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Bureau of Land Management**

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**November 2014
Predator Hunt Derby**

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CHAPTER 1- INTRODUCTION

Background

While hunting has always been allowed on public lands, hunting and fishing derbies on public lands are increasing in popularity. Age old hunting traditions of competing for the biggest fish or wild game, has transitioned from informal wagers between family and friends to sanctioned competitive events. Typically in the past, these events have occurred on private lands and private hunting clubs, but as the popularity of the contest grow, public land managers are seeing more interest from the public to host these types of events on public lands and waters. The Bureau of Land Management has a procedure for accommodating such requests through the special recreation permit (SRP) administration process. SRPs are authorizations which allow specified recreational uses of public lands and related waters. SRPs allow the BLM to manage visitor use, protect natural and cultural resources, and achieve the goals and objectives of the field office recreation program as outlined in applicable land use plans. SRPs also serve as the mechanism to authorize six different types of recreational uses. Based on policy outlined in the BLM's Recreation Permit Administration Handbook H-2930-1, fishing and hunting derbies fall under the competitive use category. Competitive use means any organized, sanctioned, or structured use, event or activity on public land in which two or more contestants compete and either of the following elements apply:

1. Participants register, enter or complete an application for the event; or
2. A predetermined course or area is designated.

During the first week of December of 2013, the BLM Salmon Field Office received a request from Idaho for Wildlife to hold a predator hunt derby on private, state, U.S. Forest Service and BLM-managed lands within the Salmon area. This event was scheduled to take place the last week of December 2013. Given the short time frame between the request and the event, the BLM was given to process the permit, the BLM denied the applicant the opportunity for a permit. The BLM advised Idaho for Wildlife that it would not be able to process the application before the last week in December. The BLM recommended to Idaho for Wildlife to submit an application 6 months in advance for any events they would like considered in subsequent years. Consequently, the derby was held on private, state and U.S. Forest Service managed lands. Participants were advised that animals harvested from BLM-managed lands would not be eligible for prizes.

In accordance with BLM's advice, in June 2014, Idaho for Wildlife submitted an application for a second predator derby to be held January 2nd through 4th, 2015. This Environmental Assessment (EA) is an analysis of the potential environmental impacts that could result from implementing the application received by Idaho for Wildlife to host a predator hunt derby on BLM managed public lands as described in the proposed action. The EA assists the BLM in project planning, ensures compliance with the National Environmental Policy Act (NEPA), and provides the analysis for making a determination of significance based on the consideration of context and intensity of the impacts.

As stated in the BLM Manual 6521 State Agencies::

“...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal

species...”

In relation to wildlife this EA focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game.

Purpose and Need for Action

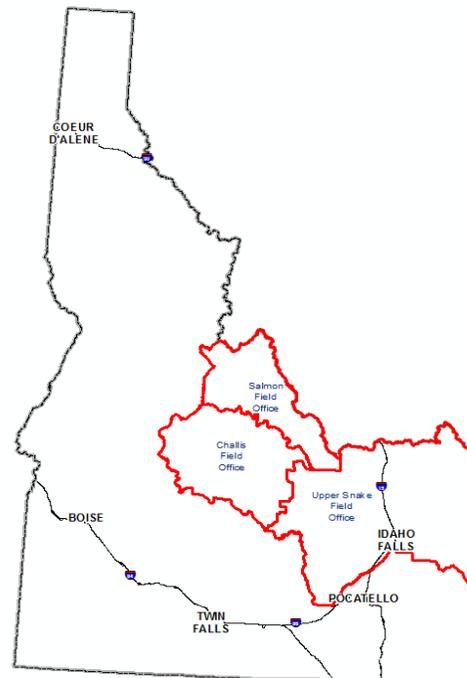
The BLM’s purpose is to respond to an application submitted by Idaho for Wildlife to host a competitive event on public lands administered by the Idaho Falls District Office. The BLM needs to consider the proposed action as the agency is responsible, under the Federal Land Management and Policy Act (FLPMA), to manage public lands for multiple uses in a manner which recognizes the nation’s need for recreation opportunities on public land.

Location

The area of analysis includes approximately 3,100,000 acres of BLM-managed public lands located within the Challis, Salmon and Upper Snake Field Offices of the Idaho Falls District. These lands encompass Lemhi, Fremont, Jefferson, Teton, Madison, Bingham, Bonneville, Power, Custer, Butte and Blaine Counties. The majority of the use would occur on lands surrounding the communities of Salmon, Leadore, Challis, North Fork and Gibbonsville, all located in Lemhi and Custer Counties (See Appendix A).

Conformance with the Applicable Land Use Plan

The area potentially affected by the proposed action is governed by six land use plans: the Lemhi Resource Management Plan, as amended (April 1987); the Challis Resource Management Plan, as amended (July 1999); the Medicine Lodge Resource Management Plan (April 1985); the Little Lost/Birch Creek Management Plan (1981); the Big Desert Management Framework Plan (1981); and the Big Lost Management Framework Plan (1982).



The proposed action is consistent with the Lemhi Resource Management Plan because a variety of recreational opportunities are specifically provided for in the following Land Use Plan decision:

Recreation Opportunities (Pg. 44): “A broad range of outdoor recreation opportunities will continue to be provided for all segments of the public, depending on demand.”

The proposed action is in accordance with the Challis Resource Management Plan, which provides:

Recreation Opportunities and Visitor Use, Goal 3 (page 55): Provide recreation opportunities for the remainder of the resource area not included in a [Special Recreation Management Area], including areas specifically for unstructured outdoor experiences, trails, (e.g., hiking, horseback riding, bicycling), recreational mineral collection, and OHV use.

While not specifically provided for in the Medicine Lodge Resource Management Plan the issuance of SRPs for competitive events is consistent with the following plan objectives, terms, and conditions and, if applicable, implementation plan decision:

Management Area 4 Scatted Tracts (page 11-12): Continue to manage the area for dispersed recreation activities.”

The proposed action is in conformance with the Little Lost/Birch Creek Management Framework Plan (1981), which provides:

Recreation management objective #5 (page 11): “Maintain or enhance the present quality of recreation activities/opportunities such as hunting, fishing, and wildlife viewing in the planning unit.”

The Big Desert and Big Lost Management Framework Plans do not specifically address SRP applications, but the documents provide general guidelines for recreation on public lands.
Relationship to Statutes, Regulations or Other Plans

The proposed action is authorized by or consistent with the following laws, and treaties:

- The Federal Land Policy and Management Act of 1976 (43 U.S.C §§1701-1782, October 21, 1976, as amended)
- The National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321-4347, January 1, 1970, as amended)
- The Endangered Species Act of 1973, as amended. (16 U.S.C. 1531-1544, 87 Stat. 884), as amended
- The Migratory Bird Treaty Act of 1918, as amended. (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended
- The 1868 Fort Bridger Treaty, between the United States and the Shoshone and Bannock Tribes, reserves the Tribes right to hunt, fish, gather, and exercise other traditional uses and practices on unoccupied federal lands. In addition to these rights, the Shoshone Bannock have the right to graze tribal livestock and cut timber for tribal use on those lands of the original Fort Hall Reservation that were ceded to the federal government under the Agreement of February 5, 1898, ratified by the Act of June 6, 1900.

Scoping, Issues, and Decision to be Made

Scoping

In response to the application received in June 2014, the BLM created an inter-disciplinary team (IDT), comprised of recreation, forestry, wilderness, wildlife, range, fisheries, weeds, archaeology, and lands to consider and discuss the potential impacts of the proposed event. A smaller IDT was created to further analyze these impacts as discussed in detail in Chapter 2.

On August 4, 2014, the BLM initiated a 15-day public scoping period. A scoping letter and a Notice of Proposed Action in Wilderness Study Area (WSA) was released prior to August 4, 2014, to inform interested publics of the proposed action. Approximately 56,500 comments were received during the scoping period. Roughly 56,490 commentors indicated opposition to the event; most of these letters were copies of nine different form letters that expressed general disapproval of a hunting derby wherever it is held. Approximately 500 unique/personalized comments were received.

Scoping Comments

Many individuals and organizations showed interest in the proposal through input received during the scoping process. Some of these comments were received from local and regional members of the public, but the majority of the comments were from national and international members of the public who received email alerts regarding the project from organizations such as Western Watersheds Project, Care2.org, Center for Biological Diversity, Wild Earth Guardians, MoveOn.org, the Coyote Project and Defenders of Wildlife. Almost all of the opposition comments include statements about disrupting the natural balance of the ecosystem and the nature of the event being unethical. A few of the commentors supporting the event referenced the hunting heritage of Idaho, multiple uses of public lands, and predator control as a means to manage big game populations. All of the commentors who provided specific responses indicated that public lands managed by the BLM are important to them or their supporters because they value these resources for wildlife, recreation, education, scenic qualities, wilderness, and leaving a healthy legacy for future generations.

Issues

The following issues were identified through internal and external scoping and are further analyzed in the environmental assessment:

1. How does the proposed event impact economic and social values?
2. How does the proposed project impact existing recreational uses or contribute to user created conflicts?
3. How will the proposed action affect wildlife habitat and threatened species in the project area?
4. How does the proposed action impact Tribal and Treaty Rights?; and
5. Does the proposed project meet the non-impairment standard for actions within a Wilderness Study Area (WSA) and does the proposed action impact the WSAs future designation as Wilderness?

Decision to be Made

Based on the NEPA analysis, the authorized officer will approve the application and issue a SRP, approve the the application and issue a SRP subject to terms and conditions, or deny the application.

CHAPTER 2 –ALTERNATIVES

Alternative A (Applicant’s Proposed Action)

Predator Hunt Derby Application for a Special Recreation Permit

The proposed action is for the BLM to issue a 5 year special recreation permit (SRP) to Idaho for Wildlife. This would allow an annual predator hunt derby on public lands managed by the Challis, Salmon, and Upper Snake Field Offices of the Idaho Falls District, totaling approximately 3,100,000 acres. For the purposes of the competition, predators include a variety of species, including, wolves, coyotes, weasels, skunks, jackrabbits, raccoons, and starlings. Harvests of gray wolves within Idaho are regulated by the Idaho Department of Fish and Game (IDFG). All rules and hunting regulations associated with a purchased wolf tag can be found at <http://fishandgame.idaho.gov/public/docs/rules/bgWolf.pdf>. The other species are un-regulated and therefore there is no limit on the number of animals harvested. Predatory wildlife may be taken in any number year-round and at any time by holders of the appropriate valid Idaho hunting or trapping licenses, provided such taking is not in violation of state, county or city laws, ordinances, rules or regulations.

Registration for the event would occur online or in person at a private business in Salmon, Idaho, and would be open for up to 500 participants. Because there is the opportunity for online registration, some competitors could hunt from distant locations on private or National Forest administered lands. However, the majority of the competitors would register in person and hunt within a short drive of Salmon, Idaho. Registered participants then harvest as many predators as they can within 3 days following the check-in. There would be no trapping for any species allowed as part of this event. Participants bring their harvested predators to a location on private property within Salmon, where they would compete on a point system based on the number and types of predators harvested. Legal predators as classified by Idaho Fish and Game that may be harvested as part of this event includes coyotes, skunks, weasels, jackrabbits, raccoons and starlings. Idaho Fish and Game manages the populations of these species listed as predatory wildlife and they have established that these species may be taken in any number, year-round, and at any time by holders of the appropriate valid Idaho hunting or trapping licenses, provided such taking is not in violation of state, county or city laws, ordinances, rules or regulations. The Gray Wolf, which is listed as a big game predator is also an acceptable targeted predator species as part of this event and the applicant would work closely with Idaho Fish and Game to ensure that the bag limit quota is not exceeded.

The applicant would be permitted to host a competitive event on public lands, and as such participants would have to comply with all regulations associated with public lands, including travel designations, game retrieval laws, and shooting restrictions (i.e. campgrounds, buildings). In addition, the design features/stipulations identified as part of the proposed event include:

- All Idaho Fish and Game hunting rules would apply.
- This event could occur between December 15 and January 15, and would be valid for 5 years after a successful initial 1-year probation period given the applicant completed the annual permit maintenance required and followed all applicable laws, regulations, and stipulations.
- 3 consecutive days of competitive use of public lands within the permit area would be

authorized under this permit.

- The anticipated use is between 250 to 300 registered competitors, however, the permit would allow for up to 500 competitors to accommodate growth in subsequent years.
- The applicant must provide information to the competitors regarding regulations associated with the public lands which would include travel designations, game retrieval laws, and shooting restrictions in addition to providing information regarding state hunting laws.
- In the event that any of the WSAs located within the action area are designated as wilderness, the permit would be amended to exclude the wilderness areas.
- The applicant would notify the Salmon Field Office of the intended derby dates 6 weeks in advance in subsequent years.
- Hunters would be required to disclose the location of where they harvested their animals entered into the contest during the nightly check-in.
- All vehicles and equipment used as a part of the event must be washed clean of mud and debris to reduce the spread of weed seed.

Monitoring:

Random monitoring would occur to ensure the permittee is implementing the stipulations and design features identified. A BLM representative would be present at the pre-meet and registration to ensure that the applicable rules and regulations are clearly communicated to the contestants.

Alternative B (No Action)

The BLM would not approve the SRP application submitted by Idaho for Wildlife. The recreation opportunities would remain as present within BLM administered lands in the Idaho Falls District. The event would likely still occur on private, state, and National Forest administered lands within the region.

CHAPTER 3 - AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section provides a description of the general environmental setting and resources within that setting that could be affected by the proposed action and alternative(s). In addition, the section presents an analysis of the direct, indirect, and cumulative environmental impacts likely to result from the implementation of the various alternatives.

General Setting:

The proposed action is located across a broad landscape encompassing varied terrain, generally characterized by wide open rolling sagebrush valleys with panoramic, steep forested mountains. Most of this area is very rural, and ranching has played an important role in the development of these lands. The impacts of ranching very visible today with fences, livestock developments, and roads scattered amongst the valley bottoms and rolling bench terrain. Roads are visible throughout the action area and most were pioneered for historical logging, mining, and ranching activities. However, today, most use is related to recreation and ranching activities. Because the area is so immense both elevation and precipitation vary, but valley bottoms typically average around 3,000 ft. above sea level and the high ridges of the Beaverhead and Salmon River

Mountains extend as high as 8,000 ft. above seal level Annual average precipitation for the action area varies from 14 to 21 inches. Snow cover across the landscape is likely between the months of November and March, with only a couple of inches present in the valley bottoms to several feet of snow being common in higher elevations. Land ownership across the landscape is a mosaic of private, federal, and state administered lands.

View from South of Lemhi Pass, located in the Action Area



Resources Considered in the Impact Analysis:

The following items (Table 1) have been evaluated for the potential for impacts to occur, either directly, indirectly, or cumulatively, due to implementation of the proposed action.

Table 1. Resources Considered in the Impact Analysis.

Resource	Resource Status	Rationale
Access	Present, Not Affected	There are many existing access roads located on both private and public lands in the project area. The alternatives would not result in changes in access to the area.
Air Quality	Present, Not Affected	The implementation of the alternatives would not result in the production of vehicle or equipment emission or particulate matter above incidental levels.
Areas of Critical Environmental Concern (ACECs)	Present, Not Affected	There are 12 ACECs located in the project area. Rules and regulations, such as obeying travel management objectives and designations would prevent any measurable impact to the desired management objectives of the ACECs.
Cultural Resource	Present, Not Affected	The alternatives would cause no measurable impact to the cultural resources present in the action area because the intensity of hunter presence would likely not exceed that occurring during a typical non-derby hunting season. Rules and regulations, such as obeying travel management objectives and designations would avoid disturbances to known cultural resources.

