Nevada Department of Wildlife Predator Management Plan Fiscal Year 2025

1 July 2024 to 30 June 2025



STATE OF NEVADA

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Introduction

NDOW maintains a philosophy that predator management is a tool to be applied deliberately and strategically. Predator management may include lethal removal of predators or corvids, nonlethal management of predator or corvid populations, habitat management to promote more robust prey populations which are better able to sustain predation, monitoring and modeling select predator populations, managing for healthy predator populations, and public education, although not all of these aspects are currently eligible for funding through predator fee dollars. NDOW intends to use predator management on a case-by-case basis, with clear goals, and based on an objective scientific analysis of available data. To be effective, predator management should be applied with proper intensity and at a focused scale. Equally important, when possible projects should be monitored to determine whether desired results are achieved. This approach is supported by the scientific literature on predation management. NDOW is committed to using all available tools and the most up-to-date science, including strategic use of predator management, to preserve our wildlife heritage for the long term. NDOW works with area biologists and monitors harvest data to ensure localized removal of predators does not result in negative biological consequences on a region or statewide level.

NDOW is a state agency that must balance the biological needs of wildlife, statutory mandates, and social desires of the public. In the 2023 legislative session, Assembly Bill 70 was adopted which in part amended NRS 502.253 to read: a fee of \$3 must be charged for processing each application for a game tag, the revenue from which must be accounted for separately, deposited with the State Treasurer for credit to the Wildlife Account in the State General Fund and used by the Department, at the direction of the applicant, for costs related to: (a) Developing and implementing an annual program for the lethal removal of predatory wildlife; or (b) Developing and implementing an annual program for the improvement of wildlife habitat and research or management activities beneficial to nonpredatory game species. An application season has not passed since Assembly Bill took effect; therefore this plan does not reflect applicant direction.

Budget Summary

Fiscal year 2023 predator fee revenues totaled \$944,410. Proposed predator projects for fiscal year 2025 include \$784,000 for lethal work, these funds include fiscal year 2023 revenues and previous fiscal years surpluses.

Map Note

Maps for each project may be found in the last page of this document.

Table of Contents

TYPES OF PROJECTS6
Project 21: Greater Sage-Grouse Protection (Common Raven Removal)
Previous Budgets and Expenditures
Project 22-01: Mountain Lion Removal to Protect California Bighorn Sheep (Recommended for Discontinuation)
Previous Budgets and Expenditures
Project 22-074: Monitor Rocky Mountain Bighorn Sheep for Mountain Lion Predation 12
Previous Budgets and Expenditures
Project 37: Big Game Protection-Mountain Lions
Previous Budgets and Expenditures
Project 38: Big Game Protection-Coyotes
Previous Budgets and Expenditures
Project 40: Coyote and Mountain Lion Removal to Complement Multi-faceted Management in Eureka County
Previous Budgets and Expenditures
Project 41: Increasing Understanding of Common Raven Densities and Space Use in Nevada
Previous Budgets and Expenditures
Project 42: Assessing Mountain Lion Harvest in Nevada (Recommended for Discontinuation)
Previous Budgets and Expenditures
Project 43: Mesopredator removal to protect waterfowl, turkeys, and pheasants on Wildlife Management Areas
Previous Budgets and Expenditures
Project 44: Lethal Removal and Monitoring of Mountain Lions in Area 24

Previous Budgets and Expenditures	28
Project 45: Passive Survey Estimate of Black Bears in Nevada	29
Previous Budgets and Expenditures	30
Project 46: Investigating Potential Limiting Factors Impacting Mule Deer in No.	
Previous Budgets and Expenditures	32
Project 47: Mule Deer Enhancement Program Mule Deer Protection and Assessment	33
Previous Budgets and Expenditures	34
Literature Cited	36

TYPES OF PROJECTS

Below are the three categories of projects in the predator management plan. Some projects have aspects of multiple types within a single activity or action. The project types are listed throughout this document.

