



United States  
Department of  
Agriculture

Animal and Plant  
Health Inspection  
Service

Wildlife  
Services

9134 W. Blackeagle Dr.  
Boise, ID 83709  
(208) 378-5077 Phone  
(208) 378-5349 FAX

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

### **Introduction**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS), Wildlife Services (WS) program is directed by law and authorized by Congress to protect American agriculture and other resources from damage associated with wildlife. The program's primary statutory authority is the Act of March 2, 1931, as amended in the Fiscal Year 2001 Agriculture Appropriations Bill. WS responds to a variety of requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions are categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). In order to evaluate and determine if there might be any potentially significant impacts to the human environment from WS' planned and proposed program, an environmental assessment (EA) was prepared. A pre-decisional EA was released by WS in February, 2002, which documented the need for predator damage management in southern Idaho and assessed potential impacts of various alternatives for responding to predator damage problems. WS' proposed action was to expand the current program's activities by becoming involved in additional efforts to protect wildlife, specifically sage grouse, the recently listed northern Idaho ground squirrel, and the southern Idaho ground squirrel.

### **Background**

In 1996, the WS program prepared a similar EA on Predator Damage Management in Southern Idaho to evaluate the potential effects of the program at that time and to address the proposed use of the Livestock Protection Collar (LPC) as an additional control tool. That process involved extensive solicitation of public input regarding issues to be addressed and alternatives to be considered, followed by preparation and release of a pre-decisional EA. Following a 30-day public comment period, all public comments were addressed in conjunction with preparation of a Finding of No Significant Impact (FONSI), and a Decision was issued to incorporate the use of the LPC into the existing predator damage management program.

In 2001 WS began preparation of a new EA to address the proposed expansion of the current predator damage management program in southern Idaho to include additional activities for the protection of sage grouse and the northern and southern Idaho ground squirrel. In preparing this EA, WS considered all of the issues identified during preparation of the 1996 EA as well as all additional issues identified by the public and cooperating agencies since that time. A draft EA was prepared and circulated to representatives from cooperating agencies, including the five National Forests and two BLM Districts lying wholly or partially within the southern Idaho analysis area, the U.S. Fish and Wildlife Service (FWS), the Idaho Department of Fish and Game (IDFG), the Idaho State Department of Agriculture, and the Idaho Department of Lands. After receiving input from cooperating agencies, a pre-decisional EA was released. Availability of the EA was announced through publication of legal notices in the Idaho Statesman, the Times News, the Idaho State Journal, and the Post Register for 3 consecutive days. Additionally, copies of the EA and an invitation to provide comments were mailed to approximately 100 individuals and organizations who had previously expressed an interest in the WS program. A 30-day public comment period was provided for public input on the pre-decisional EA; the public comment period ended on March 20, 2002.

## **Major Issues**

Major issues identified by cooperating agencies and the public included:

1. Cumulative impacts on viability of wildlife populations.
2. Effectiveness and selectivity of wildlife damage management methods.
3. Risks posed by damage management methods to the public and domestic pets.
4. Potential effects to threatened and endangered (T/E) species.
5. Cost effectiveness of predator damage management activities.
6. Potential environmental impacts associated with aerial hunting activities.

## **Alternatives Analyzed in Detail**

Six alternatives, ranging from an expanded version of the current program to no program at all, were analyzed in relation to the primary issues identified above. Four additional alternatives were considered but not analyzed in detail. A detailed discussion of the anticipated effects of the various alternatives as they related to the issues was provided in Chapter 4 of the EA. The following summary provides a brief description of each alternative and its anticipated impacts.

**Alternative 1. Continuation of the Current Program (No Action Alternative).** Consideration of the No Action alternative is required under 40 CFR 1502.14(d), and provides a baseline for comparing the potential effects of all the other alternatives. This alternative consists of using all currently authorized chemical and mechanical control methods in an integrated approach to resolve a wide variety of predator damage problems in the analysis area. Control actions may be initiated under either a corrective or a preventive strategy, in response to current or historic livestock losses, or in response to wildlife agency requests for assistance. Alternative 1 results in only low levels of impact on wildlife populations, presents very low risks to the public and T/E species, and is cost-effective. Currently used methods are effective and selective.