Resource	Resource Status	Rationale
Economic and Social Values	Present, Affected	Impacts are disclosed under Environmental Consequences.
Environmental Justice	Present, Not Affected	There are some scattered minority and low-income populations in the project area however, the projects and actions described in the alternatives would not affect these populations as described under Executive Order 12898 of 2/11/1994. There would be no disproportionately high and adverse human health or environmental impacts to the minority and low-income populations in the area resulting from the proposed activities.
Existing and Potential Land Uses	Present, Not Affected	Authorized uses within the project area include rights-of-ways, Land Use Permits, grazing allotment, etc. The alternatives would not impact the current or future authorized uses occurring in the project area.
Fisheries	Present, Not Affected	The alternatives would not impact fisheries because all motorized travel would be consistent with current travel designations. Fish habitat and population would not be effected as a result of implementing the proposed action. Fish are not a targeted species for the proposed predator derby.
Floodplains	Not Present	FEMA identified floodplains are not present in the project area and would not be impacted by any of the alternatives.
Forest Resources	Present, Not Affected	The alternatives would not impact forest resources because as part of the proposed action all motorized travel would be consistent with current travel designations and does not involve the harvest of wood products.
Invasive, Non-Native Species	Present, not Affected	The alternatives would not impact invasive, non-native species because motorized travel would be consistent with current travel designations and the design features of the proposed action mitigate the spread of invasive weed seed.
Mineral Resources	Present, not Affect	The alterntaives would not impact mineral resources because the proposed action does not involve activities that would impact mineral resources.
Migratory Birds	Present	Impacts are disclosed under Environmental Consequences
Native American Religious Concerns	Present, not Affected	The alternatives would not impact ceremonial sites or resources associated with ceremonial practices in the proposed project area.
Paleontological Resources	Present, not Affected	The alternatives would cause no measurable impact to paleontological resources located in the area because motorized travel that would occur as part of the proposed action would be consistent with current travel designations.
Prime and Unique Farmlands	Not Present	There are no prime or unique farmlands located within or near the proposed project area.
Soil Resources	Present, not Affected	The alternatives would cause no measurable impact to soil resources because motorized travel that would occur as part of the proposed action would be consistent with current travel designations.
Threatened,	Present, not	The alternatives would cause no measurable impact to threatened,

Resource	Resource Status	Rationale
Endangered, and Sensitive Plants	Affected	endangered, or sensitive plants or their habitat within the proposed project area because most plants would be in a dormant stage during the time of year that is proposed for use and motorized travel that would occur would be consistent with current travel designations. Additionally, because the event would be held in January, vegetation would be snow-covered and unlikely to be affected by incidental trampling.
Threatened, Endangered, and Sensitive Animals	Present	Impacts are disclosed under Environmental Consequences
Threatened, Endangered, and Sensitive Fish	Present, not Affected	The proposed action would cause no measurable impact to threatened, endangered, or sensitive fish because motorized travel that may occur would be consistent with current travel designations.
Range Resources	Present, not Affected	The alternatives would not impact range resources because the proposed action would not be related to cattle or rangeland management public lands.
Recreational Use	Present, Affected	Impacts are disclosed under Environmental Consequences
Tribal Treaty Rights and Interests	Present	Impacts are disclosed under Environmental Consequences
Vegetation	Present, not Affected	The alternatives would cause no measurable impact to vegetation because as part of the proposed action all motorized travel would be consistent with current travel designations. Additionally, because the event would be held in January, vegetation would be dormant and snow-covered and unlikely to be affected by incidental trampling.
Visual Resources	Present, not Affected	The alternatives would not impact visual resources within the project area. The alternatives would result in no change to the character of the existing landscape.
Wastes, Hazardous and Solid	Not Present	The alternatives would cause no measurable impact to Hazardous and solid wastes.
Water Quality (Surface and Ground)	Present, not Affected	The alternative would cause no measurable impact to water quality because all motorized travel would be consistent with current travel designations.
Wetland and Riparian Zones	Present, not Affected	The alternatives would cause no measurable impact to wetlands and riparian zones because all motorized travel would be consistent with current travel designations.
Wild and Scenic Rivers	Present, not Affected	The alternatives would cause no impact to wild and scenic rivers because there would be no activities occurring in river corridors that would impact wild and scenic river values as a result of the proposed action.
Wild Horse and Burro HMA's	Present, not Affected	The alternatives would cause no impact to wild horse and burros due to the requirement for all motorized travel to be consistent with current travel designations and the dispersed nature of the hunting associated with the SRP.

Resource	Resource Status	Rationale
Wilderness/Wilderness Study Areas	Present	Impacts are disclosed under Environmental Consequences
Wildlife Resources	Present	Impacts are disclosed under Environmental Consequences
Lands with Wilderness Characteristics	Present, not Affected	The alternatives would cause no measurable impact to lands with wilderness characteristics in or near the project area because hunting does not impact lands with wilderness characteristic values.

**- Rationale for Interdisciplinary Team recommendations is required for all “not present” and “present not impacted” situations. For resources that are “present and impacted” a detailed analysis is provided.*

Wildlife, Threatened/Endangered Animals, Sensitive Animals, and Migratory Birds

Affected Environment

Wildlife habitat within the area includes Forest and Woodland, Semi-Desert Shrubland and Grassland, Mesic Shrubland and Grassland, High Montane Vegetation, and Sparse Vegetation and Natural Barren Areas.

Many wildlife species utilize these habitats. These habitats provide forage, nesting substrate, and cover for a variety of bird, mammal, amphibian and reptile species common to the area.

Although all of the species are important members of native communities and ecosystems, most are common and have wide distributions within the area, state, and region. There are also species listed under the ESA in the area, as well as BLM special status species (Table 2).

Table 2: Important habitats for Special Status Species within the Action Area by cover type

Cover Type	Mammals	Birds	Reptiles and Amphibians
Forest and Woodland	Canada lynx, gray wolf, grizzly bear, wolverine, Townsend’s big-eared bat, fisher	Flammulated owl, calliope hummingbird, Lewis’ woodpecker, Williamson’s woodpecker, olive-sided flycatcher, northern goshawk, Hammond’s flycatcher, Unita chipmunk, Virginia’s warbler	
Semi-desert Shrubland and Grassland (Sage-steppe)	Gray wolf, pygmy rabbit, Townsend’s big-eared bat, Piute ground squirrel	Greater sage-grouse, Brewer’s sparrow, prairie falcon, ferruginous hawk, Columbian sharp-tailed grouse, loggerhead shrike	
Mesic Shrubland and Grassland (Riparian)	Grizzly bear, Townsend’s big-eared bat, fisher	Yellow-billed cuckoo, bald eagle, Lewis’ woodpecker, trumpeter swan, black tern, loggerhead shrike, sage sparrow, white-faced ibis, Virginia’s warbler	Western toad, common garter snake, northern leopard frog
High Montane Vegetation	Canada lynx, gray wolf,		

Cover Type	Mammals	Birds	Reptiles and Amphibians
	grizzly bear, wolverine		
Sparse Vegetation and Natural Barren Areas	Wolverine, Townsend's big-eared bat	Peregrine falcon	

Further consideration is given to avian species afforded special management emphasis under the Migratory Bird Treaty Act (MBTA). As of 2010, under a signed Memorandum of Understanding (MOU) with the USFWS, the BLM has a responsibility to “as practical, protect, restore, and conserve habitat of migratory birds, addressing the responsibilities in Executive Order 13186”. Given the timing of the Proposed Action there would be very few migratory birds species in the area, since most would have migrated south for the winter months.

Focal Special Status Animal Species

Canada lynx: There are records of Canada lynx in the Project Area. The area crosses many LAUs. Based on the Canada Lynx Conservation Assessment and Strategy (Ruediger, 2000), public lands managed by the BLM within the area do not provide primary lynx habitat since the forest vegetation is considered a “dry site,” which lacks adequate components for species reproduction and foraging. Timbered BLM managed lands, as well as riparian corridors provide a connectivity corridor for wildlife, as they move through the area. The population of Canada lynx is low, with few, if any, sightings recorded in a given year.

Grizzly bear: A portion of the Yellowstone Primary Conservation Area (PCA) for the grizzly bear extends into the Upper Snake Field Office boundary and the Project Area, including approximately 2,000 acres of BLM managed lands. Grizzly bear occurrence has been documented within this area. Most of the area is outside of the PCA and grizzly bear habitat. Hibernation denning sites are typically located on the upper portions of slopes, not characteristic of the habitat on BLM administered lands within the PCA.

Greater sage-grouse: Recently, Idaho BLM initiated a modeling effort to identify preliminary priority sage-grouse habitat (PPH) within the Snake River Plain MZ (Makela & Major, 2012). Priority habitat includes breeding, late brood-rearing, and winter concentration areas. Because priority habitat areas have the highest conservation value for maintaining the species and its habitat, it is BLM policy (as per WO IM 2010-071) to identify these areas in collaboration with respective state wildlife agencies. Preliminary results indicate that approximately 2,340,000 acres of PPH and 1,420,000 of Priority General Habitat (PGH) are within the derby area. Much of this area is also currently identified by Idaho as “key” greater sage-grouse habitat. Key habitat consists of generally intact sagebrush that provides sage-grouse habitat during some portion of the year by the (Idaho Sage-grouse Advisory Committee, 2006).

Yellow-billed cuckoo: Suitable habitat for the yellow-billed cuckoo is described as a large block (minimum of 25 acres to upwards of 99 acres) of cottonwood canopy and a thick willow understory (USDI-FWS, 2001). This type of habitat is rare within the Project Area, but does occur along the Snake River in the Upper Snake Field Office.

Alternative 1: Proposed Action

Wildlife species would be harvested as part of the proposed action. This harvest would be subject to the IDFG rules and regulations. The animals targeted for the derby could be harvested

legally even if the event was not occurring. Comments concerning effects at the population level for the target species have been shared with the IDFG. The IDFG does not expect the species to be affected at the population scale. IDFG's management goal is for reduction, not elimination of predators. Predator control often involves removal of animals, but the intent is not to completely eliminate predators. The long-term goal is to reduce predator numbers enough to allow increased game numbers, increased harvest opportunities, and to maintain viable populations of all wildlife, including predators (IDFG, 2012).

Controversy will always surround predation management. It is complex and involves balancing diverse interests using biological and social considerations. Left unmanaged, predators and prey are likely to cause private property damage and have significant economic impacts. Unmanaged wildlife populations can also result in increased disease transmission, declines in habitat, food sources, and reduction of hunting, fishing and trapping opportunities (IDFG, 2012).

Within most of the Action Area, IDFG uses a quota system for the harvest of wolves. For 2014, a total of 125 wolves were available for harvest in Wolf Management Zones that overlap the Action Area, 47 were harvested. In the Southern Idaho Wolf Management Zone there was no quota, meaning that any number of wolves could be harvested, in that zone two wolves were harvested (IDFG and Nez Perce Tribe, 2014). The number of wolves harvested during the derby can not exceed the quotas that have been established by IDFG.

A study in Idaho (Hurley, et al., 2011) has tried to remove species like coyotes from an area to increase survivorship of prey species. However, the study concluded that coyote removal had no detectable effect on the population growth rate for mule deer in the study area. As for the population of coyotes, studies have shown that harvesting 75% of the population annually would not exterminate the population over 50 years, due to increased reproductive rates in areas where coyotes are intensively controlled (Voigt & Berg, 1987). Even under the most severe removal programs, repopulation by coyotes can be expected within months (Beasom, 1974) or 2–3 years (Connolly & Longhurst, The effects of control on coyote populations: a simulation model, 1975) (Connolly, 1978), (1995).

Skunk populations are stable to increasing statewide during the past five years (IDFG, 2012). Populations of skunks are robust as they have high recruitment rates and fluctuations in populations are generally attributed to environmental variables such as disease (Wade-Smith & Verts, 1982). Skunks are primarily a nocturnal species and often inactive during winter months. Weasels do not hibernate and are active in the winter and active during the day. Weasel populations are robust as they have high reproductive rates and fluctuations are generally attributed to environmental variables such as seasonal food availability (King, 1983). Weasel populations statewide are stable to increasing over the past five years (IDFG, 2012). Populations of jack rabbits can fluctuate rapidly but jackrabbits are a robust species with high fertility and high mortality rates. Jack rabbits are primarily a nocturnal species (Best, 1996). Raccoon populations can fluctuate rapidly and population declines are generally attributed to environmental factors such as disease (Lotze & Anderson, 1979). Raccoon populations statewide are stable to increasing over the past five years (IDFG, 2012). Raccoons do not hibernate but may become inactive during extended periods of cold weather. Raccoons are generally nocturnal. Given the population size and activity of these target species during the

winter months, it is unlikely the Proposed Action would have an affect on populations at the local or regional scale.

The European starling is an exotic invasive species. Their populations generally are thought to have a detrimental impact to the native flora and fauna of the region. Although the majority of starlings migrate prior to December there have been starlings documented in the region during the winter months.

In addition to the legal harvest of wildlife, participants in the event would displace individual animals as they move through the area. This displacement would be short lived and only over small distances. Participants in the event would follow existing travel management restrictions which protect big game, like elk and deer, from being displaced on crucial wintering areas. Because the event would occur between December and January, most migratory bird species would have moved to wintering grounds during the event and would not be affected by the event.

Focal Special Status Animal Species

Canada lynx: Given the low population of Canada lynx in the area, and that most of the hunting would occur at lower elevations, the Proposed Action would not affect the lynx.

Grizzly bear: Most of the hunting is expected to occur near Salmon, ID and other portions of the Project Area outside of the PCA and grizzly bear habitat. Additionally, the Proposed Action would occur during the hibernation period of grizzly bears within the GYA. Hibernation denning sites are typically located on the upper portions of slopes, not characteristic of the habitat on BLM administered lands within the PCA. Given that most of the human activity associated with this Proposed Action would be outside of grizzly bear habitat, and that grizzly bears would likely be hibernating at that time, it is expected that the Proposed Action would not impact the grizzly bear.

Greater sage-grouse: The IDFG has been consulted with and they agree that habitat for greater sage-grouse would be maintained with this proposal. Impacts to sage-grouse would be limited to potential flushing of birds should a hunter come into close proximity to the birds.

Yellow-billed cuckoo: Yellow-billed cuckoos are a migratory species and would not be in the area during the derby. Cuckoo habitat would not be affected by the derby. There would be no effects to cuckoos.

Alternative 2: No Action Alternative

There would be no additional impacts to wildlife or their habitat. Animals would still be harvested as part of a contest, but not on BLM managed public lands.

Economic and Social Values

Affected Environment

Economics

The action area encompasses 3.1 million acres of BLM-administered public lands with several small and large communities scattered throughout the project area. Because the majority of competitors would register in Salmon, Idaho and the final check in and post meeting would be held in Salmon, the majority of economic impacts that may result would be concentrated around

the town of Salmon; therefore, the economic analysis will focus on the town of Salmon and outlying smaller communities.

Salmon, Idaho is located in Lemhi County and the county is described as a rural area with an estimated population of 7,936. Most of the population is concentrated in and around the communities of Salmon, North Fork, Tendoy, and Leadore. Historically, the Lemhi County economy was based on mining activity which caused population and job numbers to fluctuate over time.

Early in the decade Lemhi County's unemployment rate hit 7.4 percent and gradually declined to 4.3 percent by 2007. Since then rates doubled, averaging 9.8 percent in 2012. The average annual unemployment rate for 2013 in Lemhi County was 9.0% compared to 5.6% for the State of Idaho and 7.4% for the U.S. (State of Idaho, 2014). By June 2014, the total seasonally adjusted employment of the Civilian Labor Force in Lemhi County was 3,285 with the total unemployed of 259, a rate of 7.9%.

Lemhi County's basic economic sections are services and retail (tied to tourism and ranch/farm activities), government, agriculture (ranching), mining, and construction. Government, including schools, is a basic sector of the economy in many small, rural economies like Salmon because it brings personal income and tax revenues from the state and federal levels into the community. Government employs about 37% of the county's workers, and trade, transportation, and utilities, along with leisure and hospitality, employ 27% of the labor force (State of Idaho, 2014) (State of Idaho, 2014).

Lemhi County's estimated per capita income in 2012 was \$33,884, compared to an average of \$34,481 for Idaho and \$43,735 nationally (State of Idaho, 2014). In Lemhi County, per capita income increased by \$10, 650 since 2003.

Overall, outdoor recreation in Idaho supports 37,000 jobs, generates \$154 million annually in state tax revenue, and generates \$2.2 billion annually in retail sales and services. Non-residents spend more than \$400 million per year on wildlife-related recreation in Idaho. The largest single category of non-resident wildlife-related recreation spending in Idaho is wildlife watching. Over 550,000 individual wildlife watchers spend over \$432 million per year in Idaho and make up 67% of all "sportsmen" who recreate in the state. Idaho as a state has the highest overall per capita participation in non-hunting-related recreation in the U.S. Activities in this statistic include backpacking, cycling (on- and off-road), bird watching, car camping, canoeing, climbing, fly fishing, hiking, kayaking, rafting, skiing (on- and off-resort), snowshoeing, and trail running (Suhr-Pierce, 2014).

In counties containing a large percentage of federal land, such as Lemhi County, the Federal Government contributes payments in lieu of taxes (PILT). PILT payments are Federal payments to local governments to offset losses in property taxes and compensate for the costs to support nontaxable Federal lands within their boundaries. PILT totaled more than \$7.3 million in Lemhi

County from 2004 to 2013, for an average of about \$733,000 per year. The minimum payment was \$502,309 in 2004 and the maximum payment was \$899,963 in 2012¹.

Social

Concern as to how federal lands are managed is a common theme across the west. Many groups and individuals indicate the condition of resources on public lands managed by the BLM is important to them because they value these resources for wildlife, recreation, education, scenic qualities, wilderness, open space, and a variety of other reasons. Many individuals and groups are also concerned about limitations being put on the availability of public lands managed by the BLM for recreational and commercial uses.

Recreation is a component of most lifestyles in the analysis area. The substantial recreational opportunities for fishing, hunting, hiking, horseback riding, OHV use and sightseeing are an important element of the overall quality of life for residents. Many people have either moved to or stayed in the county because of the recreation opportunities. Recreationists are very diverse groups of people and changes in recreation management can affect the people who engage in the various activities very differently. They tend to organize into interest groups; most recreational activities have at least one group advocating for their activity.

Small rural communities can be tied to public lands managed by the BLM in a variety of ways. Local businesses and governments depend upon the employees to maintain a population base for businesses and public services. Use of public lands managed by the BLM for livestock grazing, recreation activities, mineral development and other activities can provide employment and help maintain related businesses. In addition, the local residents depend on the public lands managed by the BLM for recreation and open space.

Small towns such as Salmon, Challis, North Fork and Leadore are unique places with shared values and a relationship with nearby public lands. Quality of life issues such as a slower pace of life, low crime rates, high levels of interpersonal trust, opportunities for community involvement, a sense of belonging and a high value placed on the health of the surrounding landscape motivates people to live in these communities. Public lands surrounding these communities are important to people because they provide a place for recreation including hiking, wildlife viewing, hunting, fishing, rafting, mountain biking, and motorized recreation. Additionally, many utilize public lands to make a living through ranching, outfitter and guiding, or mineral development. The community also cares about healthy landscapes; clean water, air, and soil are important to the people that reside in Lemhi County. Hunting is an important social and cultural aspect of the way of life in Lemhi County because of the meat it provides for families and is a tradition that has been taught and passed down for generations.

Some see threats to their opportunity to hunt and fish on public lands as a serious impact to their ability to feed their families and carry out these traditions. Many, however, are opposed to hunting in general, or are opposed to hunting outside of harvesting meat for consumption. Predator hunting generally is completed as a means to manage wildlife populations and the meat is rarely consumed.