- 1. **Implementation**: The primary objective is to implement management of predators through lethal or non-lethal means. NDOW will collaborate with USDA Wildlife Services and private contractors to conduct lethal and non-lethal management of predators. Identifying and monitoring a response variable is not a primary objective for implementation.
- 2. **Experimental Management**: The primary objectives are management of predators through lethal or non-lethal means and to learn the effects of a novel management technique. NDOW will collaborate with USDA Wildlife Services, private contractors, and other wildlife professionals to conduct lethal or non-lethal management of predators and will put forethought into project design. Response variables will be identified and data will be collected to determine project effectiveness. Expected outcomes will include project effectiveness, agency reports, and possible peer-reviewed publications.
- 3. **Experimentation**: The primary objective is for increasing knowledge of predators in Nevada. NDOW may collaborate with other wildlife professionals to study and learn about predators of Nevada. Expected outcomes will include agency reports, peer-reviewed publications, and information on how to better manage Nevada's predators.

Project 21: Greater Sage-Grouse Protection (Common Raven Removal)

Justification	This project proposes to lethally remove common ravens from known Greater Sage-grouse habitat, common raven predation on Greater Sage-grouse nests and broods can limit population growth. Common ravens will be removed around known Greater Sage-grouse leks because most nest sites are located within 4 km of a lek. Common ravens will be removed in areas of known greater abundance to benefit sensitive populations of Greater Sage-grouse.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Implementation
Potentially Affected Species	Common raven, Greater Sage-grouse
Span More Than One Fiscal Year	Yes
Project Area	Elko, Eureka, Humboldt, Lander, Lincoln, Lyon, Washoe, and White Pine counties.
Limiting Factor Statement	Though predation is a naturally occurring phenomenon for Greater Sage-grouse, their populations can be suppressed by abiotic factors such as dry climate and loss of quality habitat. Increases in predator numbers can also cause decreases in Greater Sage-grouse populations; common raven abundance has increased throughout their native ranges, with increases as much as 1,500% in some areas (Boarman 1993, Coates et al. 2007, 2014, Sauer et al. 2011, O'Neil et al. 2018). Under these circumstances, common raven predation can have a negative influence of Greater Sage-grouse nesting success, recruitment, and population trend (Coates and Delehanty 2010).
Response Variable	Common raven point counts may be conducted before, during, and after removal to detect changes in common raven densities.
Project Goals	 Reduce common raven populations in high abundance areas that overlap sensitive Greater Sage-grouse populations identified by NDOW and USDA Wildlife Services wildlife biologists. Increase populations of Greater Sage-grouse in specific areas where deemed feasible.

Habitat Conditions	Areas of common raven removal will be within or in close proximity to Greater Sage-grouse leks, nesting habitat, and brood-rearing habitat. Persistent drought throughout Nevada has reduced herbaceous cover, along with nesting and brood rearing habitat; these effects are exacerbated by wildfire and the invasion of cheatgrass. Transmission lines, substations, and nearby agriculture production often attract common ravens which may threaten nearby Greater Sage-grouse populations.
Comments from FY 2023 Predator Report	Raven management, including lethal removal, is imperative to maintain and improve Greater sage-grouse and the ecosystems they depend on. NDOW recommends continuing Project 21 while common ravens are believed to be a limiting factor for Greater sage-grouse.
Methods	Chicken eggs treated with corvicide (DRC-1339) will be deployed to remove common ravens (Coates et al. 2007). To reduce non-target species exposure, no eggs will be left in the environment for over 168 hours. No leftover eggs will be used on subsequent treatments. All remaining eggs and any dead common ravens found will be collected and disposed of properly as per DRC-1339 protocol. DRC-1339 is effective only on corvids and most mammals and other birds are not susceptible to the specific effects from this agent.
	Monitoring Point counts for common ravens will be conducted from March through July of each year, which corresponds with Greater Sage-grouse nesting and broodrearing season. Surveys will be similar to Ralph et al. (1995): lasting 10 minutes; conducted between sunrise and 1400 hrs; conducted under favorable weather conditions; and stratified randomly across study areas (Luginbuhl et al. 2001, Coates et al. 2014).
	The removal of common ravens is intended to result in long-term protection for Greater Sage-grouse populations through increases in nest success, brood survival, and recruitment.
Anticipated Result	This project will continue until evidence demonstrating Greater sage-grouse nest success and recruitment are not limiting population growth due to common raven predation or common raven populations are in decline from non-lethal measures. The Department anticipates an increase in the USFWS raven depredation permit for this season.
Staff Comment	Project 21 will become progressively more precise with deliverables from Project 41. It is the Department's desire to ultimately use Project 21 to create temporary voids of ravens for Greater sage-grouse during sensitive times and to reverse the common raven population growth curve.
Project	Fund Project 21.