**Alternative 2. Expanded Wildlife Protection Activities (Proposed Action).** This alternative would involve the use of all the same control methods as used in Alternative 1, but would also provide for WS involvement in additional activities to protect the threatened northern Idaho ground squirrel, the southern Idaho ground squirrel, and sage grouse, as requested by the responsible wildlife management agency. The FWS has requested WS' assistance to protect dwindling populations of the northern Idaho ground squirrel from predation by badgers and other predators, and may request WS' assistance to protect the southern Idaho ground squirrel in the foreseeable future. The IDFG has requested WS' assistance in conducting the predator removal portion of a proposed research project to assess the potential benefits of predator control on sage grouse nesting success and chick survival. No additional tools or methods would be used in these efforts beyond those used in the current program. Cumulative impacts to targeted predator populations could be slightly higher under this alternative, but would still be of a low magnitude overall. Risks to the public and to T/E species would be low, and cost-effectiveness would be expected to similar to Alternative 1.

**Alternative 3. No Preventive Control.** This alternative would limit predator damage management activities to only those situations where predation on livestock or wildlife was presently occurring. It would not allow for implementing preventive control activities in areas of historic losses prior to the time when livestock once again returned to an area of historic livestock losses. WS would be unable to respond to some requests for assistance from livestock producers and the IDFG. All of the same control tools available under Alternatives 1 and 2 would be available under Alternative 3, but would only be used after current losses were verified by WS employees. Cumulative impacts on targeted predator populations, selectivity of methods, and risks to the public or T/E species would be similar to Alternatives 1 and 2, but predation losses would likely be higher and cost-effectiveness would be lower.

**Alternative 4. No Use of Chemical Control Methods.** This alternative would limit predator damage management activities to the use of only mechanical control methods such as foothold traps, snares, and aerial hunting. Some of the most selective control methods, such as the Livestock Protection Collar and the M-44 device, would not be available for use. The bird toxicant DRC-1339 is the most practical, selective and effective method for reducing numbers of ravens, but this method would not be available under Alternative 2. It would therefore be difficult if not impossible to effect the desired level of temporary raven population reduction for the IDFG's proposed sage grouse/predator control study. Cumulative impacts on wildlife populations would be low, but selectivity of available control methods and effectiveness would be lower than under a fully integrated control program. Risks to the public, pets and T/E species from M-44 use are ordinarily low, but would be nonexistent under this alternative.

**Alternative 5. Technical Assistance Program.** Under this alternative, WS would not provide any operational damage management assistance to persons or agencies experiencing predator damage problems, but would instead provide only advice, recommendations, and limited technical supplies and equipment. Predator damage management would likely be conducted by persons with limited experience and training, and with little oversight or supervision. Risks to the public and to T/E species would probably be greater than under Alternatives 1-4, and effectiveness and selectivity would probably be lower. Cumulative impacts on wildlife populations would be low.

**Alternative 6. No Federal Predator Damage Management Program.** This alternative would terminate the Federal WS program in the analysis area. The impacts of this alternative would be very similar to the impacts of Alternative 5 since neither of these alternatives involve any operational control activities carried out by the WS program. This alternative would not allow the WS program to comply with its statutory responsibilities, and risks to the public and T/E species would probably be greater than for Alternatives 1-4. Members of the public experiencing predator damage problems would need to conduct predator damage control operations themselves, or seek assistance from some other source such as IDFG or private predator control operators. Predator control would still occur, but without the oversight and accountability inherent with a Federally operated program. The lack of availability of some specialized control methods and expertise would probably result in reduced effectiveness and selectivity, and increased amounts of predator damage. Cumulative impacts on wildlife populations would be low.

#### **Comments from the Public on the Pre-decisional EA**

A total of 164 responses were received during the 30-day public comment period, most of which were brief e-mailed opinions sent in response to an "action alert" posted by an environmental organization. The following is a summary of the primary comments received and responses to those comments:

**1. WS must prepare an EIS because the analysis area is so large and because predator control activities such as killing wolves and use of poisons are so highly controversial.** As noted at Section 2.4.2 of the EA, Federal agencies have the discretion to determine the geographic scope of their NEPA analysis, and WS has determined that preparation of this EA to address predator control activities in southern Idaho is appropriate. And as noted at Section 2.4.3 of the EA, just because special interest groups may disagree with an agency's proposed action, that does not necessarily create a controversy in terms of NEPA. The term "controversial" applies to the environmental effects of the proposed action, not opposition to the proposed action itself. Prior to releasing the predecisional EA for public comment, WS solicited comments from representatives of the five National Forests and the two BLM Districts lying wholly or partly within the analysis area, as well as from representatives of the FWS, IDFG, Idaho State Department of Agriculture, and the Idaho Department of Lands. None of these consulting agencies suggested that an EIS should be prepared, nor did they disagree with WS' assessment of the effects of the proposed action. This is not unexpected, given that the Forest Service and the BLM have prepared numerous EA's in prior years on WS' activities on various National Forests and BLM Districts across the western U.S., and all of those EAs resulted in determinations that WS' predator control activities had no significant environmental impacts.