¹ <http://www.doi.gov/pilt/county-payments.cfm>

Environmental Consequences
Alternative 1: Proposed Action

Economic

As a result of implementing the proposed action, some businesses would receive a short term increase in sales from out of town participants who would attend because of the opportunity to access BLM lands for the event. Many competitors would travel to Salmon and stay overnight for up to 4 nights to register and participate in the event and in the pre and post event meetings; they may also use Salmon as a base to access surrounding lands for hunting activities. Local businesses that may see an increase in sales as a result of implementing the proposed action include hotels, restaurants, grocery stores, sporting goods stores, and gas stations. If 100 of the 500 participants based their stay locally for 4 nights, gains to local businesses could amount to approximately \$94,000 (Table 3).

Of the approximately 56,500 comments (the majority of these comments were identical form letters) received during scoping, 56,490 indicated opposition to the event; of these, a small percentage indicated they would not ever come to Idaho to recreate if the event were allowed to proceed on BLM lands. Because it is difficult to estimate the number of people who actually had planned to visit Idaho, but who would now not visit Idaho with the implementation of the proposed action, four scenarios were developed to estimate the economic impact from the loss of this income to the tourism industry (Table 3).

Table 3. Potential Economic Impacts of the Proposed Action

	Number of Visitors Gained*	Nights	Lodging Estimate/night	Lodging	Restaurant	Other Service	Estimated Impact
Gain (no visitor loss)	+ 100	4	\$85.00	+\$34,000	+\$40,000	+\$20,000	+\$94,000
	Number of Visitors Lost**						less gain offset of \$94,000 from derby visitors
Gain	- 10	7	\$125.00	-\$8,750	-\$8,050	-\$7,000	-\$23,800
							+\$70,200
Loss	- 100	7	\$125.00	-\$87,500	-\$80,500	-\$70,000	-\$238,000
							-\$144,000
	- 1,000	7	\$125.00	-\$875,000	-\$805,000	-\$700,000	-\$2,380,000
							-\$2,286,000
	- 10,000	7	\$125.00	-\$8,750,000	-\$8,050,000	-\$7,000,000	-\$23,800,000
							-23,706,000

* Local assumptions: \$85 lodging/night, \$100/day for food, \$50/day for other services. Gains could be lower or higher depending on personal preferences of each individual participant.

**Regional/statewide-area assumptions: \$125 average lodging rate; \$25 breakfast, \$30 lunch, and \$60 dinner daily for restaurant losses; other services at \$100/day include fuel, maps, gear, etc. Statewide lodging rates presumed higher than those in Salmon, Idaho. Gains/Losses could be lower or higher depending on personal preferences of each individual potential visitor. Non-resident trip length assumed to be longer for wildlife-related visits.

Non-residents spend more than \$400 million per year on wildlife-related recreation in Idaho. There would be no net loss to this sector in Idaho with the loss of ten visitors because derby participants would offset the loss of \$23,800 by \$94,000; a net gain of \$70,200 would occur. The loss of 100, 1000 or 10,000 visitors to the state overall, would result in negligible to moderate negative economic impacts. An actual boycott by 100, 1,000 or 10,000 persons, would result in loss percentages of approximately 0.04% (\$144,000 of \$400 million potential), 0.57% (\$2,286,000 of \$400 million potential), and 5.93% (\$23,706,000 of \$400 million potential), respectively.

Impacts to overall economic development, employment, population, property values, or public services and community facilities would be difficult to discern; this is because most impacts would be spread across the state and would not be localized. Most people that commented on the public review EA, who also said that implementation of the proposed action would result in a boycott of Idaho for tourism purposes, did not specify Salmon, Idaho or Lemhi County, Idaho, therefore, the assumption is that potential overall losses would occur statewide and not in a localized manner, although in some cases, people may specifically avoid the Salmon, Idaho area.

Social

If the proposed action was selected, participants would have the opportunity to participate in a competitive hunting event on BLM lands. Positive social impacts would occur for members of the public that support and/or engage in these types of activities on BLM lands. These impacts may include personal satisfaction found when participating in a competitive event and the ability to participate in a social activity with peers or others sharing their value system.

Members of the public who oppose hunting, or oppose hunting outside of consumption of meat, would have their social values indirectly impacted in a negative manner by implementation of the proposed application. These impacts may include the displeasure of knowing an activity they find distasteful is occurring on BLM-managed lands. People who value wildlife viewing may believe their opportunity to do so would be diminished if the SRP were to be approved.

Alternative 2: No Action Alternative

Economic

There would be no impact to economic values under the No Action Alternative when compared to the current condition. Baseline conditions would not change because hunters would not participate in the derby on BLM lands and tourism would continue as it has in the past; local and regional economic conditions would remain unchanged. People who had previously planned to visit the state, but who would boycott it with the implementation of the proposed action, would follow through on their pre-existing plans to recreate in Idaho. Non-residents would continue to spend more than \$400 million per year on wildlife-related recreation in Idaho. Over 550,000 individual wildlife watchers would continue to spend over \$432 million per year in Idaho and make up 67% of all “sportsmen” who recreate in the state.

Social

Under the No Action Alternative, persons wanting to participate in the competition would not have the opportunity to do so on BLM-managed public lands and they would not have the

personal satisfaction that occurs when participating in a competitive event or in a social activity with peers or others sharing their value system on BLM lands. There would be no impact to members of the public who oppose hunting derbies on BLM lands. Members of the public who engage in predator hunting derbies, or those who support them, may perceive this as eliminating or curtailing their rights on BLM lands. If this alternative was implemented people would continue to hunt and trap on public lands as they have in the past.

Recreation

Affected Environment

Recreation opportunity across the three field offices located within the action area is diverse. Numerous developed recreation sites offer camping, boat launches, hot springs, access to destination areas, and interpretive services. Popular dispersed recreation activities include hunting, mountain biking, recreational boating, horseback riding, hiking, and OHV use. A few high use areas in the project area receive a moderate to high amount of visitation either year round or seasonally. These include river corridors, sand dunes, large multi-site campgrounds, and one hot spring site. Several outfitters and guides operate commercial guiding activities including fishing, hunting, trail riding, hiking, and OHV tours. Competitive events in the action area include mountain bike races, boat races, and endurance runs. Currently, no competitive hunting events occur within the action area.

Environmental Consequences

Alternative 1: Proposed Action

Impacts to the existing recreation resources and recreational activities as a result of implementing the proposed action would be minimal, partly because the event is proposed for early winter (between December 15 and January 15). A new opportunity for a competitive hunting event would be available. Some user-created conflicts could occur if competitors and others are concentrated in one area. However, this is unlikely as hunting is generally a dispersed activity because hunters desire to be isolated in hopes of viewing more game. Winter recreation use in the action area is low, however, some use does occur by snowmobilers, cross country skiers, and hunters. Non-winter based activities such as mountain biking and hiking does occur in lower elevation areas depending on snow cover and depth. Conflicts with other recreationists are unlikely given the vastness of the area and the low amount of recreation use during this time of year. As user-created conflicts are not anticipated to be any greater than those associated with the regular recreational hunting that occurs in the project area during a similar time of year, there are no impacts to public health and safety anticipated as a result of the proposed action.

Alternative 2: No Action

Under the No Action alternative, the BLM would deny the special recreation permit received from Idaho for Wildlife. Recreation access, opportunities for competitive recreation events, and dispersed recreation would remain consistent with current levels.

Tribal Treaty Rights and Interests

Affected Environment

The 1868 Fort Bridger Treaty, between the United States and the Shoshone and Bannock Tribes, reserves the Tribes the right to hunt, fish, gather, and exercise other traditional uses and practices on unoccupied federal lands. In addition to these rights, the Shoshone Bannock have the right to graze tribal livestock and cut timber for tribal use on those lands of the original Fort Hall Reservation that were ceded to the federal government under the Agreement of February 5, 1898, ratified by the Act of June 6, 1900.

The federal government has a unique trust relationship with federally-recognized American Indian Tribes including the Shoshone-Bannock Tribes. BLM has a responsibility and obligation to consider and consult on potential effects to natural resources related to the Tribes' treaty rights or cultural use. Resources or issues of interest to the Tribes that could have a bearing on their traditional use and/or treaty rights include: tribal historic and archaeological sites, sacred sites and traditional cultural properties, traditional-use sites, fisheries, traditional-use plant and animal species, vegetation (including noxious and invasive, non-native species), air and water quality, management of wildlife, access to unoccupied federal lands and continued availability of traditional resources, land status, and the visual quality of the environment. The project area is located on unoccupied federal lands outside of the ceded boundary. Therefore, tribal treaty rights, as defined, are applicable to the study area.

In order to ensure future generations of tribal members their opportunity to exercise off-reservation Treaty Rights, the Shoshone-Bannock Tribes' Fish and Wildlife Department works with federal land management agencies to protect, restore, and enhance fisheries and wildlife. These efforts aim to perpetuate traditional-use animal species valued in Tribal oral tradition and spiritual life, as well as big game that provide for sustenance and material needs. These are crucial trust assets for the Tribes. The Tribes see the land, the water, the animals, and the people as related and intertwined. Tribal members who exercise their treaty rights hunt for subsistence and follow an age-old "take only what you need" philosophy when gathering plants and animal resources.

By Resolution of the Fort Hall Business Council (FHBC/GAME-2014-1177), the Shoshone-Bannock Tribes have indicated opposition to the proposed action on public lands administered by the Bureau of Land Management. The resolution emphasizes the important role predator's and scavengers play in the overall ecosystem, and the Tribe's concerns about the impacts of the proposed hunt on this relationship.

Environmental Consequences

Alternative 1: Proposed Action

In terms of effects to predators and scavengers at a population scale, target species would not be affected by the proposed hunt. The coyote population, for example, would be expected to rebound quickly after each event, as has been observed by IDFG in previous coyote removal studies. Displacement of individual animals potentially important in non-subsistence Treaty Rights pursuits may incidentally occur locally during the hunt, depending upon the number and density of participants. Migratory bird species (many of which are important game species for the Tribes) would not be impacted since most would have flown south to warmer climates by the

time the event occurs. Wolf harvests would be closely managed by Idaho Department of Fish and Game rules as permitted and presently regulated. No other Treaty Rights impacts would be anticipated during the hunt events.

Alternative 2: No Action Alternative

Predatory species identified in the event would still be harvested at approximately equivalent levels, but not as a part of this event. There would not be localized increases in incidental non-game animal displacement.

Wilderness and Wilderness Study Areas (WSA)

Affected Environment

There are no designated Wilderness areas within the action area, however there are 17 WSAs, located in the project area. The Borah Peak, Boulder Creek, Burnt Creek (shared with Upper Snake), Corral-Horse Basin, Goldburg, Jerry Peak, Jerry Peak West WSAs are within the boundaries of the Challis Field Office. Eighteenmile WSA is located within the Salmon Field Office. Appendicitis Hill, Black Canyon, Hawley Mountain, Hell's Half Acre, Sand Mountain, Snake River Islands, White Knob Mountains, Burnt Creek, Cedar Butte, China Cup Butte, and Henry's Lake WSAs are located within the Upper Snake Field Office (See Appendix B). Typical activities that occur within the project area's WSAs include: hiking, hunting, camping, fishing, wildlife viewing, horseback riding, and ranching is an allowable activity in some. Federal regulations (43 CFR 6302.20) prohibit competitive events like the proposed derby within designated wilderness. Thus, if Congress designates a wilderness area within the project area, hunting derbies would not be permitted within the boundaries of the wilderness.

Hunting, by itself, is an allowed use within wilderness and WSAs, and hunters use the WSAs within the project area for big game hunts such as elk, deer, pronghorn, or mountain lion. Predator hunts for species such as the wolf or coyote, and upland bird hunting for species such as chukar or grouse are also popular. Hunting derbies are regulated through an SRP because they are competitive events. The BLM may allow hunting derbies within WSAs if they are temporary (so they do not create an expectation that they will continue after designation) and do not cause physical alterations.

Environmental Consequences

Alternative 1: Proposed Action

As a result of implementing the proposed action, derby participants may hunt within WSA boundaries. However, as explained in more detail below, most of the use associated with this event would not occur within a WSA, and it is unlikely that many of the WSAs would see any use as a result of this event. Four WSAs (Eighteenmile, Goldburg, Corral-Horse Basin, and Burnt Creek) would likely receive some use, although the terrain and limited access combined with the potential for inclement weather during the winter limits widespread use. Borah Peak, Boulder Creek, Jerry Peak, Jerry Peak West, Hawley Mountain, White Knob Mountains, Appendicitis Hill, and Black Canyon might receive use as they are within the action area, but it is highly unlikely due to their distance from derby head-quarters (Salmon), lack of suitable habitat, and topography. Derby-related activities within WSAs would be short term, less than 3 days per year for up to 5 years. All use would be limited to travel by foot only, and would likely

be over-snow travel.

Hunting has always been an allowed use within the 17 WSAs. The aspect of the proposed activity that requires the issuance of an SRP is the competitive nature of the predator derby. The derby is limited temporally, in that the event is proposed to occur over a three-day period each year for up to five years. While the applicant has stated that up to 500 hunters will participate in the derby in any given year, there is no expectation that participants will use the same areas, within or outside WSAs, for hunting each year, or that participants will expect that areas designated as wilderness will remain available for competitive hunting events. Also, given the vast expanse of the project area, the dispersed nature of hunting, and the likelihood that the WSAs will be generally inaccessible during December and January due to snow in the higher elevations, physical impacts to WSAs are expected to be negligible.

The BLM's management policy is to manage resources and resource uses on lands designated as WSAs in a manner that maintains the area's suitability for preservation as wilderness. The BLM's policy is intended to protect the wilderness characteristics of all WSAs in the same or better condition than they were on October 21, 1976, until Congress determines whether or not they should be designated as wilderness. The WSAs' suitability for wilderness is based on four criteria: Naturalness, Solitude, Primitive and Unconfined Recreation, and Special Features. When analyzing an action that would occur within a WSA, the BLM ascertains whether the proposal meets the non-impairment standard. The non-impairment standard requires that the use must be both temporary and not create surface disturbance.

Non-impairment Standard

The use of WSAs for the proposed competitive hunting event meets the non-impairment standard because the action is temporary, short term, and would not create any surface disturbance. BLM Manual 6330 defines temporary as *the use or facility is needed for a defined time period to respond to a temporary need, and would be terminated and removed prior to or upon wilderness designation. A chronic, repeated short-term use does not meet this definition of "temporary." Uses, activities, or facilities that create a demand for uses that would be incompatible with wilderness management also do not meet the definition of temporary.*

Recreational hunting is an allowable use of the WSAs within the action area and the hunting associated with the derby is not considered a chronic or repeated short term use. This is due to the dispersed nature of hunting, topography, and the size of the units. Any increase in visitation to the WSA's above the existing recreational hunting use as a result of the proposed action would be insignificant. Therefore, the proposed action is not considered a chronic, repeated short-term use. Although competitive events are prohibited from designated wilderness, design features of the proposed action state that the event would be excluded from these units upon future designation, thus removing the demand that may be perceived as incompatible with wilderness management.

Size

The proposed action would not have any impacts on the size of the WSAs in the project area. Hunting by foot or with stock would not create roads or otherwise reduce the area below the minimum threshold for size.

Naturalness

Apparent naturalness is defined in a Wilderness context as whether or not an area looks natural to the average visitor. The area must appear to have been affected primarily by the forces of nature, and any work of human beings must be substantially unnoticeable. When determining impacts an action may have on an area's naturalness, land managers look at what is left after completion of an action. For example, if a running race is permitted in a WSA, the action of many people travel the same path repeatedly over time may create a linear disturbance that would be noticeable to the average visitor and could detract from the area's apparent naturalness.

Depending on the amount of snow cover, between 4 and 12 WSAs may be visited as a result of implementing the proposed action. The dispersed nature of hunting, coupled with the likelihood that most travel would be over snow, would cause insignificant surface disturbance. Consequently, it is unlikely that the proposed action would have any impact on the WSAs' naturalness.

Solitude

Solitude refers to the visitor's opportunity to avoid the sights, sounds, and evidence of other people in the area. Factors or elements that may impact the solitude of a WSA may include size, configuration, topographic and vegetative screening, and ability of the visitor to find seclusion.

There may be chance encounters between hunters and other visitors to the WSAs. Visitors could also hear gunshots echoing as a result of hunting. Dispersed hunting is an allowed activity in WSAs so visitors may encounter hunters at any time. However, it is anticipated that there may be a small increase in hunting use of WSAs as a result of the proposed action. Therefore, impacts to solitude may occur as a result, although those impacts are expected to be short term (3 days) and intermittent. These short term impacts would not impact the solitude of a WSA to the extent that it would no longer be suitable for future designation as Wilderness.

Primitive and Unconfined Recreation

The presence or absence of an area's primitive and unconfined recreation is described by outstanding opportunities for dispersed, undeveloped recreation within the WSA's which do not require facilities, motor vehicles, motorized equipment, or mechanized transport. Due to the short term and dispersed nature of the proposed action, any impact associated with the event will not detract from the primitiveness of any of the WSA's located within the action area. The unconfined recreation opportunities would not be affected by the proposed action.

Special Features

Special features of a WSA include any ecological, geological, or other features of scientific, educational, scenic, or historical value. These are not supplemental values that would be impacted as a result of implementation of the proposed action.

Alternative 2: No Action Alternative

There would be no impact to WSAs under the No Action Alternative. The Naturalness, Solitude, and Primitive and Unconfined Recreation values would remain consistent with their current condition.

CHAPTER 4 – CUMULATIVE EFFECTS OF ALTERNATIVES

This section discloses the incremental impacts that the alternatives are anticipated to have when considered in the context of impacts associated with past, present, and reasonably foreseeable future actions that have occurred, or are likely to occur, in the area. The Cumulative Impact Assessment Area (CIAA) consists of approximately 13,082,392 acres (Appendix B) and is the Idaho Falls District administrative unit boundary (excluding Pocatello Field Office) as defined by the BLM’s National Operations Center. The total acreages per land management agency are listed in Table 4.

