

Finding of No Significant Impact

For the

Predator Hunt Derby

DOI-BLM-ID-I000-2014-0002-EA

INTRODUCTION AND BACKGROUND

On June 27, 2014, Idaho for Wildlife submitted an application for a predator derby to be held on January 2-4, 2015 in Salmon, Idaho. Idaho for Wildlife applied to 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. All rules and hunting regulations would be followed and adhered to by all participants.

In June of 2014, the BLM created an inter-disciplinary team (IDT) comprised of recreation, forestry, wilderness, wildlife, range, fisheries, weeds, archaeology, and lands resource specialists to consider impacts that could occur as a result of authorizing the application received for a predator hunt derby.

Following internal and external scoping of the issues to consider for analysis, the BLM completed the Predator Hunt Derby Environmental Assessment (EA) (DOI-BLM-ID-I000-2014-002-EA) which analyzes and discloses environmental impacts of implementing the proposed action and the no action alternative on the BLM administered lands in the Salmon, Challis, and Upper Snake Field Offices.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

A FONSI is a NEPA document prepared by a Federal agency, in this case the Bureau of Land Management (BLM), that briefly presents the reasons why an action will not have a significant effect on the human environment and for which an environmental impact statement (EIS) will not be prepared. A significant impact, as described in NEPA documents, would be of sufficient context and intensity that an EIS would be required (40 CFR 1508.27). The FONSI should include the EA or a summary of it. If the EA is included, the FONSI need not repeat any of the discussion in the EA but may incorporate it by reference (40 CFR 1508.14).

Context: This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity: This refers to the severity of impact. Responsible officials must bear in mind that

more than one agency may make decisions about partial aspects of a major action

I have reviewed the EA (DOI-BLM-ID-I000-2014-002-EA), which is incorporated by reference here in its entirety, including the explanation and resolution of any potentially significant environmental impacts, and reviewed and thoroughly considered public comments regarding the EA. I have also reviewed the ten Intensity Factors for significance listed in 40 CFR 1508.27 and have determined that the proposed action (Alternative A), along with the design features and terms and conditions described, does not constitute a major federal action affecting the quality of the human environment or causing unnecessary or undue degradation of the natural environment. Therefore, an Environmental Impact Statement has not been prepared.

RATIONALE

The bold and italicized text are repeated from 40 CFR 1508.27 for completeness and an explanation follows for relevance to the decision.

(a) Context.

For context, significance varies with the setting of the proposed action. For instance, for a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. For this proposed action, the effects are confined to the approximately 3,100,000 acre area within the BLM Idaho Falls District described in the EA, involving public, private, and state lands, and I find that the project's affected region is localized and the environmental effects resulting from the activities proposed are relevant to people recreating and living in the area. There would be no significant societal or regional impacts.

(b) Intensity.

When evaluating the intensity, or the severity, of the impacts to resources that would occur by implementing Alternative A, I am required by CEQ (40 CFR 1508.27 (b)) to consider the following 10 elements:

(1) Impacts that may be both beneficial and/or adverse.

The analysis documented in DOI-BLM-ID-I000-2014-0002-EA did not identify any individually significant short- or long-term impacts. *The Affected Environment And Environmental Consequences* section of the EA (Chapter 3 pg. 9) describes the direct and indirect impacts of the proposed action and no action alternative. The proposed action would authorize a 3-consecutive day competitive predator hunt event on public lands between the dates of December 15 and January 15. Subject to annual performance review and reporting, the permit would be valid for five consecutive years.

Wildlife species would be harvested as part of the proposed action. Additionally, up to 500 participants in the event would displace individual animals as they move through the area. This displacement would be short term, occurring over three days each year the derby is held (EA Chapter 3 pg. 15). As a result of implementing the proposed action, some businesses would benefit from the event and receive a short term increase in sales from out of town participants, other businesses may be adversely impacted due to potential boycotting of the area. Impacts to

local economic development, employment, population, property values, or public services and community facilities would be negligible as any adverse impacts of a boycott resulting from issuing the SRP are likely to be spread statewide. (EA Chapter 3 pg.20). Social impacts could occur for members of the public supporting and/or engaging in these types of competitive hunting activities and those protesting or boycotting these activities. These impacts may include personal satisfaction or dissatisfaction found when participating in a competitive event, or knowing that such an event is occurring , depending on personal values. (EA Chapter 3 pg. 20).

(2) The degree to which the proposed action affects public health or safety.