**2. Loss and degradation of habitat is one of the most important factors in the decline of sage grouse and northern Idaho ground squirrel populations, so WS should have included an alternative that focused primarily on habitat improvement to help these species' populations.** WS agrees that loss and degradation of habitat is probably one of the most important factors related to declines in a number of species' populations. But the EA prepared by WS was not meant to assess alternatives for most effectively recovering sage grouse or northern Idaho ground squirrel populations. The focus of the EA was to assess various alternatives for reducing predator damage, and the potential environmental effects of implementing those alternatives. Included in this analysis was consideration of how best to conduct the predator removal portion of a proposed study to assess the potential benefits of predator control to sage grouse nesting success and chick survival. The analysis also considered whether reducing numbers of predators in limited areas for limited periods of time (as part of the proposed action) might have a significant effect on the environment. WS did not propose this study, but was asked to assist the IDFG in conducting the predator removal portion of the study. As noted on page 2-11 and 2-12 of the EA, the effects of grazing, range fires, and noxious weeds on sage grouse habitat, and the need for studies on the relationship between habitat and sage grouse are all outside the scope of this EA. There has been no suggestion that predator control should be used instead of habitat improvement efforts to help sage grouse, and habitat improvement efforts by land management agencies and private landowners would in fact be expected to continue, regardless of whether or not the proposed action is implemented.

**3. WS needs to consult with the U.S. Fish and Wildlife Service regarding potential impacts of the proposed action on threatened and endangered species in the analysis area.** As noted at Sections 4.4.1 and 4.4.2 of the EA, WS has previously entered into formal and informal Section 7 consultation with the FWS regarding the potential impacts of the current program on listed species, and WS also entered into Section 7 consultation with the FWS regarding the potential impacts of the proposed action. The FWS issued a Biological Opinion and letter of concurrence on March 28, 2002, in which they determined that WS' proposed predator control activities are not likely to jeopardize the continued existence of the Canada lynx, gray wolf, or whooping crane in the southern Idaho analysis area. The FWS also concurred with WS' assessment that the proposed activities were not likely to adversely affect any other listed species.

**4. WS needs to consider a broader range of alternatives to the proposed action, including an alternative which would require livestock producers to first demonstrate implementation of nonlethal preventive methods or other management practices to reduce the likelihood of predation.** Six potential alternatives, ranging from an expanded version of the current program to no program at all, were analyzed in detail in the EA. Four additional alternatives were considered, but not analyzed at the same level of detail as the other six alternatives. As noted on pages 3-11 and 3-12 of the EA, the alternatives selected for detailed analysis in the EA included many elements of a "nonlethal emphasis" alternative suggested by the Humane Society of the United States. WS could choose to implement an alternative which incorporates components of two or more of the alternatives analyzed in the EA. Elements of one alternative could be combined with selected elements of one or more other alternatives to create the strategies used in implementing the program. As discussed on page 3-4 and in Table 3.1 of the EA, under the current program and the proposed action WS would continue to encourage the use of nonlethal methods such as guard dogs, scare devices, llamas, and other methods which may become available, whenever appropriate. As a practical matter, the current program is in most instances a program which involves not applying lethal control measures until nonlethal measures have been tried and found to be ineffective. As an example, a recent survey of WS cooperators conducted by the National Agricultural Statistics Service (NASS 1999) found that 92% of the sheep producers who requested WS assistance were already employing nonlethal preventive control measures. Although there is no law or policy requiring livestock producers to employ good husbandry practices to protect their stock, most producers do employ a variety of husbandry practices and nonlethal preventive measures to protect their stock as a matter of good business.