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Proposed Budget

\$3 Predator Fee	Pittman-Robertson	Total
\$175,000	N/A	\$175,000

Previous Budgets and Expenditures

	2008	2009	2010	2011	2012	2013	2014	2015	2016
Proposed	\$12,000	\$17,475	\$15,000	\$16,261	\$16,261	\$60,000	\$60,000	\$60,000	\$128,000
Spent	\$12,000	\$17,475	\$14,298	\$0	\$9,842	\$0	\$0	\$63,297	\$72,710
	2017	2018	2019	2020	2021	2022	2023	Total	
Proposed	\$103,000	\$125,000	\$125,000	\$200,000	\$175,000	\$175,000	\$175,000	\$1,462,997	
Spent	\$69,674	\$55,846	\$113,938	\$25,518	\$57,094	\$36,517	\$150,465	\$698,674	

Expenditures were combined with Project 21 and previously funded 21-02. Heritage expenditures were not included.

Project 22-01: Mountain Lion Removal to Protect California Bighorn Sheep (Recommended for Discontinuation)

(Recommit	ended for Discontinuation)
Justification	California bighorn sheep populations have been reintroduced in northwestern Nevada; mountain lion predation can be a significant source of mortality that may threaten this population's viability. Area 01 is in close proximity to the Sheldon National Wildlife Refuge, California, and Oregon; all three may act as a source for mountain lions. Mountain lions will be removed proactively by USDA Wildlife Services and private contractors until the local bighorn sheep populations reach population objectives.
Project Manager	Jon Ewanyk, Nevada Department of Wildlife
Project Type	Implementation
Potentially Affected Species	California bighorn sheep, mountain lion, mule deer
Span More Than One Fiscal Year	No
Project Area	Units 011 and 013
Limiting Factor Statement	Mountain lions are known predators of bighorn sheep (Rominger et al. 2004). Though predation is a naturally occurring phenomenon for bighorn sheep and other big game, their populations can be lowed or suppressed by abiotic factors such as dry climate and loss of quality habitat. Mitigating abiotic factors by removing predators is imperative for some bighorn sheep populations to stabilize (Rominger 2007).
Response Variable	The response variable will be the number of radio-marked bighorn sheep killed by mountain lions.
Project Goal	Remove mountain lions to proactively protect reintroduced California bighorn sheep.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, lambing, and browsing habitat. These effects may also be suppressing bighorn populations below population potential or preventing them from reaching self-sustaining levels. Currently, several collaborations between the Bureau of Land Management and NDOW to remove pinyon-juniper are scheduled. These removals are intended to improve bighorn sheep habitat, improve access to water sources, and to remove habitat that is ideal for mountain lions to focus on bighorn sheep.

Current Department Direction	End Project 22-01, combine with project 37
Methods	NDOW biologists, USDA Wildlife Services, and private contractors will collaborate to identify current and future California bighorn sheep locations and determine the best methods to reduce California bighorn sheep mortality. Traps, snares, baits, call boxes, and hounds will be used to proactively capture mountain lions as they immigrate into the defined sensitive areas.
Population Estimate	The population estimates for California Bighorn sheep in 011 are 20 and 013 is 60.
Anticipated Result	California bighorn herds may not be established in 011 or 013
Staff Comment	Duration of project combined with struggling populations suggest mountain lion predation is not limiting these populations
Project Direction	End Project 22-01, combine with project 37

Table 1. Population numbers to be used to redirect focus of project.

Action	Bighorn Sheep Population
Monitor bighorn population, conduct removal on case-by-case basis	> 80
Remove mountain lions that consume bighorn sheep*	60 - 80
Remove all mountain lions in area	< 60

^{*}Indicates need for monitoring local mountain lion population.