Table 4. Land Status of CIAA

Land Status (Ownership/land management agency)	Acres
Bureau of Land Management	3,101,128
U.S. Forest Service	5,849,863
National Park Service (Yellowstone National Park)	35,721
Dept. of Energy (Idaho National Laboratory)	562,009
State of Idaho	469,589
Private	2,974,349
Other (historic waters, military, national wildlife refuge, etc.)	89,663

Past, present, and reasonably foreseeable actions that have impacted the CIAA to varying degrees include livestock grazing, vegetation management, wild land fire, land use conversion and infrastructural development. Although these actions probably do not account for all of the actions that have or are likely to occur in the CIAA, GIS analysis, agency records, and professional judgment suggest that they have contributed to the vast majority of cumulative impacts that have occurred in the CIAA.

Past and Present Actions

Livestock grazing has a long history in the CIAA, dating back to the late 1800s. Throughout its history, livestock grazing has been characterized by localized areas of intense use. Hunting, trapping, wildlife viewing, hiking, and snowmobiling have been popular recreation activities within the CIAA. OHV use occurs on the roads and two-tracks within the CIAA. Range improvements have occurred throughout the CIAA to improve grazing management and include fencing and water developments. Timber harvest has occurred within the CIAA and many of the roads that are currently still utilized were created for timber harvests. Mining exploration, namely thorium exploration, has occurred in the CIAA and can still be seen by the small mounds of soil scattered throughout.

Hunting, trapping, fishing, wildlife viewing, backpacking, snowmobiling, automobile and OHV touring, horseback riding, mountain biking, and day use hiking all occur within the CIAA. Forestry projects including thinning and conifer encroachments continue to occur within the CIAA. Thorium exploration continues to occur within the CIAA. Reclamation is ongoing of multiple abandoned mine lands within the CIAA. Wildlife Services conducts Wildlife Damage Management within the area when a request for assistance is received. In 2013, 4 wolves and 366 coyotes were removed in Eastern Idaho, this work was conducted on BLM, USFS, Idaho State and privately managed lands.

Reasonably Foreseeable Actions

Reasonably foreseeable future actions include continuation of the past and present actions as described above. The level and character of livestock grazing and agricultural development are anticipated to remain consistent into the foreseeable future. Hunting, trapping, fishing, wildlife viewing, backpacking, snowmobiling, automobile and OHV touring, horseback riding, mountain biking and day use hiking are likely to increase within the CIAA as the population continues to grow and the demand for access to solitude increases. Motorized recreation has continued to increase in popularity in Idaho and would likely increase within the CIAA. Power line and fiber optic lines are likely to increase within the CIAA. Thorium exploration is likely to continue and may increase as more uses for thorium are discovered and the demand increases. Wildlife Services would likely continue to conduct Wildlife Damage Management within the area as requests for assistance are received. Several vegetation manipulation projects are planned throughout the CIAA through conifer thinning and sagebrush and native grass seeding projects. Several Travel Plans and landscape level projects are being proposed within the CIAA. This includes the South Half Travel Management Plan, the Upper Snake Field Office Resource Management Plan, and the Canyon to Big Timber Watershed Environmental Assessment. Two special recreation permits have been issued for activities within the CIAA; a wagon ride permit, and a foot race permit. One additional special recreation permit application has been received for a wildlife viewing contest within the CIAA. If permitted, this event would occur during the same time of year as the proposed event, but on different days.

Cumulative Impacts Associated with Past, Present and Reasonably Foreseeable Future Actions

Alternative A – Proposed Action

Alternative A would contribute very little to the collective impact associated with past, present and reasonably foreseeable future actions. The proposed action, when added to the existing and reasonably foreseeable future use, would result in increased use of the CIAA for recreational activities. However, these SRP's are short term (3 days or less a year) and do not overlap, therefore the cumulative incremental effects would be negligible. Livestock use would remain at current levels, and the number of road miles within the area would not increase as a result of implementing Alternative A. The amount of suitable habitat for wildlife species that occur in the CIAA would remain the same. Socio-economic impacts could range from slightly positive to moderately negative, depending on whether or not visitation boycotts materialize. The actions

described in Alternative A would not substantially alter the current or expected future conditions within the CIAA.

Alternative B – No Action

Alternative B would also contribute very little to the collective impact associated with past, present and reasonably foreseeable future actions. Livestock use would remain at current levels, and the number of road miles within the area would not increase as a result of implementing Alternative B. The amount of suitable habitat for wildlife species that occur in the CIAA would remain the same. Socio-economic conditions would remain the same. The actions described in Alternative B would not substantially alter the current or expected future conditions of natural resources in the CIAA.

CHAPTER 5 - CONSULTATION AND COORDINATION

The public was notified of the proposed action on July 31, 2014, by a scoping letter. Coordination meetings between the Bureau of Land Management and IDFG occurred on July 28, August 28, September 3, and September 23, 2014. On August 28, 2014, a meeting was held with tribal members to discuss the proposal and obtain their comments. In addition, as is required by regulation, a Notice of Proposed Action in Wilderness Study Area (WSA) was mailed on August 1, 2014, to inform the interested public of the proposed action.

A 15-day public scoping period occurred between August 4 and 18, 2014. At that time, a summary description of the proposed action was made available on the BLM’s eplanning site at https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do . Interested publics and other federal and state agencies were given the opportunity to provide comments or consult on the action.

Following the scoping period, and development of the EA, it was circulated for a 15-day public comment period beginning October 2, 2014. Due to interest from the public, the comment period was extended through October 23, 2014. Approximately 39,000 comments were received during the public comment period.

Table 5. List of Preparers

Section of EA	Specialist
Recreation/Wilderness/ Wild and Scenic Rivers/ Visual Resources/Lands with Wilderness Characteristics	Liz Townley
Wildlife/TES Animals/Migratory Birds	Vincent Guyer
Socio-Economic	Kyra Povirk
Tribal and Treaty Rights	Steve Wright

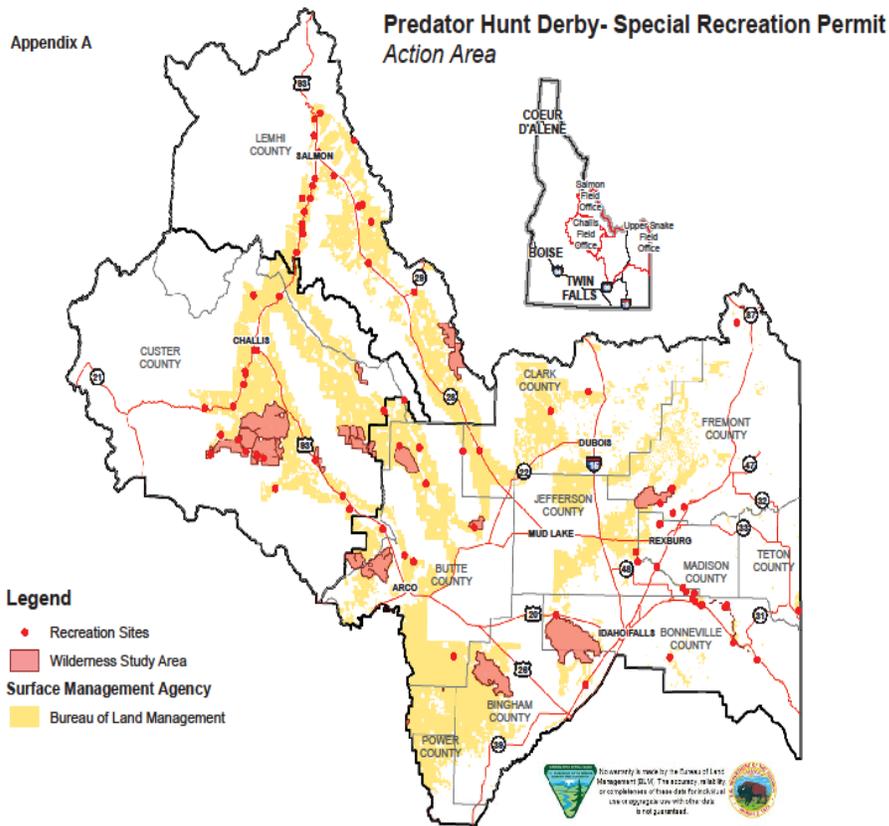
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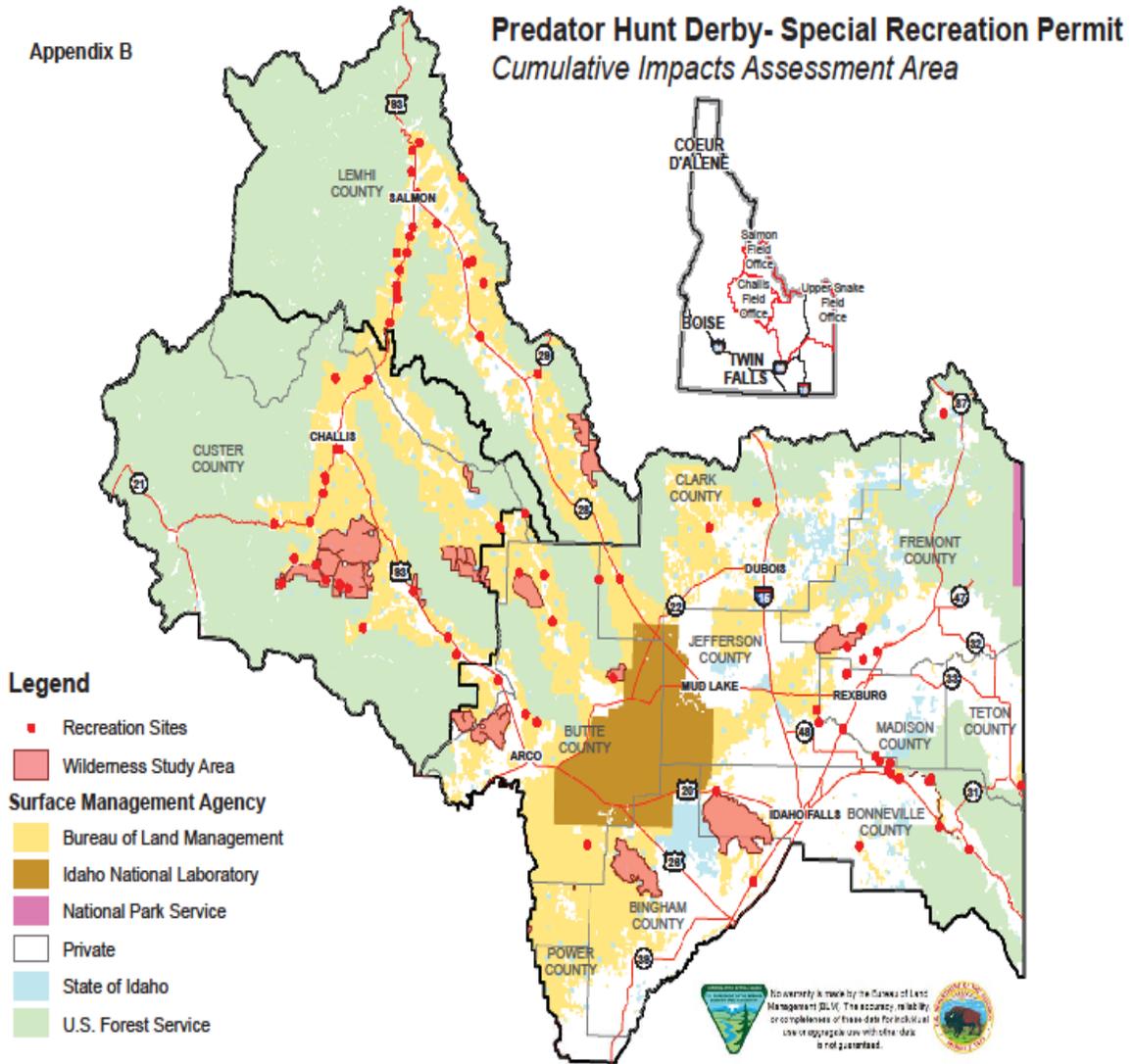
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Appendix A – Map of the proposed action area





Appendix C-- Comment Response

Economic Impacts

Comments Topic Summary

Commenters disagree with the economic analysis in the EA, feeling that the economic losses to the State of Idaho will be greater than those presented in the analysis. Many feel that wildlife watchers will boycott the state entirely as a means to show their disapproval of the predator derby.

BLM Summary Response

It is difficult to estimate the number of people who actually had planned to visit Idaho, but who would now not visit Idaho with the implementation of the proposed action. Because of this, four potential scenarios were developed in the effects analysis to estimate possible economic loss. The EA did not assert that the maximum economic loss was tied to the loss of 1000 visitors – these figures were provided as examples because the exact number of people who had planned to recreate in Idaho, who would not do so with the implementation of the proposed action, is unknown. The numbers can be extrapolated to 10,000 or 100,000 for comparison purposes. The EA was modified to reflect potential visitor losses from ten to ten thousand persons.

The Potential Economic Impacts of the Proposed Action table was modified to reflect the comparison provided by Rocky Mountain Econometrics.

The BLM does not authorize the taking of non-target species; this analysis focuses on the issuance of a Special Recreation Permit to hold an event.

A range of potential economic losses are provided in the effects analysis of the EA. Baseline wolf watching-specific economic data are unavailable for the area of interest, which falls outside of Yellowstone and Grand Teton National Parks, where most wolf-watching in the region occurs. The 2013 derby resulted in no wolves being taken and because wolves are difficult to see, let alone hunt, it is unlikely that a large number of wolves would be taken in the three day derby; impacts due to a loss of wolf-watching opportunities are highly unlikely. No wolves were taken in the 2014 Derby.

The benefits of wildlife watching are discussed in the EA: “Overall, outdoor recreation in Idaho supports 37,000 jobs, generates \$154 million annually in state tax revenue, and generates \$2.2 billion annually in retail sales and services. Non-residents spend more than \$400 million per year on wildlife-related recreation in Idaho. The largest single category of non-resident wildlife-related recreation spending in Idaho is wildlife watching. Over 550,000 individual wildlife watchers spend over \$432 million per year in Idaho and make up 67% of all “sportsmen” who recreate in the state. Idaho as a state has the highest overall per capita participation in non-hunting-related recreation in the U.S. Activities in this statistic include backpacking, cycling (on- and off-road), bird watching, car camping,

canoeing, climbing, fly fishing, hiking, kayaking, rafting, skiing (on- and off-resort), snowshoeing, and trail running.”	
Comments	
Commenter Rocky Mountain Econometrics	Table 2 (pg. 6 of comment) The following Table 2, brings together BLM’s Tables 2 and 3. This table makes it easier to compare the benefits of the Derby to the costs of the Derby more directly.
Commenter Edward Loosli	Comment If permitted by the BLM, this predator hunt derby will cause tremendous economic loss to Idaho in general and Eastern Idaho in particular, because millions of people will boycott Idaho and find other states to visit, that demonstrate a higher standards of respect for wildlife.
Commenter Pamela Williams	Comment I disagree with the EA assertion that the maximum economic loss is only a base of 1000 visitors if opponents make good on their statements NOT to visit Idaho if this derby occurs. The number of disgusted potential visitors is vastly underestimated. Furthermore, the EA did not address those of us who live in Idaho and who will choose to spend our vacation dollars out of state, preferring a place that actually values wildlife and avoids hate-based persecution and policy.
Commenter Susan Clark	Comment There is no consideration for economic losses from accidental “taking” of non-target species and resultant reduction in wildlife viewing opportunities.
Commenter Western Environmental Law Center	Comment The EA Contains a Misleading Cost/Benefit Analysis..., the derby is likely to impact wolf populations, thereby depressing tourism from wolf watching. The fact that many wildlife viewers who learn of this event will avoid Salmon further increases the cost of the killing contest, tipping the scale even further against allowing the contest on public lands administered by the BLM.... Wolf watching is a major economic revenue source for Idaho. Again, the derby is likely to impact wolf populations, thereby depressing tourism from wolf watching. Wildlife viewers and other tourists who are offended by this event will avoid Salmon, and potentially Idaho, thus further increasing the cost of the killing contest.