**5. The 2002 EA and the 1994 EIS upon which the EA is tiered both fail to take into account the increase in human population and the accompanying increase in recreational use of public lands. Part of the WS Decision Model process (discussed on pages 3-3 and 3-4 of the EA) includes consideration of biological, physical, economic and social impacts at the local level. This is true regardless of the level of recreational use by the public in areas where WS may be conducting activities. As an example, in areas where recreational use is expected, WS may choose to limit control actions to calling and shooting or aerial hunting, and avoid setting equipment which might interfere with public use of an area. WS confers at least annually with public land management agencies to help ensure that WS activities are being conducted consistent with multiple use objectives on public lands.**

**6. There is insufficient justification to conduct the proposed sage grouse/predator control study, since the literature review cited on page 1-7 of the EA (Cote and Sutherland 1996) concluded that predator control did not consistently result in increased breeding populations of birds in the year following predator control. As noted on page 1-7 of the EA, Cote and Sutherland (1996) reviewed and analyzed the results of 20 published studies where predator removal had been undertaken to assess its effects on bird populations. Their analysis suggested that removing predators consistently had a large, positive effect on hatching success and significantly increased autumn densities of the target bird species. But their analysis also suggested that predator removal did not consistently result in increased breeding populations in the year following predator control. Part of their rationale for why they thought this was happening was that juvenile birds typically experience a high rate of overwinter mortality which would prevent most of this increased production from contributing to the breeding population. However, a review of relevant data from southern Idaho would not support this hypothesis in the case of sage grouse. Average survival rates for juvenile (10-week to 1-year old) sage grouse in a recent southern Idaho study were around 80% (Connelly et al. 2000), which is much higher than the survival rate for juveniles of most bird species looked at in Cote and Sutherland's (1996) paper. The authors also suggested, as pointed out in the discussion on page 1-7 of the EA, that predator control may in fact increase breeding bird populations, but this effect may go undetected if the increased breeding population migrates out of the study area into nearby areas where population monitoring may not be occurring.**

**7. WS needs to consider the phenomena of "mesopredator release" as it relates to the proposed sage grouse/predator control study. Specifically, by removing coyotes, populations of red foxes, which may be more likely to prey on sage grouse than coyotes are, could increase and actually exacerbate predation on sage grouse or other bird species of concern. While the phenomena of mesopredator release has been documented in the absence of larger predators, this phenomena would not likely result from WS' limited predator damage control efforts, particularly in the case of proposed sage grouse/predator control study. The temporary nature of predator removal for the proposed study (no more than 15 weeks of predator removal effort each year) would make it virtually impossible to remove all predators, even if that were the goal, which it is not. As noted on page 4-12 of the EA, predation management efforts would not be conducted in the treatment areas with the goal of eliminating all predators, but rather to temporarily reduce their numbers to a point where they would be unlikely to have a detrimental impact during the relatively brief, but critical period of sage grouse nest and chick vulnerability. Predators from surrounding areas would be expected to begin reinfiltrating the treatment areas within a few weeks to several months after termination of control efforts each year. Also, under the proposed study design, red fox populations in the treatment areas would not be expected to increase regardless of whether the phenomena of mesopredator release was applicable or not, since red fox would be targeted at the same time as coyotes in the treatment areas.**

Although research conducted in the prairie potholes region of the upper midwest and Canada has suggested that the presence of coyotes may prevent red fox from occupying the same habitat, it is not clear that those conclusions are as applicable here in southern Idaho. This may be because much of the habitat in southern Idaho offers more opportunity for red fox to escape from or avoid coyotes, as compared to the grasslands of the prairie potholes region. Gese et al. (1996) found that red foxes avoided coyotes in Yellowstone National

Park, but coexisted in the same habitats. It is common to catch both red fox and coyotes in the same trap sets in southern Idaho, a phenomena also reported by Voigt and Earle (1983) in Ontario farm land habitats. This evidence suggests that coyotes do not necessarily exclude red fox from an area.

**8. The proposed sage grouse/predator control study and the proposed action for protection of northern and southern Idaho ground squirrels need to include monitoring which would provide data on whether or not predator control is effective in achieving management objectives.** The IDFG study plan for the proposed sage grouse/predator control study includes provisions for extensive monitoring to assess sage grouse nest success, survival rates for adults and chicks, and population trends for target predators and prey species. As noted on page 3-10 of the EA, monitoring of sage grouse and predator populations by IDFG is not subject to NEPA analysis and was therefore not specifically discussed in the EA, but it is definitely part of the proposed study. As noted at Section 4.5.2 of the EA, an assessment of actual costs and estimated benefits would be included as part of the monitoring efforts associated with both the sage grouse/predator control study and any ground squirrel protection efforts.

