildlife Services acknowledged concern about this practice, and committed to continuing cooperation in research on this subject. A graduate student from Utah State University recently completed her 4-year doctoral study on this subject (Wagner 1997), in cooperation with Wildlife Services, and the results of that study strongly support the rationale for this practice. In addition to a significant reduction in the amount of coyote predation on those allotments where aerial hunting had been employed, the amount of time and effort required to address predation problems the following summer was also significantly reduced. This reduction in the need for coyote control efforts in the summer is an advantage because some of the methods typically employed during the summer months, such as traps and snares, are less selective for target species than is aerial hunting.

### **Compliance and Monitoring**

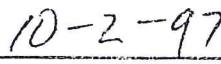
Predator damage management activities have been conducted in a manner consistent with all applicable environmental regulations, including the Endangered Species Act and the National Environmental Policy Act. APHIS Wildlife Services representatives will continue to meet at least annually with cooperating local officials from the BLM, Forest Service, Fish and Wildlife Service, and the Idaho Department of Fish and Game regarding conduct of predator damage management activities. Substantial changes in the scope of work or changes in relevant guidance documents or environmental regulations may trigger the need for further analysis.

Based on a review of information available since the completion of the two EAs in 1996, there continue to be no indications that Wildlife Services predator damage management activities might have a significant impact on the quality of the human environment. The Decisions made in conjunction with the two 1996 EAs have also been reviewed, and no new decision is deemed necessary. This determination is based on consideration of the following factors, which were previously addressed in the two EAs:

1. Predator damage management, as conducted by Wildlife Services in the two identified analysis areas, is not regional or national in scope.
2. Wildlife Services' predator damage management activities pose minimal risk to public health and safety. No injuries to any member of the public are known to have resulted from these activities in either of the analysis areas.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to predator control, the program is not highly controversial in terms of size, nature, or effect in either of the two analysis areas.
5. Based on the analysis documented in the EAs and the accompanying administrative files, the effects of the predator damage management program on the human environment would not be significant. The effects of these activities are not highly uncertain and do not involve unique or unknown risks.
6. These activities do not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through the previous EAs or through this review. The number of animals taken by Wildlife Services, when added to the total known other take of all species, falls well within allowable harvest levels.
8. None of the activities in either analysis area would affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
9. An informal Section 7 consultation with the U.S. Fish and Wildlife Service confirmed that the activities carried out under Wildlife Services predator damage management program would not likely adversely affect any threatened or endangered species.
10. All activities are carried out in compliance with all Federal, State, and local laws imposed for the protection of the environment.

For additional information or questions regarding this FONSI, please contact the Idaho Wildlife Services State office, 1828 Airport Way, Boise, ID 83705, telephone (208) 334-1440.

  
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Mark Collinge, State Director  
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