Budget

\$3 Predator Fee	Pittman-Robertson	<u>Total</u>
\$0	N/A	\$0

	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$25,000	\$50,000	\$90,000	\$90,000	\$90,000	\$90,000	\$90,000	\$90,000	\$100,000	\$715,000
Spent	\$91,183	\$54,094	\$84,927	\$123,141	\$75,650	\$86,814	\$99,197	\$100,011	\$35,836	\$750,853

Project 22-074: Monitor Rocky Mountain Bighorn Sheep for Mountain Lion Predation

Predation	
Justification	Rocky Mountain bighorn sheep populations have been established in portions of Nevada, but mountain lion predation can be a significant source for mortality that may threaten the population's viability. One collared bighorn sheep has been killed by mountain lions in the past year. The area biologists believe that mountain lion predation is not currently limiting the small bighorn sheep population, but even a small amount of predation has the potential to affect its viability.
Project	Kari Huebner, Nevada Department of Wildlife
Manager	Tata Traconer, Nevada Beparement of Whame
Project	Implementation
Type	Implementation
Potentially	
Affected	Rocky Mountain bighorn sheep, mountain lion
Species	
Span More	
Than One	Yes
Fiscal Year	
Project	
Area	Unit 074
Limiting Factor Statement	Mountain lions are known predators of bighorn sheep (Rominger et al. 2004). Though predation is a naturally occurring phenomenon for bighorn sheep and other big game, their populations can be lowed or suppressed by abiotic factors such as dry climate and loss of quality habitat. Mitigating abiotic factors by removing predators is imperative for some bighorn sheep populations to stabilize (Rominger 2007).
Response Variable	The response variable will be the number of radio-marked bighorn sheep killed by mountain lions.
Project Goal	Bighorn sheep populations will be monitored on a continual basis and predator control will be implemented as deemed necessary at the discretion of the Area Biologist.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, lambing, and browsing habitat. These effects may also be suppressing bighorn populations below population potential or preventing them from reaching self-sustaining levels.
Comments from FY 2023 Predator Report	NDOW supports continuing Project 22-074 until the local bighorn sheep reaches population viability as defined in the annual Predator Plan.
Methods	NDOW biologists will identify current and future Rocky Mountain bighorn

	sheep locations and determine the best methods to monitor this population. Additional GPS collars will be purchased and deployed to monitor the bighorn sheep population. If mountain lion predation is identified as an issue, then traps, snares, baits, call boxes, and hounds will be used to lethally remove mountain lions from the area.
Population Estimate	The population estimate for Rocky Mountain Bighorn sheep is approximately 25 individuals in area 074.
Anticipated Results	 Monitor the population of Rocky Mountain bighorn sheep. If mountain lion predation is identified as an issue, conduct lethal removal.
Staff Comment	Proactive mountain lion removal to assist struggling bighorn sheep populations is well documented within the scientific literature. This project has evolved from a proactive lethal removal project to a monitoring project.
Project Direction	Fund project 22-074. Monitor population. Begin mountain lion removal efforts if mountain lion predation is detected (table 2). Evaluate efficacy of project 22-074 annually. The Department will allocate project 22-074 funds to project 37 if they are not spent by 1 March 2025.

Table 2. Population numbers to be used to redirect focus of project.

Action	Bighorn Sheep Population
Monitor bighorn population, conduct removal on case-by-case basis	> 15
Remove mountain lions that consume bighorn sheep*	10 - 15
Remove all mountain lions in area	< 10

^{*}Indicates need for monitoring local mountain lion population.

Budget

\$3 Predator Fee	Pittman-Robertson	Total
\$20,000	N/A	\$20,000

	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$15,000	\$45,000	\$90,000	\$90,000	\$25,000	\$25,000	\$20,000	\$20,000	\$20,000	350,000
Spent	\$12,714	\$29,240	\$0	\$0	\$0	\$0	\$0	\$21,274	\$11,579	74,807