<p>Commenter Humane Society of the United States</p>	<p>Comment Failure to include an economic analysis of the benefits of wildlife watching on Idaho’s public lands provide (FWS 2008, U.S. Department of the Interior - Fish and Wildlife Service and U.S. Department of Commerce -U.S. Census Bureau 2011). Failure to include an economic analysis of not holding a wildlife-killing derby on Idaho’s federal public lands and include the benefits to the BLM.</p>
<p>Commenter Western Watersheds Project/ Center for Biological Diversity</p>	<p>Comment By comparing the economic benefits to the Salmon, Idaho area to the economic costs to the state as a whole, it makes a crucial error. The BLM makes the mistake of comparing two distantly related issues when it should, and could, compare economic impacts for similar areas. It doesn’t make sense to conclude that the economic costs would be distributed over the entire state when most historic wolf viewing activity took place within the project area</p>
<p>Commenter Jim Hoylan</p>	<p>Comment While the local area might receive an economic short-term boost from this event, the public relations black eye that it gives to the State will probably turn away an equal number of would-be recreationists that would have come if Idaho, and the federal agencies that manage land here, were to present itself as an enlightened steward of its wildlife resource... the BLM, in my interpretation, seems to minimize the predicted lost revenue from visitors that would not come to Idaho due to the negativity associated with this event (“...would result in minimal economic impacts,... and “...impacts to local economic development, employment, population, property values, or public services and community facilities would be negligible.”)- yet the range of values given for this total estimated loss (Table 3) is ~\$24,000 to \$2.4 million, which is hardly “negligible” and even the lowest estimate is likely more than or similar to the value of any private property damage caused by predators. So this supposed predator-caused loss should also be viewed as “negligible,” not “significant” as the document states.</p>
<p>Commenter Mark A. Wuebben</p>	<p>Comment Our family has spent money vacationing in Idaho because of its natural beauty and wildlife. How does this proposal enhance or draw tourism or vacationers who enjoy and honor the natural beauty and wildlife? It seems to me from an economic standpoint that Idaho and the BLM would be injuring a natural resource and a positive economic draw to the area by allowing a killing competition.</p>
<p>Commenter Dogan Ozkan</p>	<p>Comment The economic gain from hosting the derby would be minimal as compared to Idaho’s overall economy and tourism industry, which could be seriously affected by the economic losses caused by the derby.</p>

<p>Commenter Elise Allen</p>	<p>Comment The economic analysis found that while the town of Salmon and surrounding areas might receive a \$94,000 boost, the state as a whole could miss out on anywhere from \$23,800 to \$2,380,000 depending on how many people decide to not visit the state due to its draconian predator management policies. Admittedly, it is hard to quantify exactly how much the state will lose in economic activity but, because the world press has focused on Idaho’s wolf and predator management recently, it is clear that Idaho has a very poor image among those who value wildlife and would come to visit the state to see it.</p>
<p>Commenter Mark Mansfield</p>	<p>Comment The economic analysis is a case of the tail of Salmon, ID, wagging the state of Idaho, and transforming it into a rather unappealing place to visit. “The economic analysis found that while the town of Salmon and surrounding areas might receive a \$94,000 boost, the state as a whole could miss out on anywhere from \$23,800 to \$2,380,000 depending on how many people decide to not visit the state due to its draconian predator management policies. Admittedly, it is hard to quantify exactly how much the state will lose in economic activity but, because the world press has focused on Idaho’s wolf and predator management recently, it is clear that Idaho has a very poor image among those who value wildlife and would come to visit the state to see it.” I can assure you that another thrill kill “derby” in Salmon will manage to further eviscerate Idaho’s already highly problematic image among wildlife watchers – and this will translate into the loss of exponentially more eco-tourist dollars than the one- off “boost” Salmon may receive.</p>
<p>Commenter Ann Parry</p>	<p>Comment During the predator-killing contest there would be an economic impact on the communities of Salmon and Challis. Whether the impact is positive or negative depends on how a congregation of hunters, protesters and media is viewed. Yes, businesses would temporarily benefit, and the longterm impact is negative, because a predator-killing derby sends the message that there is no regard for the wildlife that would be killed: wolves, coyotes, skunks, weasels, jackrabbits, raccoons and starlings.</p>
<p>Commenter Form Letter 2</p>	<p>Comment Wolf watching has brought in millions of dollars into Idaho and tourism is a major economic revenue source. Furthermore, issuing the permit is likely to affect tourism in Idaho as those who value wildlife decide not to visit due to the state's draconian predator management policies.</p>

<p>Commenter Form Letter 5</p>	<p>Comment the BLM analysis team and any other agencies and contractors should consider the following:</p> <p>Examining both the positive economic impacts of this activity as well as the potential economic consequences associated with conducting an unpopular activity on tourism revenues to the State and the full costs to the BLM of administering and monitoring this event with associated law enforcement costs; and</p>
<p><u>NEPA- Wildlife SRP</u></p>	
<p>Comments Topic Summary</p>	
<p>Commenters feel that the BLM failed to adequately address an alternative wildlife viewing SRP request for an event that could occur simultaneously with the predatory derby in a similar area.</p>	
<p>BLM Summary Response</p>	
<p>The purpose and need statement found in the Environmental Assessment on page 3 is” to respond to an application submitted by Idaho for Wildlife to host a competitive event on public lands administered by the Idaho Falls District Office. The BLM needs to consider the proposed action as the agency is responsible, under the Federal Land Management and Policy Act (FLPMA), to manage public lands for multiple uses in a manner which recognizes the nation’s need for recreation opportunities on public land.” While the BLM Salmon Field Office did receive a Special Recreation Permit application for a wildlife viewing contest, the analysis and processing of this application would be done separately from the Idaho For Wildlife application. The wildlife viewing contest SRP was included in the Cumulative Effects section found in Chapter 4 of the EA</p>	
<p>Comments</p>	
<p>Commenter Hank Perry</p>	<p>Comment BLM has ignored a proposed SRP for wildlife viewing which i am aware of. If your public charge is to manage recreation for wildlife habitat, your proposed SRP for killing will keep environmentally interested tourists away and further demonstrate that Idaho chooses to have a war on predators, and cannot manage its resources in the public interest.</p>
<p>Commenter Kathy Gregg</p>	<p>Comment The Environmental Assessment failed to adequately address an alternative SRP request for a wildlife viewing contest submitted by Western Watersheds Project and Center for Biological Diversity which, if the permit is issued, would take place instead of the derby or at the same time. The Environmental Assessment merely mentions the competing SRP and fails to consider or propose to deny the derby permit and approve the wildlife viewing context permit, or another alternative to allow both events during the same weekend. Even if the BLM were to issue the competing SRP for the wildlife viewing contest but require it to take place either before or after the predator killing contest, there was no assessment of the inherent conflicts of the two. If the wildlife viewing contest were to take place before the predator killing contest then</p>

	<p>participants would be injured by knowing that wildlife they viewed could likely be killed for the bloodlust of the killing contest participants. If the wildlife viewing contest were to take place after the predator killing contest then participants would be injured because there would be less possibility of seeing predators on the landscape.</p>
<p>Commenter Humane Society of the United States</p>	<p>Comment The BLM failed to consider holding a contest for wildlife/wildlands/cultural artifacts photographers, who could photograph and promote these unique aspects of BLM lands in Idaho while providing economic opportunities for local communities. This alternative would not deplete the wildlife and harm the wildlands and would be far more sustainable for generations to come.</p>
<p>Commenter Western Watersheds Project/ Center for Biological Diversity</p>	<p>Comment The BLM failed to consider reasonable alternatives to the proposed action and the no action alternative. WWP and the Center have requested a wildlife---viewing contest SRP which requests dates for the same time period as those requested by IFW. The BLM failed to consider an alternative that would grant a SRP to WWP and the Center rather than granting a SRP to IFW.</p>
<p>Commenter Stephanie Bell</p>	<p>Comment Respectfully, I urge you to deny the SRP request for a predator killing contest on BLM lands in early January. The EA failed to adequately address an alternative SRP request for a wildlife viewing contest (in which no animal would be harmed), which is confounding. Both events should be considered equally and there was no assessment of the inherent conflicts of the two proposed events.</p>
<p>Commenter Linda Magri</p>	<p>Comment Even if the BLM were to issue the competing SRP for the wildlife viewing contest but require it to take place either before or after the predator killing contest, there was no assessment of the inherent conflicts of the two. If the wildlife viewing contest were to take place before the predator killing contest then participants would be injured by knowing that wildlife they viewed could likely be killed for the bloodlust of the killing contest participants. If the wildlife viewing contest were to take place after the predator killing contest then participants would be injured because there would be less possibility of seeing predators on the landscape.</p>
<p>Commenter</p>	<p>Comment</p>
<p><u>NEPA- EIS</u></p>	
<p>Comments Topic Summary</p>	

<p>Commenters feel issuing a SRP for a predator hunt on public land would constitute a major federal action and would have a significant impact on the human environment and therefore requires the preparation of an Environmental Impact Statement(EIS).</p>	
<p>BLM Summary Response</p>	
<p>The BLM NEPA Handbook (H-1790-1) states on Page 69 that, "Actions are analyzed in an EA if the actions are not categorically excluded, not covered in an existing environmental document, and not normally subject to an EIS. Use the EA analysis to determine if the action would have significant effects; if so, you would need to prepare an EIS. If the action would not have significant effects, prepare a Finding of No Significant Impact (FONSI)." The Salmon Field Office analyzed the impacts of the actions described in the proposed action of the Predator Hunt Derby EA DOI-BLM-ID-I000-2014-0002-EA. As discussed in the FONSI dated November 2014 The authorized officer has reviewed the Predator Hunt Derby EA including the explanation and resolution of any potentially significant environmental impacts, and reviewed and thoroughly considered public comments regarding the EA. The authorized officer has also reviewed the ten Intensity Factors for significance listed in 40 CFR 1508.27 and has determined that the proposed action (Alternative A), along with the design features and terms and conditions described, will not result in significant impacts. Therefore, an Environmental Impact Statement has not been prepared</p>	
<p>Comments</p>	
<p>Commenter S R Miles</p>	<p>Comment I am also concerned that the BLM has not prepared a full environmental impact statement (EIS) to analyze the many acute impacts of a hunting derby on our natural resources. The BLM's brief environmental assessment (EA) is inadequate to properly evaluate the impacts of the derby on wildlife, public lands, and potential wilderness. The proposed contest would take place over a vast expanse of BLM lands, covering a matrix of land types inhabited by multiple sensitive and threatened species, and recur annually for five years. The BLM's decision on whether to issue a permit would have a significant impact on the human environment, the requisite for preparing a full EIS rather than a summary EA. Federal law requires and the public expects the BLM to provide a thorough evaluation of its decision concerning the derby.</p>
<p>Commenter American Wild Horse Preservation Campaign</p>	<p>Comment The BLM's decision on whether to issue a permit would have a significant impact on the human environment, the requisite for preparing a full EIS rather than a summary EA.</p>
<p>Commenter Defenders of Wildlife</p>	<p>Comment Accordingly, BLM needs to prepare an environmental impact statement (EIS) to evaluate the significant impact of this proposed action on public lands and other public values and multiple uses</p>

<p>Commenter Western Environmental Law Center</p>	<p>Comment Because it is a major federal action significantly affecting the quality of the human environment, the Derby must be analyzed in an EIS... An Environmental Impact Statement should be conducted to analyze all potential significant direct, indirect, and cumulative impacts and evaluate a full range of alternatives.</p>
<p>Commenter Humane Society of the United States</p>	<p>Comment Because the BLM’s EA is woefully inadequate, cursory, missing key information and not based upon the best available science, The HSUS contends that the BLM must prepare a full EIS that adequately examines the harms associated with hundreds of people roaming on federal public lands (often in OHVs) shooting toxic lead ammunition at unlimited numbers of wildlife for three days each year for a five year period on wildlands, wildlife (including federally-protected species), cultural resources and people.</p>
<p>Commenter Friends of Wildlife</p>	<p>Comment if BLM decides to take another action on the permit, it must prepare an Environmental Impact Statement (EIS).2 Issuing a permit to conduct the derby would affect millions of acres of public land, and countless wild animals, which constitutes a major federal action.</p>
<p>Commenter Project Coyote</p>	<p>Comment We believe that the extremely high level of controversy, the potential risk to public health and safety involved, and the potential for significant ecological effects demand that this proposal be evaluated in an Environmental Impact Statement (EIS) to ensure that a well-reasoned, legal, and proper decision is made in compliance with the National Environmental Policy Act (NEPA), and in compliance with BLM’s legal and policy mandates.</p>
<p>Commenter Western Watershed Project/Center for Biological Diversity</p>	<p>Comment Where this is a major proposal to conduct a predator---hunting contest over five years with an underlying objective to reduce predator populations on 3.1 million acres of public land, BLM must prepare a complete and thorough environmental impact statement (“EIS”) to consider the environmental consequences of the predator derby proposal.</p>

<p>Commenter Vera</p>	<p>Comment The proposed special use import permit would have a significant impact on the human environment requiring the BLM to prepare a full Environmental Impact Statement, rather than just an Environmental Assessment. The citizens of the United States expect the BLM to conduct its due diligence before ever considering Idaho for Wildlife’s archaic request to hold a predatory derby on public lands in Idaho.. Please deny the request for a special use permit to hold a predatory killing derby on Idaho’s public lands.</p>
<p>Commenter Christine Stewart</p>	<p>Comment If you do proceed with an analyses as it seems you intend on this application to conduct a predator derby on BLM lands in Idaho’s Salmon District including up to 500 paying participants, I believe that the BLM analysis team and any other agencies and contractors should consider the following.....Given the importance and controversy associated with the above issues, I also believe that this activity requires a complete environmental impact analysis rather than a less comprehensive approach.</p>
<p>Commenter Nickie Duong</p>	<p>Comment If you proceed any further with this proposal, you must prepare a thorough environmental impact statement. And, at a minimum, you must investigate reasonable alternatives that are consistent with the values of these public lands -- including alternative uses of these lands, such as for wildlife-viewing contests instead of wildlife-killing contests. You must also rigorously assess the likely consequences of allowing such a contest to take place, including for wildlife populations as well as predator-prey dynamics on the affected public lands, wilderness study areas, and areas of critical environmental concern.</p>
<p>Commenter A.M.M. Booms</p>	<p>Comment I am concerned that the BLM has not prepared a full environmental impact statement (EIS) to analyze the many acute impacts of a hunting derby on our natural resources. The BLM's brief environmental assessment (EA) is inadequate to properly evaluate the impacts of the derby on wildlife, public lands, and potential wilderness. The proposed contest would take place over a vast expanse of BLM lands, covering a matrix of land types inhabited by multiple sensitive and threatened species, and recur annually for five years. The BLM's decision on whether to issue a permit would have a significant impact on the human environment, the requisite for preparing a full EIS rather than a summary EA. Federal law requires and the public expects the BLM to provide a thorough evaluation of its decision concerning the derby.</p>
<p>Commenter Form Letter 5</p>	<p>Comment Given the importance and controversy associated with the above issues, I also believe that this activity requires a complete environmental impact analysis rather than a less comprehensive approach.</p>

<u>NEPA-Process-Cumulative Effects</u>	
Comments Topic Summary	
<p>Commenters feel that the EA has failed to adequately analyze the cumulative effects of issuing a SRP for a predator derby on BLM managed lands. Specifically the cumulative effects associated with predator management outside the predator derby.</p>	
BLM Summary Response	
<p>As stated in .1 of BLM Manual 6521 – State Agencies it is important to note that:</p> <p>“...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal species...”In relation to wildlife the BLM decision to issue a SRP for a predator derby focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game. The <i>Cumulative Effects</i> section of the EA states, “the amount of suitable habitat for wildlife species that occur in the CIAA would remain the same.” Language was added to the <i>Cumulative Effects</i> section of the EA concerning the past and present actions of Wildlife Services conducting Wildlife Damage Management within the CIAA and also the expectation that this management would continue as a reasonably foreseeable action.</p>	
Comments	
<p>Commenter Western Environmental Law Center</p>	<p>Comment The EA Fails to Properly Consider Cumulative Impacts... The Derby EA does not adequately analyze cumulative impacts. For example, the EA fails to consider the cumulative impact of the derby together with Idaho’s state management of wolves and carnivore species. This failure contributes to the EA’s improbable, unsupported conclusion that the derby will not affect carnivore populations, even though, as discussed above, killing from the derby is likely to be additive to the killing that would have occurred otherwise.</p>
<p>Commenter Humane Society of the United States</p>	<p>Comment BLM has failed to account for the cumulative impacts associated with wildlife mortalities from U.S. Department of Agriculture-Wildlife Services, hunters, trappers and livestock growers, who are not involved in these contest hunts. All of these entities kill large numbers of wildlife in Idaho each year and these impacts must be considered.</p>
<p>Commenter Western Watersheds Project/ Center for Biological</p>	<p>Comment the EA fails to fully consider the cumulative effects of the proposed action in association with relevant past, present, and reasonably foreseeable future actions including the continuation of the derby over the next five years, impacts on absolute numbers of gray wolves in Idaho, past and present wolf population trends in Idaho, past harvest levels, current harvest levels outside the proposed derby, and a quantitative estimate of the number of wolves that could be killed by the 500 participating hunters</p>

Diversity	
<u>NEPA-Process-Reasonable Range of Alternatives</u>	
Comments Topic Summary	
Commenters feel that the BLM failed to analyze a reasonable range of alternatives as required by NEPA. Commenters feel that the BLM should have included alternatives which excluded the exclusion of certain areas from the SRP, fewer contestants, or a shorter term for the permit.	
BLM Summary Response	
Page 7 of the EA in the section titled <i>Decision to be Made</i> states,” Based on the NEPA analysis, the authorized officer will approve the application and issue a SRP, approve the application and issue a SRP subject to terms and conditions, or deny the application.” The stated Purpose and Need in the EA is to “respond to an application submitted by Idaho for Wildlife to host a competitive event on public lands administered by the Idaho Falls District Office.” In Chapter 2 , Alternative A of the EA, The BLM has included a set of design features and stipulations for the proposed event intended to ensure that derby participants comply with all regulations associated with public lands. The propose action also identifies a 1-year probation period requiring the applicant t0 complete the annual permit maintenance and to follow all applicable laws, regulations, and stipulations in order for the event to be permitted for subsequent years.	
Comments	
Commenter Western Environmental Law Center	Comment The EA Fails to Consider an Adequate Range of Alternatives.... The EA provides just two alternatives: the applicant’s proposed action and no action. The EA fails to raise other reasonable alternatives, such as imposing mitigation measures on the event, or excluding key habitat areas from the geographic scope of the permit. Organizations also suggested the BLM limit the analysis to a single year, to give time for the BLM to analyze the effects of the event before authorizing the event again.
Commenter Humane Society of the United States	Comment The BLM failed to analyze a “reasonable range of alternatives” as required by NEPA. 40 CFR 1508.25. The range of alternatives offered by the BLM’s EA consisted of two choices: 1) to permit contest hunts to allow the kill of unlimited numbers of wildlife by hundreds of shooters; and 2) not permit contest hunts. Courts, however, have found fault in agencies’ NEPA analyses that fail to consider a reasonable range of alternatives that could offer opportunities for mitigation. The BLM could mitigate the inevitable environmental harms of the contest hunt by limiting conditions on the contest-hunting permit.