The environmental analysis documented no significant effects on public health and safety from any of the actions described in the proposed action. The Recreation section of the Affected Environment on page 21 in the EA describes the potential for conflicts between participants in the predator derby and other recreationists in the area. Conflicts are expected to be minimal due to the event taking place early in January, and the dispersal of participants across approximately 3,100,000 acres of BLM-administered public land. Although hunting would result in a greater number of hunters than would usually be present absent a derby, because of the seasonal conditions and dispersal of hunters over the permit area, conflicts are not expected to be any greater than usual during recreational hunting this time of year.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The environmental analysis documented no major effects on unique geographic features of the area. There are 17 Wilderness Study Areas (WSA) and 12 Areas of Critical Environmental Concern (ACEC) within the project area. The areas are expected to receive use from participants in the derby, however it is not expected to be greater than the normal recreational use these areas receive at this time of year. WSA's and ACEC's located at higher elevations are not expected to receive any use due to inaccessibility during this time of year.(EA Chapter 3 pg. 23)

(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

Under (40 CFR 1508.27(b)(4)) it states, "You must consider the degree to which the effects are likely to be highly controversial. Controversy in this context means disagreement about the nature of the effects, not expressions of opposition to the proposed action or preference among the alternatives. There would always be some disagreement about the nature of the effects for land management actions, and the decision-maker must exercise some judgment in evaluating the degree to which the effects are likely to be highly controversial. Substantial dispute within the scientific community about the effects of the proposed action would indicate that the effects are likely to be highly controversial."

Effects on the quality of the human environment from authorizing the special recreation permit are not likely to be highly controversial from a scientific perspective. The action of predator hunting is one that evokes strong emotional responses in many people. However, predator hunting is a permissible use of public land and has occurred historically in the project area.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The environmental analysis did not identify any effects on the human environment which are highly uncertain or involve unique or unknown risks which would result from authorizing the special recreation permit. Predator hunting occurs in the project area currently and has occurred in the project area and in the region historically.

(6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

The proposed action does not set precedent for future actions with significant effects or represent a decision in principle about a future consideration. While authorizing this special recreation permit represents the first time an SRP would be issued for a predator derby on BLM managed lands, it does not establish a precedent for future actions with significant effects. The selected alternative was considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect, and cumulative effects of the selected alternative is described in Chapters 3 and 4 of the EA. Implementation of this decision would not trigger other actions, nor would it represent a decision in principle about future consideration. Future applications for additional predator derbies outside this special recreation permit would require their own specific analysis.

(7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

The EA documents the connected and cumulative impacts with the scope of the analysis area. The analysis did not identify any known significant cumulative or secondary effects. The cumulative effects of past, present, and reasonably foreseeable actions are considered and disclosed in the *Cumulative Effects Of Alternatives* section described in Chapter 4 of the EA on page 26. No individually or cumulatively significant impacts were identified in the EA in combination with all of these activities

(8) *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed, or eligible for listing, in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

The proposed action would not adversely affect districts, sites, highways, structures, or objects in or eligible for listing in the National Register of Historic Places. The Resources Considered in the Impact Analysis Table on page 10 of the EA noted that Cultural Resources were present but would not be impacted because the nature of the action and the requirement for all motorized travel to be consistent with current travel designations. The proposed action would not cause loss or destruction of significant scientific, cultural, or historic resources.

(9) *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.*

A Biological Assessment was prepared for the implementation of the proposed action and it was determined that authorizing the special recreation permit would have no effect on endangered or threatened species or their habitat with the exception of greater sage-grouse which the proposed action was determined 'May Affect but is unlikely to Adversely Affect'. 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 by hunters.

(10) *Whether the action threatens a violation of Federal, state, or local law or requirements imposed for the protection of the environment.*

The environmental analysis documents the proposed action is consistent with Federal, State, and local laws or requirements imposed for the protection of the environment. Federal, state, local, and tribal interests were given the opportunity to participate in the environmental analysis process. A meeting was held with tribal members to discuss the proposal and obtain their comments. Letters providing notice on the opportunity to comment on the environmental analysis were sent to interested members of the public and Native American tribes, and posted to the BLM ePlanning web site. In addition, the project is consistent with applicable land management plans, policies, and programs (EA Chapter 1 pg. 4). All hunting associated with the special recreation permit would be subject to Idaho Fish and Game regulations.

DETERMINATION

Based on the information contained in the EA and my consideration of criteria for significance (40 CFR 1508.27). It is my determination that: 1) the implementation of the proposed action would not have significant environmental impacts; 2) the proposed action is in conformance with the applicable Land Use Plans listed on page 4 of the EA; and 3) the proposed action does not constitute a major federal action having significant effects on the human environment. Therefore, an Environmental Impact Statement is not necessary.

/s/ Joe Kraayenbrink
Idaho Falls District Manager

Date: November 13, 2014