Project 37: Big Game Protection-Mountain Lions

1 Toject 57	Dig Game Protection-Mountain Lions
Justification	Predation issues frequently arise in a very short timeframe. These issues often occur within a fiscal year. By the time a project can be drafted, approved, and implemented, it may be too late to prevent or mitigate the predation issue. Removing mountain lions that prey on sensitive game populations quickly is a required tool to manage big game populations statewide.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Implementation
Potentially Affected Species	Mountain lion, mule deer, bighorn sheep, antelope
Span More Than One Fiscal Year	Yes
Project Area	Statewide
Limiting Factor Statement	Mountain lions are known predators of bighorn sheep and other big game species (Rominger et al. 2004). Though predation is a naturally occurring phenomenon for bighorn sheep and other big game, their populations can be lowered or suppressed by abiotic factors such as dry climate and loss of quality habitat. Mitigating abiotic factors by removing predators is imperative for some bighorn sheep populations to stabilize (Rominger 2007).
Response Variable	Response variables may include reduction of prey taken by mountain lions, removal of a mountain lion that was documented consuming the concerned big game species, or a reduction in mountain lion sign. Because of the quick nature of the project, there may be times when no response variable will be measured.
Project Goal	Remove specific, problematic mountain lions to benefit game species.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, lambing, and browsing habitat. These effects may have reduced mule deer and other big game populations below population potential. These effects may also be suppressing mule deer or big game populations below population potential (Ballard et al. 2001).
Comments from FY 2023 Predator Report	NDOW supports continuing Project 37 until local bighorn sheep populations become viable as defined in the annual Predator Report. NDOW supports the ability to remove mountain lions quickly.
Methods	NDOW will specify locations of mountain lions that may be influencing local declines of sensitive game populations. Locations will be determined with GPS collar points, trail cameras, and discovered mountain lion kill sites. Removal efforts will be implemented when indices levels are reached, these include low

	annual adult survival rates, poor fall young:female ratios, spring young:female ratios, and low adult female annual survival rates (table 3). Depending on the indices identified, standard to intermediate levels of monitoring will be implemented to determine the need for or effect of predator removal. These additional monitoring efforts may be conducted by NDOW employees, USDA Wildlife Services, or private contractors.
	Staff and biologists will identify species of interest, species to be removed, measures and metrics, and metric thresholds. This information will be recorded on the Local Predator Removal Progress Form and included in the annual predator report.
Anticipated Results	 Lethal removal of individual, problematic mountain lions will provide a precise tool, protecting reintroduced and sensitive big game populations. Implementation will occur in association with game populations that are sensitive (e.g., small in size, limited in distribution, in decline) and may benefit from rapid intervention from specific predation scenarios.
Staff Comment	Proactive mountain lion removal to assist struggling bighorn sheep populations is well documented within the scientific literature.
Project Direction	Fund Project 37.

Table 3. Indices used to initiate predator removal.

Species	Annual Adult Survival	Fall Young: Female	Spring Young:	Adult Female Annual Survival
	Rates	Ratios	Female Ratios	Rates
California Bighorn Sheep	< 90%	< 40:100		
Rocky Mountain Bighorn Sheep	< 90%	< 40:100		
Desert Bighorn Sheep	< 90%	< 30:100		
Mule Deer			< 35:100	< 80%
Pronghorn	< 90%	< 40:100		

<u>Budget</u>

\$3 Predator Fee	Pittman-Robertson	Total
\$100,000	N/A	\$100,000

	2016	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$90,000	\$125,000	\$175,000	\$50,000	\$75,000	\$75,000	\$100,000	\$100,000	\$790,000
Spent	\$26,670	\$192,427	\$175,217	\$67,233	\$71,465	\$60,357	\$52,764	\$160,735	\$806,868

Project 38: Big Game Protection-Coyotes

Troject 30	Big Game Protection-Coyotes
Justification	Predation issues frequently arise in a very short timeframe. These occurrences often occur within a fiscal year, therefore by the time a project can be drafted, approved, and implemented, to prevent or mitigate the predation issue, it may be too late. Removing problematic coyotes quickly is a required tool to manage big game populations statewide.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project	
Type	Implementation
Potentially	
Affected	Coyote, mule deer, antelope, Greater Sage-grouse
Species	
Span More	
Than One	Yes
Fiscal Year	
Project	Statewide
Area	
Limiting Factor Statement	Though predation is a naturally occurring phenomenon for mule deer and other big game, their populations can be lowered or suppressed by abiotic factors such as dry climate and loss of quality habitat. Predation from coyotes may further suppress these populations (Ballard et al. 2001).
Response Variable	Response variables may include reduction of prey taken by coyotes, removal of a coyote that was documented consuming the concerned big game species, or a reduction in coyote sign. Because of the quick nature of the project, there may be times when no response variable will be measured.
Project Goal	Conduct focused coyote removal to protect game species.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, lambing, and browsing habitat. These effects may have reduced mule deer and other big game populations below population potential. These effects may also be suppressing mule deer or big game populations below population potential (Ballard et al. 2001).
Comments from FY 2023 Predator Report	NDOW supports continuing Project 38 pending available funding.
Methods	USDA Wildlife Services and private contractors, working under direction of NDOW, will use foothold traps, snares, fixed-wing aircraft and helicopters for aerial gunning, calling and gunning from the ground to remove coyotes in sensitive areas during certain times of the year. Work will be implemented when