<p>Commenter Western Watersheds Project/ Center for Biological Diversity</p>	<p>Comment With regard to the derby proposal in particular, the BLM also failed to develop and describe a reasonable alternative which would avoid WSAs and ACECs and/or require stricter stipulations, such as a fewer number of contestants, shorter permit term, and/or smaller area of public lands in which it would occur.</p>	
<p>Commenter Form Letter 5</p>	<p>Comment the BLM analysis team and any other agencies and contractors should consider the following:</p> <p>1. Providing an alternative that limits the scope of the permit to one year—a five-year term, considering the changing western environments, is simply too long;</p>	
<p><u>NEPA-Other</u></p>		
<p>Comments</p>		
<p>Commenter Western Environmental Law Center</p>	<p>Comment THE BLM HAS NOT FACILITATED MEANINGFUL PUBLIC PARTICIPATION... The BLM has not made “diligent efforts to involve the public.” Indeed, the opposite is true: the BLM has “fast-tracked” the NEPA process in order to “get the public comment period started and finished as fast as possible” and thus allow the agency to concentrate on the anticipated “aftermath.”. This fast-tracked process, including lightning-fast scoping and comment periods, has prevented full and meaningful participation.</p>	<p>Response The public was notified of the proposed action on July 31, 2014, by a scoping letter and a Notice of Proposed Action in Wilderness Study Area (WSA) was mailed on August 1, 2014, to inform the interested public of the proposed action. On August 4, 2014, the BLM initiated a 15-day public scoping period. Approximately 56,500 comments were received during the scoping period. Roughly 56,490 commenters indicated opposition to the event; the majority of these letters were copies of nine different form letters that expressed general disapproval of a hunting derby.</p> <p>Approximately 500 unique/personalized comments were received as a result of the scoping period. The Environmental Assessment (EA) DOI-BLM-ID-I000-2014-0002-EA was prepared to analyze the potential environmental impacts that could result from authorizing the application received by Idaho for Wildlife to host a predator hunt derby on BLM managed public lands as described in the proposed action. The EA assists the BLM in project planning, ensures compliance with the</p>

		<p>National Environmental Policy Act (NEPA), and provides the analysis for making a determination of significance based on the consideration of context and intensity of the impacts.</p> <p>Following the scoping period, a draft EA was made available for a 15-day public comment period beginning on October 2nd. Due to interest from the public along with, the BLM’s failure to include the bibliography in the draft EA, the public comment period was extended through October 24th. Approximately 39,000 comments were received during the public comment period. The majority of these were copies of six different form letters with the majority opposed to the event. Approximately 500 unique comments were received and a portion of these comments were determined to be substantive comments using the criteria outlined in BLM Handbook H-1790-1. These comments and the BLM response to these comments and are incorporated by reference in this decision record and can be found in Appendix C of the EA on page 34 and on the BLM ePlanning site:</p>
<p>Commenter Western Environmental Law Center</p>	<p>Comment The EA’s Purpose and Need Statement Is Not Appropriately Drawn... the statement of purpose and need in this EA manages to be both unreasonably narrow and unreasonably broad. For instance, it is unreasonably narrow to consider only BLM’s responsibility under FLPMA to manage for recreation, while ignoring BLM’s responsibilities to manage for wildlife, watershed, scenic, and other resources under FLPMA, its responsibility under NEPA to act as trustee of the environment, and its responsibility</p>	<p>Response It is the BLM’s responsibility under FLPMA to respond to an application for a Special Recreation Permit for a predator derby. The BLM has analyzed potential impacts to wildlife habitat and other resources that could result from the issuance of the SRP in Chapter 3 of the EA.</p>

	<p>under the ESA to conserve imperiled species, and ensure the continued health of recovered species.</p> <p>The statement is also unreasonably broad because it defines the purpose of the action as to “respond to an application.” This nebulous purpose gives total discretion to BLM to respond as it sees fit—as long as it manages for “recreation.” Such discretion is inappropriate under NEPA</p>	
<p>Commenter Western Watersheds Project/ Center for Biological Diversity</p>	<p>Comment</p> <p>The EA BLM violates NEPA by failing to identify any scientific basis for its conclusion in the EA that the Idaho wolf population "would not be affected by the proposed hunt" with 500 hunters targeting wolves and other species over five years. EA at 19---20. This violates NEPA because such unsupported, conclusory statements are insufficient where definitive scientific information is available on Idaho predator populations from IDFG and other sources.</p>	<p>Response</p> <p>“As stated in .1 of BLM Manual 6521 – State Agencies it is important to note that:</p> <p>“...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal species...”</p> <p>In relation to wildlife this EA focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game.” (EA pg. 4)</p>
<p>Commenter</p>	<p>Comment</p>	<p>Response</p>
<p>Commenter</p>	<p>Comment</p>	<p>Response</p>
<u>Wildlife – Effects of Predator Removal</u>		
Comments Topic Summary		
<p>Commenters refer to various studies that call into question the effectiveness of attempts to control predators. Many feel that these attempts are counterproductive leading to increased populations.</p>		
BLM Summary Response		

There are many and varied studies regarding the effectiveness of predator control. The purpose and need stated in the EA is not to reduce predator numbers in the action area but to respond to a special recreation permit application from Idaho for Wildlife to hold a predator derby.

As stated in .1 of BLM Manual 6521 – State Agencies it is important to note that:

“...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal species...”

In relation to wildlife this EA focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game. The BLM has recognized Idaho Fish and Game as the wildlife management expert for this analysis. The Affected Environment section of the EA states: “The IDFG does not expect the species to be affected at the population scale. IDFG’s management goal is for reduction, not elimination of predators. Predator control often involves removal of animals, but the intent is not to completely eliminate predators. The long-term goal is to reduce predator numbers enough to allow increased game numbers, increased harvest opportunities, and to maintain viable populations of all wildlife, including predators (IDFG, 2012).”

Comments

Commenter	Comment
Emily Pompei	Science has shown indiscriminate killings of coyotes, wolves, raccoons, etc. is not effective at reducing their populations. Instead, they quickly rebound and fill any vacancies. Coyotes, for example, like other predators, self-regulate their population based on the area they live in. Unexploited, coyote family groups establish territories which they defend from other coyotes seeking new territories and mates, and will then keep the local population stable. Lethal coyote removal including killing contests, disrupts this stable social structure, allowing for vacant territories to be filled by outside coyotes.
Elisabeth Dicharry	Per the EA, “The coyote population, for example, would be expected to rebound quickly after each event, as has been observed by IDFG in previous coyote removal.” As pointed out earlier, recent data on coyote numbers is dated and inconclusive. In short, there is no basis upon which to assume a quick rebound.
Guy Dicharry	On the issue of how and over what period of time coyote populations respond to different levels of exploitation, the few studies cited in the EA do not support the propositions for which they are cited
Susan Clark	There is no consideration for the possibility of a disease cycle or low prey cycle coinciding with a large “harvest” of a predator species, which would compound predator losses and slow or prevent successful recovery
Western Environmental Law Center	The EA Misleadingly Concludes That the Derby Will Have No Effect on Carnivore Populations... The EA concludes that the Derby will not affect carnivores at the population scale. The EA takes several logical leaps in reaching this unsupported conclusion.... The EA Fails to Consider Ecological Impacts Caused by the Reduction of Carnivores... Given that the derby will likely reduce wolf and other carnivore populations, the EA should have considered the serious and well-documented consequences of carnivore reductions on the ecosystem

Commenter Western Environmental Law Center	Comment Science demonstrates that apex predators such as wolves maintain ecological stability and productivity. As described above, the Derby threatens the health of these key species at a population level, both directly because it will cause additive killing and destabilization, and indirectly because it fuels intolerance towards carnivores.... The derby will weaken both carnivore populations and, by extension, ungulate populations, since carnivores ensure the survival of the fittest ungulates through culling.
Commenter Humane Society of the United States	Comment Even as they are exploited, native carnivores are integral to biological diversity and ecosystem function (e.g., Beschta and Ripple 2009, Estes et al. 2011).
Commenter Friends of Wildlife	Comment Allowing the predator derby to take place could disrupt the balance of the affected ecosystems due to a loss of predators and changed predator-prey relationships.... The EA admits that predator management is "complex and involves balancing diverse interests using biological and social considerations." EA at 13. The EA claims that species are not expected to be affected at a population scale, but fails to fully analyze this claim.
Commenter Project Coyote	Comment A large body of scientific, peer-reviewed literature establishes the ecological value of predators and the ecologically deleterious consequence of unwarranted removal of top predators.
Commenter Western Watersheds Project/ Center for Biological Diversity	Comment Many studies indicate that indiscriminate killing of wolves and coyotes may have unintended consequences ranging from adverse impacts on the social structure of wolf and coyote populations to increased predation on ungulates and livestock. Many of these studies were referenced in our previous comments.
Commenter Veronica B.	Comment Wolves, coyotes, and other predators are an essential and intricate part of our environment as a whole. The murder and extermination of these creatures not only upsets pack social dynamics, it disrupts predator/prey ecosystem structure.
Commenter Elizabeth A. Boyle	Comment Predator populations are self-regulating and that hunting these types of animals is unnecessary and should be considered blood sport. Predator species are an essential component of their ecosystems and I find it unfortunate that the attitudes that some people have regarding predators continue to be based in misinformation and superstition.
Commenter Gabrielle Lilly	Comment There is ample evidence that allowing natural predators to manage their territories is the most beneficial way to maintain a functional and flourishing ecosystem.

Commenter Susan Strauss	Comment We are completely in support of solutions to predation which are non-lethal and support a healthy environment in which predators are a valued part. We are hoping that the BLM, as other federal government agencies, can follow peer reviewed science and progressive solutions to wildlife issues.
Commenter pineconeway	Comment It needs to be remembered that coyotes predominantly eat rodents and particularly mice. It has been documented and proposed that had these same mice not been eaten (in the study,) that the geometric proportion of their population explosion would have stripped the supporting fields of all their grass seed...no feed at all for the saleable grazers.
Commenter Patricia Ericsson	Comment There are studies that show the importance of apex predators to the environment. Please see work by John Shivik (The Predator Paradox) and Cristina Eisenberg (The Carnivore Way). These studies (now books) research the importance of these predators to the health of all wild environments. Several research studies have shown how the presence of apex carnivores rebalance both animal and plant life in our environments.
Commenter A.Ballantine	Comment While there may be value to science driven limiting of certain predator species in given areas, in the name of a more humane approach to wildlife management in general I urge the BLM to develop ways to do so that don't involve killing. Also, many predator species are not yet genetically viable after centuries of persecution. Trapping and relocating animals, as well as administering birth control or tracking devices intended to advance research, can be administered so that participating hunters can enjoy the spirit of competition.
Commenter Kati Guerra	Comments There is no scientific evidence which shows any benefit to either humans or the environment from such activities. Science does show benefit from the presence of predator species in the environment.
Commenter Dale Peterson	Comment The derby will have a no affect if any at all on the wolf population in the Salmon area. The derby that was held last year is an example of the effect from such an activity.
Commenter Jake O'Rourke	Comment Coyotes and other predators are essential to the ecosystem and its balance. Their presence is crucial to the survival of every other animal, plant, and river that makes up their habitat. Shooting as many of them as possible for cash prizes is irresponsible and will have devastating and lasting consequences for the area. Killing contests threaten fragile ecosystems.
Commenter Kathleen Brewster	Comment Wolves and coyotes may be predators that prey on creatures they should not (i.e. cows) but they help the ecosystem in more ways than one. Take, for example, the decline of wolf populations in Yellowstone. Without them, the elk overran the native plants which caused erosion.

Commenter Elaine Sehnert	Comment If many predators are removed all at once then there certainly will be impacts all the way through the relevant ecosystems from prey species to vegetation to overall ecosystem health.
Commenter Joelle Porter	Comment This event would be damaging to the affected ecosystem, harmful to ecologically vital species, incompatible with scientific principles of wildlife management.
Commenter Randel Rogers	Comment the culling of animal populations in this manner is not scientific, therefore unlikely to result in improvement to wildlife populations and therefore unlikely to maintain or improve the value of BLM lands.
Commenter June H. Booth	Comment Coyote populations that are not exploited (that is hunted, trapped, or controlled by other means), form stable "extended family" social structures that naturally limit overall coyote populations through defense of territory and the suppression of breeding by subordinate female members of the family group. The importance of wolves, coyotes and other predators in maintaining order, stability, and productivity in ecosystems has been well documented.
Commenter Cheryl DeLeon	Comment It is imperative that our wildlife is protected and our ecosystems are allowed to normalize. Please review the remarkable change in Yellowstone National Park once wolves were allowed to thrive.
Commenter Susan Balthasar	Comment Predators are ecologically important. They rid us of rodents and rabbits that would otherwise multiply to the point of becoming nuisances or worse. They also encourage biodiversity and help keep the deer and elk herds from denuding areas of trees and shrubs. They are worth more alive than dead as they bring in tourists to watch them and take pictures.
Commenter M.R. MacPherson	Comment It has been scientifically established that predators, such as wolves and coyotes, provide beneficial control in native ecosystems. This control benefits not only the native system, but also us. As apex predators, wolves increase biodiversity and ecological integrity. Killing contests provide no benefit for management. Wolf and coyote populations that are not exploited (that is hunted, trapped, or controlled by other means), form stable, extended-family social structures that naturally limit overall predator populations through defense of territory and the suppression of breeding by subordinate female members of the family group.
Commenter Peggy Detmers	Comment As a wildlife biologist, I disagree with widespread predator removal, as healthy predator populations lead to healthy prey populations, as the predators remove the sick. Killing these majestic predators by any means possible is inhumane and beneath proper wildlife management practices.

Commenter Joan Milford	Comment Coyotes are a vital part of an ecosystem and should be protected. Along with wolves and other predators, coyotes help maintain the balance of nature and help preserve ecosystems. This is proven by science. They help control rodents and increase biodiversity and ecological integrity.
Commenter Rosiris Paniagua	Comment These wild animals are essential to the ecosystem which is why it is better to allow nature to take its course. We continue to wipe out and diminish populations of wild animals only to have to fight to put them on the endangered list and protect them and cost tax payers money to do this.
Commenter Sharon Reeve	Comment Knowledge of ecological systems tell you that predators structure the whole food chain and ecosystem. When you take them out the system no longer works and many harmful unintended processes take place. The importance of wolves, coyotes, and other predators in maintaining order, stability, and productivity is well-documented in peer-reviewed scientific literature. Apex predators increase biodiversity and ecological integrity.
Commenter Coral Paris	Comment I want to protest the killing of wolves in the predator hunt derby because predators are absolutely necessary to maintain the ecological balance in nature and killing them off upsets this balance resulting in increased numbers of deer and rodents which in turn result in more diseased animals and killing of plants which are important to the ecology of the land. This is all supported by hard science and many studies and should not be ignored .
Commenter Beatrice and Immanuel Wallertein	Comment Open ended "predator" hunting in environmentally unsound. Population control by government trained wildlife managers is the only way to approach this kind of problem.
Commenter Rebecca Vitale Mandich	Comment Because these magnificent predators make their home in Idaho due to their environmental adaptability to the rugged terrain means they should be scrupulously protected not wantonly slaughtered. We cannot allow these beings to be killed for the enjoyment of a few when they provide so much necessary ecosystem engineering benefits, like the trophic cascade effect. Science has proven wolves and coyotes to be marvelous stewards of our earth.
Commenter milnemw	Comment This event would be extremely damaging to the affected ecosystem, will harm threatened and sensitive species. This species attack is incompatible with modern scientific principles for public lands and wildlife management. I will appreciate your careful consideration and right action supporting your responsibility to taxpayers for stewarding public lands in the interest of survival of American wildlife and a balanced, healthy natural environment.
Commenter Andrew O'Connor	Comment Culling a predatory pack of animals, in the way that has been proposed, will weaken the pack's future ability to meet its basic needs. Culling without regard to size, weight, strength, etc, would be much more acceptable than solely taking out the largest predators. Unfortunately, human beings are not satisfied with an average sized wolf or coyote. This weakens successive

	generations in a way that your previous environmental impact study has not researched. The strongest, most successful predators would have been the ones to pass on their genetic code and teach successful hunting to the youngest members of the pack.
Commenter Jamie Lantz	<p>Comment</p> <p>Killing off predators that have social systems (eg. wolves and coyotes) actually causes more pups to be born. Altering the behavior in a pack leads to more females breeding as opposed to breeding solely from the alpha pair. Furthermore, research has also demonstrated that females begin breeding at an earlier age in exploited (eg. hunted) areas, again leading to more pups born. When coyotes are removed, there is also less intraspecific competition allowing better access to resources, which helps the pups survive. Therefore, though culling may be effective in the short term, it is not effective in the long term.</p> <p>I have also read a scientific article that illustrated how coyote removal affected prey biodiversity. When coyotes were killed off, other mesopredator populations increased and decreased the amount of prey species on the landscape and therefore altered the ecology in that area.</p>
Commenter Form Letter 2	<p>Comment</p> <p>The importance of wolves, coyotes and other predators in maintaining order, stability, and productivity in ecosystems has been well documented in peer- reviewed scientific literature. Coyotes provide myriad ecosystem services that benefit humans including their control of rodents and rabbits, which compete with domestic livestock for available forage. As apex predators wolves increase biodiversity and ecological integrity.</p>
Commenter Form Letter 3	<p>Comment</p> <p>Coyotes and other predators are essential to their ecosystems -- their presence is crucial to the survival of every other animal, plant, and river that makes up their habitat. Shooting as many of them as possible for cash prizes is irresponsible and will have devastating and lasting consequences for the area. Killing contests threaten that fragile ecosystem</p>
Commenter Form Letter 5	<p>Comment</p> <p>the BLM analysis team and any other agencies and contractors should consider the following:</p> <p>Exploring specifically the impacts of these activities on the population dynamics and social structure of the target animals—particularly wolves and coyotes;</p>
<u>Wildlife – Winter Stress/Displacement</u>	
Comments Topic Summary	
Commenters feel that the BLM failed to analyze the impacts to wildlife from displacement by derby participants during the winter months.	
BLM Summary Response	
Chapter 3 of the EA states, “In addition to the legal harvest of wildlife, participants in the event would displace individual animals as they move	

through the area. This displacement would be short lived and only over small distances. Participants in the event would follow existing travel management restrictions which protect big game, like elk and deer, from being displaced on crucial wintering areas. Because the event would occur between December and January, most migratory bird species would have moved to wintering grounds during the event and would not be affected by the event.”