**9. It is inappropriate to control predators to increase populations of nonnative species such as pheasants, or to increase populations of any species just so hunters can shoot them.** As noted on page 2-4 of the February, 2002 EA, this issue was considered in the 1996 EA. This is a social value judgement outside the scope of this EA. The jurisdiction for managing most resident wildlife rests with the IDFG, and IDFG may request WS' assistance in achieving their management objectives. Part of IDFG's role in managing wildlife is to promote healthy populations of game species for harvest by hunters.

**10. The economic analysis in the EA is flawed and failed to consider relevant costs such as lost recreation dollars and ecological costs of removal of top-level predators.** As noted at Section 4.5 of the EA, NEPA does not require preparation of a specific benefit-cost analysis, and consideration of this issue is not essential to making a reasoned choice among the alternatives being considered. However, as noted at Section 4.5.1 of the EA, a recent review by the U.S. General Accounting Office (GAO 2001) concluded that all of the available, credible analyses on the cost-effectiveness of WS wildlife damage management activities have suggested that benefits exceed costs.

**11. The EA failed to adequately assess cumulative impacts on target species populations. WS needs to consider mortality associated with State and private predator control efforts. The population estimates and population trend information used in assessing cumulative impacts is not credible.** WS believes that the EA incorporated the best information available on the various predator species' populations and/or population trends. As noted on page 4-1 of the EA, when population estimates were used to make a quantitative determination of the cumulative impacts on a species population, conservative population estimates were used to ensure that cumulative impacts were adequately addressed. In addition to using the best information available to estimate population size and/or trend, the EA incorporated the best information available on harvest level from all sources. The analysis in Chapter 4 of the EA did consider the predator mortalities associated with private aerial hunting efforts and IDFG-sponsored private predator control efforts at State Wildlife Management Areas in southern Idaho, as well as all known and estimated take by sport hunters and trappers. This information was considered along with the best information available on sustainable harvest levels in order to arrive at a determination of the magnitude of cumulative impact. The EA was reviewed by multiple State and Federal cooperating agencies, and none of these agencies disagreed with any of the cumulative impacts assessments in the EA.

**12. Control methods used by WS are not selective for offending animals. Lethal predator control measures are ineffective in reducing livestock losses.** Effectiveness and selectivity of predator damage management methods was one of the primary issues addressed in detail in the EA. Effectiveness and selectivity of individual control methods was discussed on pages 3-5 through 3-8, and on pages 4-13 and 4-14 of the EA. As noted at Section 4.2.1 and in Table 4.1 in the EA, several of the methods employed by WS are typically 100% selective for the target species, and other, less selective methods such as traps and snares

are still highly selective as used by WS employees (i.e., 93% - 96% selectivity with traps and snares as used by WS employees). Few methods are available which are 100% selective for offending individuals, the notable exceptions being the Livestock Protection Collar and shooting an animal in the act of depredation. In spite of these limitations, the effectiveness of lethal predator damage control in reducing livestock losses has been well documented. As noted on page 3-3 of the EA, an investigation by the U.S. General Accounting Office (GAO 1990) concluded that according to available research, the use of localized lethal control methods has been demonstrated as effective in reducing predator damage.

**13. WS relied on selective use of science and flawed science to justify its activities, and failed to consider the best available science in development of the EA.** The EA considered relevant information from nearly 300 references, most of which were from peer-reviewed scientific journals, proceedings from professional meetings, and reports from State Fish and Game Departments. One of the primary purposes for the "Purpose and Need" section in Chapter 1 of the EA is to provide evidence of need for the proposed action, and WS did incorporate information which demonstrated the need for the proposed action. WS has considered alternative interpretations of some of the relevant science as suggested by several commenters (see examples in responses 6 and 7 above), but no new evidence or interpretations have been provided which would change the analysis in the EA.

**14. It is inappropriate to use results of rancher surveys (as provided in Table 1.2 in the EA) as an indicator of livestock losses to predators.** The EA should indicate what proportion of livestock losses are actually verified by WS employees. As indicated on page 1-4 of the EA, the issue of "Appropriateness of using rancher-supplied data to quantify livestock losses" was addressed in the 1996 EA and that information was incorporated by reference into 2002 EA. As noted in the 1996 EA, Pearson (1986) reported on several studies that indicated little or no bias occurred in ranchers reporting loss, and Shelton and Klindt (1974) found that some ranchers underestimated their losses due to some husbandry practices. Schaefer et al. (1981) investigated sheep predation and determined that: 1) producers correctly assessed the cause of livestock death more than 94% of the time, and 2) the results of two types of loss surveys yielded similar results. As noted on page 1-5 of the EA, average losses attributed to predation by Idaho sheep producers between 1998 and 2000 amounted to about 33% of the total reported death loss. However, through intensive monitoring conducted during a study on 3 typical range sheep operations in southern Idaho, Nass (1977) found that predation was actually responsible for 56% of the total death losses. This data suggests that attributing an average of 33% of total death losses to predation is not unrealistic, and may even suggest that Idaho sheep producers could be *underestimating* their predation losses." As indicated in the bottom row of data in Table 1.2 and in the text on page 1-6 of the EA, WS confirmed between 5-10% of the total reported sheep and lamb losses during the 1998-2000 reporting period.