Comments

<p>Commenter Humane Society of the United States</p>	<p>Comment The BLM failed to forecast into the foreseeable future how these shooters will effect wildlife and what species will be killed (and in how many numbers), displaced, or otherwise harmed from having hundreds of shooters on the landscape concentrated for three days, including how this will effect winter-stressed animals, including ungulates.</p>
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<p>Commenter Form Letter 5</p>	<p>Comment BLM analysis team and any other agencies and contractors should consider the following: Investigating the comprehensive impacts of these activities on the target and non-target species including looking at the impact of these activities (human presence, increased vehicle use, etc.) on over-wintering and food-challenged species like deer and elk</p>
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Wildlife-Wolves

Comments Topic Summary

Commenters point to the role of wolves in maintaining a health ecosystem. Commenters also identify the gray wolf as a BLM sensitive species and point to BLM Special Status Species policy and the requirement to “promote their conservation and minimize the likelihood and need for listing under the ESA.”

BLM Summary Response

As stated in .1 of BLM Manual 6521 – State Agencies it is important to note that:
 “...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal species...”
 In relation to wildlife the decision to issue the SRP focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game. While most Idaho BLM sensitive species are non-game, there are a few species that the IDFG currently allows hunters to harvest at some level, including the gray wolf.

Chapter 3 of the EA states, “Within most of the Action Area, IDFG uses a quota system for the harvest of wolves. For 2014, a total of 125 wolves were available for harvest in Wolf Management Zones that overlap the Action Area, 47 were harvested. In the Southern Idaho Wolf Management Zone there was no quota, meaning that any number of wolves could be harvested, in that zone two wolves were harvested (IDFG and Nez Perce Tribe, 2014). The number of wolves harvested during the derby cannot exceed the quotas that have been established by IDFG.”

While the gray wolf is a sensitive species, the BLM 6840 Special Status Species Management manual states for delisted species: “The BLM shall

<p>work with partners such as the FWS, NMFS, State agencies, and others, as appropriate, to monitor delisted species.” The BLM does not anticipate any noticeable impacts to gray wolf habitat within project area as a result of issuing an SRP for the predator derby. Due to the dispersed nature of the hunting involved, the requirement to adhere to current travel designations throughout the field offices involved, and the extremely large area permitted by the SRP, the BLM does not anticipate any impacts to gray wolf habitat that would conflict with BLM Special Status Species policy to minimize the likelihood and need for listing under the ESA.</p>	
<p>Comments</p>	
<p>Commenter American Wild Horse Preservation Campaign</p>	<p>Comment As a BLM---designated sensitive species, the agency must analyze how the proposed derby will impact its responsibility to sustain wolf populations on BLM lands.</p>
<p>Commenter Defenders of Wildlife</p>	<p>Comment The BLM’s Special Status Species policy directs the agency to manage sensitive species “consistent with species and habitat management objectives to promote their conservation and to minimize the likelihood and need for listing under the ESA” (BLM Manual 6840.06). This policy clearly argues against authorizing a multi-year commercial predator-killing derby on vast areas of BLM land, which would negatively affect wolves and other wildlife.</p>
<p>Commenter Humane Society of the United States</p>	<p>Comment The BLM, in a new environmental impact statement must consider how wildlife-killing derbies will affect wolves and their tremendous ecosystem services: they create trophic cascades which benefit the environment and enhance biological diversity. We call upon the BLM to re-examine how a multi-year killing contests will effect their populations, packs, and even individuals.</p>
<p>Commenter Friends of Wildlife</p>	<p>Comment The EA states that the applicant is going to work alongside the Idaho Department of Fish and Game (IDFG) to make sure that wolf quotas are not violated, but since hunters are widely dispersed and left to hunt alone, this will be all but impossible to accomplish. <i>!d.</i> at 7.</p>
<p>Commenter Western Watersheds Project/ Center for Biological Diversity</p>	<p>Comment BLM---Idaho classifies the gray wolf as a "sensitive species."11 As such, BLM is required to impose appropriate “use restrictions and management actions necessary to conserve and/or recover” the gray wolf.12 According to the BLM Special Status Species Policy, sensitive species “will be managed...to promote their conservation and to minimize the likelihood and need for listing under the ESA.”13 BLM has abdicated its responsibility to protect the gray---wolf as a BLM---sensitive species by not imposing specific conditions upon or denying the SRP... BLM provides no evidence that IDFG’s wolf hunting regulations are sufficient to either promote gray wolf conservation or “minimize the likelihood and need for listing under the</p>

	ESA” as required by BLM's Special Status Species Policy.
Commenter Justina Helta	Comment If this derby takes place, it is a possibility that the young wolf population could be devastated. It has taken many years to get the population back up above the endangered species line. The balance of nature requires wolves to be there in order to keep other wildlife in check.
Commenter Diane Vogt- O'Connor and Hugh O'Connor	Comment We need wolves in our ecosystems to keep deer wasting disease in check. We also need wolves to achieve the sort of cascading trophic ecosystem recovery that the successful establishment of wolves at Yellowstone has achieved.
Commenter Lara Edelman	Comment We have spent millions of dollars to restore the wolves in Idaho and there are only about 20 breeding pairs left. A killing contest on federal lands would only serve to defeat the whole purpose of trying to restore the ecological balance in the greater Northern Rocky Mountains.
Commenter Jackie Meyer	Comment Through the reintroduction and study of wolves on the ecosystem of Yellowstone National Park, we have learned that wolves are a net positive on the ecosystem overall, benefiting game and river health. Wolf packs are highly structured, with the killing of an alpha often wiping out the entire pack in short order. This is why random killing is highly detrimental not just to wolves, but to the ecosystem as a whole, which you are charged with protecting.
Commenter Lindi Lumens	Comment We all need to be doing everything possible to INCREASE our wolf populations to a stable level. They are important to our entire ecosystem. If you don't believe me, look into all the positive changes that have occurred in Yellowstone after the wolves were reintroduced.
Commenter Cindy Milano Guarnieri	Comments Concerns have already been raised about how these contests are harmful to wildlife, threaten public safety and conflict with other public land uses, how they fly in the face of so-called ethical hunting and support the same mentality that led to the eradication of species like wolves in the first place. It's a hatred that's clearly still alive and well in Idaho and the push for contests like this is a sad reminder that much more needs to be done to protect predators who serve a vital role in keeping our ecosystems healthy. Wolves are intelligent, social animals that have an INHERENT RIGHT to live, breed, and thrive.
Commenter Patrice Cole	Comment A healthy wolf population supports healthy wildlife habitat. Wolves are vital to the delicate balance of the forest ecosystem because they influence the feeding behavior of deer and elk, allowing vegetation to grow in the forests and along streams, which in turn supports birds, fish and beaver.

	Wolves limit the spread of diseases in deer. Wolves support habitat for game species that provide hunting tourism dollars. Wolves are genetically programmed to fear humans. Wolves may approach food resources and dogs, but typically avoid humans. Researchers report wolves cower in their traps when approached. Wolves are elusive and generally stay hidden from human view. The random killing of non-problem wolves can destabilize wolf packs and increase conflicts. It is vital that you help protect the wolves.
Commenter Barbara A. McClain	Comment When you read of the benefits that Yellowstone Park enjoyed after the reintroduction of wolves you become aware of how important each species is to the overall health of the entire ecosystem.
Commenter Nina Clausen.	Comment Wolves are very useful for the Eco-system Environment and they kill only weak and sick animals.
Commenter Lainey Johnson	Comment Wolves, one of the targeted species, just recently came off of the endangered species list. This means that they are still very vulnerable in the Idaho area.
Commenter Form Letter 1	Comment As a BLM-designated sensitive species, the agency must analyze how the proposed derby will impact its responsibility to sustain wolf populations on BLM lands
Commenter Form Letter 4	Comment Our country and the state of Idaho have invested so much to help recover these magnificent animals -- and that kind of investment shouldn't be undone.
Commenter Form Letter 6	Comment After years of persecution, wolves have only begun to repopulate their native habitats in Idaho and beyond, bringing balance back to damaged ecosystems. They remain a BLM designated sensitive species. As such, BLM must uphold its duty to sustain the species, rather than participate in its destruction.
Wildlife-Non-Target Species	
Comments Topic Summary	
Commenters feel that due to the potential number of derby participants and the variety of species classified as predators, there is a potential for impacts to non-target species including ESA listed and special status species in the action area.	
BLM Summary Response	
While occasional indirect impacts to non-target species may occur during any hunting season, impacts to non-target species as a result of issuing a SRP for a predator derby are not anticipated to be any greater than those associated with the general recreational hunting that presently occurs in the action area at a similar time of year. Killing species other than those for which derby participants possess a valid hunting license and in some cases a tag as well would be illegal.	
Comments	

Commenter Cindy Phelps	Comment While the BLM specifies that the species in the Impact Report would not be severely impacted, what about the look alike, such as pygmy rabbits.
Commenter Defenders of Wildlife	Comment A commercial predator derby covering this much public land with the potential for 500 participants annually warrants consideration of indirect impacts to non-target species, several of which are considered agency sensitive or listed as federally threatened.
Commenter Western Environmental Law Center	Comment BLM's approval of the Derby would threaten, rather than conserve, endangered species. In particular, with hundreds of contestants shooting indiscriminately at a variety of species, the Derby risks the incidental take of endangered species, in violation of ESA § 9. 16 U.S.C.A. § 1538(a)(1)(B).
Commenter Western Environmental Law Center	Comment Some participants in the Derby are likely to confuse target species with other species, especially given that time-pressure ... given the participation of young hunters who have less experience differentiating species, and given that multiple species of varying sizes and modes of movement are targets.
Commenter Humane Society of the United States	Comment Dispersing lynx could be killed by killing-contest participants who either mistake lynx for bobcats or by participants in the killing contest who are not averse to poaching wildlife. By driving more hunters into the contest area, humans will have an effect on lynx. ... We call upon the BLM to examine in its new analysis how a multi-year killing contests will effect wolverine populations.
Commenter Humane Society of the United States	Comment Holding killing contests in their range puts grizzly bears at risk and could even cause harm to hunters themselves if they inadvertently "call in" a grizzly bear instead of a coyote. Most grizzly bears are killed each year for "defense of life" reasons by hunters because they fail to carry pepper spray. We are particularly concerned about the implications to mother bears with dependent cubs.
Commenter Friends of Wildlife	Comment If the derby is allowed to proceed, non-target animals could be also be killed or displaced. EA at 14. This is of particular concern for the ESA-listed and special status species in the area. Vital habitats for special status species are found within the affected derby area as well; this includes habitat for the Canada lynx, gray <i>wolf</i> , grizzly bear, wolverine, Townsend's big-eared bat, fisher, greater sage-grouse, bald eagle, and peregrine <i>falcon</i> , to name a few. EA at 12. BLM identified at least 35 special status species in the action area, but failed to include an analysis of how each animals could be affected by the derby.

Commenter Victorian Rogue	Comment If the derby is allowed to proceed, non-target animals could be also be killed or displaced.
Commenter A.M.M. Booms	Comment Participants could misidentify their targets and kill wolverines, fishers, kit foxes or Canada lynx, a threatened species listed under the Endangered Species Act (ESA). The mass removal of weasels, jackrabbits and other "predatory" animals could also reduce the prey base for a suite of native carnivores at a time of year when food is scarce.
Commenter S.R. Miles	Comment Participants could misidentify their targets and kill wolverines, fishers, kit foxes or Canada lynx, a threatened species listed under the Endangered Species Act (ESA). The mass removal of weasels, jackrabbits and other "predatory" animals could also reduce the prey base for a suite of native carnivores at a time of year when food is scarce.
Commenter Form Letter 1	Comment Further, with up to 500 participants "hunting for as many predators as they are able to harvest within 3 days," the derby is also likely to put other sensitive species at risk. Participants could accidentally kill or injure wild horses, as well as misidentify their targets and kill wolverines, fishers, kit foxes or Canada lynx, a threatened species listed under the Endangered Species Act (ESA).
Wildlife – Consultation	
Comments Topic Summary	
Commenters feel that there is the potential for impacts to ESA listed species as a result of the proposed action and that this requires consultation with the U.S. Fish and Wildlife Service.	
BLM Summary Response	
In September of 2014 the BLM prepared an Biological Assessment to discuss the potential impacts of the proposed action action on federally listed, proposed, and candidate species; designated critical habitat (DCH); and Essential Fish Habitat (EFH). It was determined that there would be “No Effect” to ESA listed fishes, Designated Critical Habitat (DCH) and Essential Fish Habitat. It was also determined that there would be “No Effect” to ESA listed, proposed, and candidate terrestrial species with the exception of the greater sage-grouse which the proposed action was determined to “Not Likely to Adversely Effect.” The IDFG has been consulted with and they agree that habitat for greater sage-grouse would be maintained with this proposal. Impacts to sage-grouse would be limited to potential flushing of birds should a hunter come into close proximity to the birds.	
Comments	
Commenter Defenders of Wildlife	Comment BLM must also consult with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act on potential impacts of the proposed derby upon non- target, federally listed species such as Canada Lynx.
Commenter Western	Comment Given the threats to ESA-listed species (such as lynx and wolverine) posed by the Derby, the BLM must consult with the Fish

Environmental Law Center	and Wildlife Service in order to “insure that [the Derby] is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species.” 16 U.S.C. § 1536(a)(2).	
Commenter Friends of Wildlife	Comment The proposed action will affected listed species and critical habitat, and thus, the BLM must conduct a Section 7 consultation regarding the impacts before issuing a permit. The contents of this consultations should be made available for public comment and review.	
Commenter Form Letter 5	Comment the BLM analysis team and any other agencies and contractors should consider the following: Consulting with the US Fish and Wildlife on the potential for this action and associated activities to impact federally listed species or their supporting habitats;	
<u>Wildlife-Other</u>		
Commenter American Wild Horse Preservation Campaign	Comment There can be no ecological balance – either in wild horse habitat areas or elsewhere – in the absence of predators, which play a key role in maintaining healthy and thriving ecosystems. Additionally, the area proposed for the predator derby includes the Challis Herd Management Area, and therefore could negatively impact the wild horses living there.	Response Impacts to wild horses in the Challis HMA are expected to be similar to those of non-target wildlife as a result of issuing a SRP for a predator derby. These impacts are expected to be the displacement of individual animals as derby participants move throughout the project area. These displacements are expected to be short lived and over a very small area given the dispersed nature of the hunting that will occur and the vast amount of land authorized for the predator hunt in the SRP. The requirement to adhere to current travel designations would further reduce potential impacts to wild horses within the Challis HMA.
Commenter Elisabeth Dicharry	Comment The EA states, “Given the timing of the Proposed Action there will be very few migratory bird species in the area, since most will have migrated south for the winter months.” That statement is directly contradicted by the BLM’s own publication on birds	Response The <i>Affected Environment</i> for wildlife on page 14 of the EA states, “Further consideration is given to avian species afforded special management emphasis under the Migratory Bird Treaty Act (MBTA). As of 2010, under a signed Memorandum of Understanding (MOU) with the USFWS,

	<p>in Idaho. In fact, there are many species of birds that winter in Idaho.</p>	<p>the BLM has a responsibility to “as practical, protect, restore, and conserve habitat of migratory birds, addressing the responsibilities in Executive Order 13186”. Given the timing of the Proposed Action there would be very few migratory birds species in the area, since most would have migrated south for the winter months.” While there many species of birds that do winter in Idaho, the majority of “avian species afforded special management emphasis under the Migratory Bird Treaty Act (MBTA)” are expected to have migrated south for the winter months during the time of the SRP. Furthermore, no migratory bird habitat is expected to be impacted as a result of issuing a SRP for the predator hunt.</p>
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WSA

Comments Topic Summary

Commenters feel that issuing an SRP for the predator derby would result in a chronic, repeated short-term use that does not meet this definition of “temporary.” Commenters also feel that issuing the SRP would create a demand for uses that would be incompatible with wilderness management and therefore would not meet the definition of temporary.(BLM Manual 6330). One commenter pointed to the section of BLM Manual 6330 that states, “Activities that require authorization under a Special Recreation Permit (SRP) will be allowed only if the use and related facilities satisfy the non-impairment criteria (and therefore do not involve a use of the WSA that would be incompatible with wilderness designation). Examples of uses that may be authorized include river trip outfitters, hunting or fishing guides, group backpack trips, and providers of pack animals and saddle horses.”

BLM Summary Response

Chapter 3 of the EA states, “There are no designated Wilderness areas within the action area, however there are 17 WSAs, located in the project area. Typical activities that occur within the project area’s WSAs include: hiking, hunting, camping, fishing, wildlife viewing, horseback riding, and ranching is an allowable activity in some. Federal regulations (43 CFR 6302.20) prohibit competitive events like the proposed derby within designated wilderness. Thus, if Congress designates a wilderness area within the project area, hunting derbies would not be permitted within the boundaries of the wilderness.

The use of WSAs for the proposed competitive hunting event meets the non-impairment standard because the action is temporary, short term, and would not create any surface disturbance. BLM Manual 6330 defines temporary as *the use or facility is needed for a defined time period to respond to a temporary need, and would be terminated and removed prior to or upon wilderness designation. A chronic, repeated short-term use does not meet this definition of "temporary." Uses, activities, or facilities that create a demand for uses that would be incompatible with wilderness management also do not meet the definition of temporary.*

Recreational hunting is an allowable use of the WSAs within the action area and the hunting associated with the derby is not considered a chronic or repeated short term use. This is due to the dispersed nature of hunting, topography, and the size of the units. Any increase in visitation to the WSA's above the existing recreational hunting use as a result of the proposed action would be insignificant. Therefore, the proposed action is not considered a chronic, repeated short-term use. Although competitive events are prohibited from designated wilderness, design features of the proposed action state that the event would be excluded from these units upon future designation, thus removing the demand that may be perceived as incompatible with wilderness management.

In regards to the comment concerning SRP authorizations within WSA's the BLM again feels that the design features of the proposed action, specifically that the event would be excluded from any wilderness areas designated in the future with the project area eliminates any concern that issuing the SRP would not satisfy the non-impairment criteria.

Comments

Comments	
Commenter American Wild Horse Preservation Campaign	Comment A chronic, recurring short-term use such as this does not meet the definition of "temporary" under the non-impairment standard for managing wilderness quality lands. Further, the activity is inconsistent with the BLM's mandate to manage Wilderness Study Areas "to preserve wilderness characteristics so as not to impair [their] suitability for designation by Congress as wilderness."
Commenter Guy Dicharry	Comment Granting an SRP for the IFW contest will create a demand for more contests using the WSAs. Merely creating a demand for more wildlife killing contests on WSAs would be incompatible with wilderness management for two reasons: (1) competitive events are not allowed on wilderness areas; and (2) multiple contests are not temporary within the meaning of Manual 6330. The standard is whether the use (IFW contest) will create a demand for uses (more contests) incompatible with wilderness management. "A chronic, repeated short-term use does not meet this definition of "temporary. Uses, activities, or facilities that create a demand for uses that would be incompatible with wilderness management also do not meet the definition of temporary." (emphasis added) Source: BLM Manual 6330 §1.6(C)(1)(a).
Commenter Chris Barns	Comment However, the EA incorrectly surmises that since the permit would stipulate that the event would not be allowed in any area if designated as wilderness, then this "remov[es] the demand that may be perceived as incompatible with

	<p>wilderness management.” The EA is completely backwards – by permitting an activity that is illegal in wilderness, the BLM is increasing the likelihood that the area(s) will not be designated so that activity will be allowed to continue. This, in fact, has been the case found in other WSAs where the BLM has inappropriately approved SRPs for activities that would be illegal in wilderness....</p> <p>But regardless of the theoretical impact to the natural environment from any hypothetical activity, Manual 6330, Section 1.6.D.6.m (page 1-31) plainly states: “Activities that require authorization under a Special Recreation Permit (SRP) will be allowed only if [they]... do not involve a use of the WSA that would be incompatible with wilderness designation.” As the EA correctly states, the proposed activity would be incompatible with wilderness designation. Therefore, to issue an SRP under this EA is a violation of BLM policy.</p>
Commenter Defenders of Wildlife	<p>Comment</p> <p>Chronic, repeated uses, such as this commercial predator-hunting derby, do not meet the definition of “temporary” under the non-impairment standard for managing wilderness-quality lands. The BLM should reject intrusive, unrestrained uses such as commercial predator-killing derbies in WSAs to protect wilderness values</p>
Commenter Humane Society of the United States	<p>Comment</p> <p>The BLM has failed to examine how contest hunts will degrade the lands, particularly special lands such as Areas of Critical Environmental Concern (ACECs) and Wilderness Study Areas (WSAs) from hundreds of contest shooters traveling on these lands, bullet strikes, and noise from motors and shooting.</p>
Commenter Project Coyote	<p>Comment</p> <p>The proposed derbies will take place on designated “Wilderness Study Areas” (WSAs) – lands under consideration for full Wilderness designation. Lands classified as “wilderness” are “an area where the earth and its community of life are untrammled by man.” Predator derbies represent serious trammeling by man.</p>
Commenter Western Watershed Project/ Center for Biological Diversity	<p>Comment</p> <p>FLPMA requires BLM to avoid “unnecessary and undue degradation” of public lands and Wilderness Study Areas (“WSA”), 17 of which would be impacted by the proposed action, and to protect Areas of Critical Environmental Concern (“ACEC”), 12 of which would be impacted.² BLM also must avoid anything that would “impair” the characteristics of WSAs.</p>
Commenter Form Letter 1	<p>Comment</p> <p>A chronic, recurring short-term use such as this does not meet the definition of "temporary" under the non-impairment standard for managing wilderness-quality lands. Further, the activity is inconsistent with the BLM’s mandate to manage Wilderness Study Areas "to preserve wilderness characteristics so as not to impair [their]</p>

	suitability...for designation by Congress as wilderness."
Idaho Fish and Game	
Comments Topic Summary	
Commenters feel that the statement by Idaho Fish and Game not to support predator hunting contests is equivalent to opposition to predator hunting contests and issuing a SRP for the predator derby would conflict with Idaho Fish and Game policy.	
BLM Summary Response	
<p>As stated in .1 of BLM Manual 6521 – State Agencies it is important to note that:</p> <p>“...Bureau policy is based upon the premise that management of fish and wildlife on the public lands and waters should be a joint effort between BLM and State wildlife agencies, with BLM managing the habitat and the States managing the resident animal species...”</p> <p>In relation to wildlife, the decision to authorize the SRP focuses on the effects to the habitat and not the actual harvest which is a decision that lies with the Idaho Department of Fish and Game. While Idaho Fish and Game may not support predator derbies, all animals harvested as a result of the predator derby would be subject to Idaho Fish and Game regulations. “IDFG’s management goal is for reduction, not elimination of predators. Predator control often involves removal of animals, but the intent is not to completely eliminate predators. The long-term goal is to reduce predator numbers enough to allow increased game numbers, increased harvest opportunities, and to maintain viable populations of all wildlife, including predators” (IDFG, 2012). Further concerns regarding the actual harvest of predators or other game species or the policies of Idaho Fish and Game should be directed towards Idaho Fish and Game for comment or clarification.</p>	
Comments	
Commenter Guy Dicharry	<p>Comment</p> <p>The Department is clear that predator killing contests are not a wildlife management method. "However, the Department will not support any contests or similar activities involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public. The Department opposes use of bounties as a predator control measure."</p>
Commenter Project Coyote	<p>Comment</p> <p>And while the proposed activity may not violate existing wildlife laws, it does violate a standing policy of the Idaho Fish and Game Department (IFGD)." the Department will not support any contests or similar activities</p>

	involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public. The Department opposes use of bounties as a predator control measure."
Commenter Western Watershed Project/ Center for Biological Diversity	Comment SRP approval would directly conflict with the policies of IDFG, which "will not support any contests or similar activities involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public."
Commenter Christine and Robert Gertschen	Comment Idaho Fish and Game code: "Fish and Game will not support any contests or similar activities involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public. " Idahoans should be celebrating and working to maintain the diversity of wildlife that we are blessed with here. We are stewards of our natural gifts – stewards of wildlife and wildlands. Carcass counting for sport and profit is the antithesis of stewardship.
Commenter Don Oak	Comment "Fish and Game will not support any contests or similar activities involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public." -- Predator Management Policy, Idaho Department of Fish and Game The Special Recreation Permit for predator killing contest on BLM lands directly conflicts with IDFG policy referenced above.
Commenter Form Letter 6	Comment Indeed, the Idaho Department of Fish and Game (IDFG) specifically decries such activities: "Fish and Game will not support any contests or similar activities involving the taking of predators which may portray hunting in an unethical fashion, devalue the predator, and which may be offensive to the general public." See
Recreation- User Conflicts	
Comments Topic Summary	
Commenters feel that as a result of issuing a SRP for the predator derby there will be user conflicts and it would create a hazard to members of the public engaged in other recreational uses of public lands within the project area.	

BLM Summary Response

The recreation section in Chapter 3 of the EA states, "Some user-created conflicts could occur if competitors and others are concentrated in one area. However, this is unlikely as hunting is generally a dispersed activity because hunters desire to be isolated in hopes of viewing more game. Winter recreation use in the action area is low, however, some use does occur by snowmobilers, cross country skiers, and hunters. Non-winter based activities such as mountain biking and hiking does occur in lower elevation areas depending on snow cover and depth. Conflicts with other recreationists are unlikely given the vastness of the area and the low amount of recreation use during this time of year."

Comments

<p>Commenter Guy Dicharry</p>	<p>Comment The EA assumes, incorrectly, that there will be uniform dispersal of contestants over all lands managed by BLM.... If BLM lands are made available, it is likely that they will be seen as preferable to other public lands already open to contestants. That situation will lead to a concentration of contestants on BLM lands.... Past winners of other wildlife killing contests advise changing stands every 12 to 15 minutes to increase the likelihood of winning. Changing stands frequently also increases the likelihood of user-created conflicts.</p>
<p>Commenter Western Environmental Law Center</p>	<p>Comment The risk is especially high because contestants will be shooting a variety of species of differing sizes and different modes and speeds of travel, including animals that fly in the air (starlings); animals that stay very close to the ground (e.g., weasels); and animals at mid-level (e.g. wolves and coyotes).The event will involve children, who are both vulnerable to injury and a danger to others because of their inexperience.</p>
<p>Commenter Project Coyote</p>	<p>Companion animals and people enjoying BLM land will be at heightened risk of injury or even death, especially given the aggressive nature of the derby.</p>
<p>Commenter Project Coyote</p>	<p>Comment It has been argued that the BLM is bound by policy to offer "outdoor recreation" on its lands and that hunting is a form of outdoor recreation enjoyed by many Americans. We do not disagree that the BLM has an obligation to provide for a diversity of outdoor recreational activities on its lands. Denying this permit would not preclude anyone, including potential derby registrants, from legally hunting on BLM lands outside the context of the predator hunt derby. But denying the permit would enhance the enjoyment and safety of those engaged in other forms of recreational activities on the days when the hunting derby would take place.</p>

Commenter Scott Beckstead	Comment Allowing a group of heavily-armed contestants to fan out across the landscape to shoot anything that moves creates a terrible safety risk for the rest of the public, who look to our federally-owned public lands as a place to enjoy the beauty of the natural world.
Commenter Form Letter 2	Comment Wildlife killing contests put non-target animals, companion animals, and people at risk. Domestic dogs are sometimes mistaken for coyotes and wolves.
Commenter Kaylee Dolen	Comment The proposed derby is in direct opposition to the magic of the West and its serene nature, healthy ecosystems, and undisturbed recreation. If the BLM allows the derby to take place, I fear that the serenity of the 3 million affected acres will be disturbed, recreation will be impacted, and most importantly, ecosystems will become more fragile...I am also concerned that the BLM is largely ignoring the opinions of non-hunting recreationists, environmental groups, local native peoples, and other citizens who have voiced their opinions against the derby.
Commenter Michael Siegle, Ph.D.	Comment Not only will such a hunt disrupt an ecological balance, allowing other predators to move in and take over open spots, but it is dangerous! Allowing children as young as 10 years old to enter makes the event even more dangerous. Too many inexperienced people will be out there trying to shoot anything on the ground or in trees that moves. Pets are at risk. Other people are at risk, especially inexperienced or infrequent hunters. Someone is going to be severely or fatally injured!
Commenter Form Letter 6	Comment An event where hundreds of armed people enter public lands motivated to kill as many animals as possible in just three days presents a significant public safety threat. Indeed, the dates of the event proposed for 2015, during the New Year's holiday period, increase the likelihood of dangerous situations and increase the odds of conflict with recreational users of public lands, including hikers, skiers, snowshoers, and others frequenting the area during the holiday vacation season.
Environmental Effects of Lead Ammunition	
Comments Topic Summary	
Commenters feel that as a result of issuing the SRP for the predator derby there will be a large amount of lead ammunition introduced into the environment and that the BLM should analyze the impacts from this.	

BLM Summary Response	
The number and distribution of derby participants is not expected to be noticeably greater than the number and distribution of recreational hunters in the project area at a similar time of year. With the extremely large area permitted for the SRP and the dispersed nature of the hunting involved, it is anticipated that there would be no impacts from the use of lead ammunition beyond those associated with the recreational hunting and target shooting that is an acceptable use of public lands.	
Comments	
Commenter Humane Society of the United States	Comment The BLM failed to examine how toxic lead ammunition sprayed across three million acres of federal public lands by people who use animals as live targets will affect the environment including aquatic ecosystems, non-target species some of whom are federally protected, including raptors such as eagles.
Commenter Project Coyote	Comment Lead in bullets used as ammunition is an environmental pollutant deadly to many species not intended as targets of the contest. Such animals may ingest the lead by eating non-retrieved animals that eventually die. This could result in long-term degradation of non-targeted species populations.
LUP Conformance	
Comments Topic Summary	
The commenter feels that the proposed SRP would not be in conformance with the Challis RMP or the Medicine Lodge RMP due to restrictions on SRP's and human disturbance in big game winter ranges during the crucial winter range period. The commenter also feels that the proposed SPR would not conform to the requirement from the Challis RMP for the BLM to "eliminate the need for the listing of sensitive species."	
BLM Summary Response	
The Challis RMP states , "In the following wildlife habitat areas, unless NEPA analysis and consultation with the IDFG determine that restrictions on a permitted activity are not necessary, BLM permitted activities (other than permitted livestock use, unless restricted elsewhere) would be (1) restricted to prevent disturbance during the specified crucial periods, and (2) designed to eliminate adverse effects (in consultation with the IDFG and other interested publics):... Big Game Winter Ranges 11/15-4/30" (Challis RMP pg. 74) The BLM has undergone extensive consultation with Idaho Fish and Game and other interested publics in the development of the proposed action. Chapter 5 of the EA outlines the consultation and coordination that the BLM has undergone to develop the proposed action. During consultations with Idaho Fish and Game, concerns about big game winter range were never raised as an issue. As a result big game winter range was not further analyzed within the EA. It has been	

determined restrictions to the proposed action beyond those identified in the proposed action as design features/stipulations are not necessary to prevent disturbance during the specified crucial period for big game winter range of 11/15-4/30. The requirement to adhere to current travel designations throughout the project area, many of which identify seasonal closures to protect big game winter ranges, further serves to prevent any disturbance to big game winter range which could result from issuing a SRP for a predator derby.

The Medicine Lodge RMP states, “ Seasonal restrictions will continue to be applied where they are needed to mitigate the impacts of human activities on important seasonal wildlife habitat....Big Game Winter Range 12/01-4/30.” (Medicine Lodge RMP pg. 28) The requirement to adhere to current travel designations throughout the project area, many of which identify seasonal closures to protect big game winter ranges serves to mitigate any impacts from human activities in big game winter range which could result from the issuance of a SRP for a predator derby.

In response to the comment concerning the Challis RMP’s requirement that the BLM “eliminate the need for listing sensitive species” specifically the gray wolf, please see the BLM’s summary response in the section titled Wildlife-Wolves in this appendix on page 49

Comments

Commenter	Comment
Western Watersheds Project/ Center for Biological Diversity	The SRP would not conform to either the Challis Resource Management Plan (“Challis RMP”) or the Medicine Lodge Resource Management Plan (“Medicine Lodge RMP”). The Challis RMP requires restrictions on SRPs to eliminate adverse effects on winter range from 11/15 to 4/30 each year. ¹⁹ The Medicine Lodge RMP also restricts human disturbance in Big Game Winter Ranges from 11/15 to 4/30. ²⁰ The EA’s discussion of “Conformance with the Applicable Land Use Plans” is limited to conclusory statements regarding provision of recreational opportunities. ²¹ Though the proposed use would occur during the crucial winter range period, BLM did not impose restrictions to protect BLM---Idaho winter ranges. ²² The EA mentions neither conflicts with mandatory RMP winter range protections nor requisite consultations with IDFG and other interested publics about what restrictions on the proposed use would “eliminate adverse effects” on winter range.

Commenter Western Watersheds Project/ Center for Biological Diversity	Comment The SRP would also not conform to the Challis RMP’s requirement that BLM “eliminate the need for listing of sensitive species...by increasing the number or size of populations or by removing threats to species and their habitats.” ²⁶ As noted above, BLM---Idaho classifies the gray wolf, <i>Canis lupus</i> , as a "sensitive species."	
Other		
Commenter Humane Society of the United States	Comment The BLM has failed to adequately examine how contest hunts will harm cultural resources because it also failed to disclose what those resources are in its EA, including those that may involve Native American religious artifact.	Response As stated in Table 1 <i>Resources Considered in the Impact Analysis</i> on page 10 of the EA, “The proposed action would cause no measurable impact to the cultural resources present in the action area because the intensity of hunter presence would likely not exceed that occurring during a typical non-derby hunting season. Rules and regulations, such as obeying travel management objectives and designations will avoid disturbances to known cultural resources. “
Commenter Humane Society of the United States	Comment Failure to even include a bibliography for the few cryptic references found in the BLM’s EA such as “IDGF 2012” – unreferenced citations are completely meaningless to the public and to the decision maker and are therefore inadequate	Response The bibliography was inadvertently omitted from the draft EA released for public comment. This section was provided to commenters who requested it and the comment period extended accordingly to allow the public time to comment.
Commenter Humane Society of the United States	Comment The EA states that the project area contains twelve Areas of Critical Environmental Concern (ACEC) but that the contest hunts will result in no “measurable effect” in the ACECs, without disclosing any details or data that resulted in that conclusion (EA at 9).	Response The Resources Considered in the Impact Analysis Table on page 10 of the EA states, “ There are 12 ACECs located in the project area. Rules and regulations, such as obeying travel management objectives and designations would prevent any measurable impact to the desired management objectives of the ACECs.” It is expected that any potential impacts to the ACECs in the project area due to the SRP

		would be the result of motorized use. The requirement to adhere to current travel designations in the project area including ACECs would prevent impacts to ACECs in the project area.
Commenter	Comment	Response