**15. The 2002 EA and the 1994 EIS both fail to take into account the risk that terrorist groups or anti-government isolationists might divert dangerous toxicants for nefarious purposes.** The 1080 Livestock Protection Collar and the sodium cyanide capsules used with the M-44 device are registered for use in Idaho only by WS employees, and EPA-required safeguards on storage and use of these products greatly reduce any likelihood of misuse. These products are typically used in very small quantities in remote rural areas, which further reduces the likelihood they might be the targets of theft or tampering by individuals interested in misusing these products.

**16. Federal land management agencies are responsible for NEPA compliance for activities conducted on Federal lands.** As noted on page 2-4 of the EA, this issue was addressed in the 1996 EA. Under the terms of a 1995 Memorandum of Understanding (MOU) between APHIS-WS and the BLM and a 1998 MOU between APHIS-WS and the U.S. Forest Service, APHIS-WS is recognized as the agency with the authority and the expertise to conduct wildlife damage management. Under these agreements, the BLM, Forest Service and WS all recognize that WS is responsible for NEPA compliance related to any wildlife damage management conducted by WS on lands administered by the Forest Service and BLM. The Forest Services and the BLM cooperate with WS in the preparation of NEPA documents addressing WS activities on lands administered by these two agencies.

## **Finding of No Significant Impact**

The analysis in the EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:

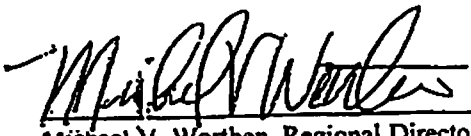
1. Predator damage management, as conducted by WS in the southern Idaho analysis area, is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety. No injuries to any member of the public are known to have resulted from WS activities in the analysis area.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas which 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 expected environmental effects associated with implementing the proposed action are not controversial among experts.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed predator damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks. Current WS predator damage management activities have been occurring for decades in the analysis area with no significant adverse environmental impacts.
6. The proposed action would not establish a precedent for any foreseeable future action with significant effects.
7. No significant cumulative effects were identified through this assessment. The number of animals taken by WS, when added to the total known other take of all species, falls well within allowable harvest levels.
8. The proposed activities would not 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. The U.S. Fish and Wildlife Service has concurred, through formal and informal Section 7 consultation, that WS' current and proposed action is not likely to jeopardize the continued existence of the Canada lynx, the gray wolf, or the whooping crane, nor is it likely to adversely affect any other listed species in the analysis area.
10. The proposed action would be in compliance with all Federal, State, and local laws imposed for the protection of the environment.
11. Predator removal efforts associated with the proposed sage grouse/predator control study would be conducted only in limited areas and for a relatively brief period of time during each year of the study. Predators from surrounding areas would be expected move into the treatment areas within a few weeks to several months, and local populations would be expected to return to pretreatment levels within one to two years or sooner.



## Decision

I have carefully reviewed the EA and the input provided during the public involvement process. I believe implementation of Alternative 2, the Proposed Action, will provide the best overall compromise in addressing the issues identified in the EA while also providing for a predator damage management program which will best meet the needs of cooperating agencies, organizations and individuals who may request WS' assistance. Implementation of Alternative 2 will involve the use of no additional control methods beyond what are being used in the current program, but will allow for WS to assist the IDFG in a proposed research project to assess the potential benefits of predator control on sage grouse nest success and chick survival. It will also allow for WS to cooperate with other Federal and State agencies in their efforts to promote recovery of northern and southern Idaho ground squirrel populations by protecting these species from predation.

For additional information regarding this decision, please contact Mark Collinge, APHIS Wildlife Services, 9134 W. Blackeagle Drive, Boise, ID 83709, telephone (208) 378-5077.

  
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Michael V. Worthen, Regional Director  
APHIS-WS Western Region

4-16-02  
Date

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