Anticipated Results	indices levels are reached, these include low annual adult survival rates, poor fall young:female ratios, poor spring young:female ratios, and low adult female annual survival rates (table 3). Depending on the indices identified, standard to intermediate levels of monitoring will be implemented to determine the need for or effect of predator removal. These additional monitoring efforts may be conducted by NDOW employees, USDA Wildlife Services, or private contractors. 1. Removal of coyotes in winter range and fawning and lambing areas in certain situations will provide a valuable tool for managers. 2. Implementation will occur during times and locations where sensitive game species are adversely affected (e.g., local decline, reduced recruitment) based on the best available biological information.
Staff	Proactive coyote removal to assist struggling pronghorn populations is well
Comment	documented within the scientific literature.
Project	Fund Project 38.
Direction	

Table 3. Indices used to initiate predator removal.

Species	Annual Adult	Fall Young:	Spring	Adult Female
	Survival	Female	Young:	Annual Survival
	Rates	Ratios	Female Ratios	Rates
California Bighorn Sheep	< 90%	< 40:100		
Rocky Mountain Bighorn Sheep	< 90%	< 40:100		
Desert Bighorn Sheep	< 90%	< 30:100		
Mule Deer			< 35:100	< 80%
Pronghorn	< 90%	< 40:100		

Budget

\$3 Predator Fee	Pittman-Robertson	Total
\$100,000	N/A	\$100,000

	2016	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$90,000	\$125,000	\$175,000	\$50,000	\$75,000	\$75,000	\$100,000	\$100,000	\$790,000
Spent	\$97,794	\$135,507	\$133,720	\$50,569	\$73,480	\$60,905	\$1,270	\$150,757	\$704,002

Project 40: Coyote and Mountain Lion Removal to Complement Multi-faceted Management in Eureka County

Manageme	ent in Eureka County
Justification	Continuing predator removal will complement previous coyote removal, feral horse removal, and habitat restoration to benefit mule deer populations.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Implementation
Potentially Affected Species	Coyote, Greater Sage-grouse, mule deer, mountain lion
Span More Than One Fiscal Year	Yes
Project Area	MA 14
Limiting Factor Statement	Though predation is a naturally occurring phenomenon for mule deer and other big game, their populations can be reduced or suppressed by abiotic factors such as dry climate and loss of quality habitat, these populations can be suppressed by predation from coyotes (Ballard et al. 2001).
Response Variable	The response variable will be the fawn to doe ratios in the Diamond Mountains. This ratio will be observed throughout the life of the project. The project will be altered or discontinued after three consecutive years of observed spring fawn:adult ratios averaging 50:100 or higher.
Project Goal	To increase mule deer and Greater Sage-grouse populations by removing coyotes and mountain lions.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, fawning, and browsing habitat. These effects may have reduced mule deer below population potential. These effects may also be suppressing mule deer below population potential (Ballard et al. 2001).
Comments from FY 2023 Predator Report	NDOW supports continuing Project 40 until mule deer populations reach levels defined in the annual Predator Plan.
Methods	USDA Wildlife Services and private contractors working under direction of NDOW and Eureka County, will use foothold traps, snares, fixed-wing aircraft and helicopters for aerial gunning, and calling and gunning from the ground to remove coyotes in sensitive areas during certain times of the year.
Anticipated Result	Coyote removal will complement feral horse removal already conducted by the BLM, habitat improvement conducted by Eureka County, private coyote removal funded by Eureka County, and Wildlife Service coyote removal funded

	through Wildlife Heritage funds in 2011 and 2012.
Staff Comment	The Department supports multi-faceted management projects such as Project 40.
Project	Fund Project 40. Evaluate efficacy of Project 40 annually.
Direction	

<u>Budget</u>

\$3 Predator Fee	Pittman-Robertson	1 Total
\$100,000	N/A	\$100,000

	2016	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$60,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$150,000	\$810,000
Spent	\$36,402	\$109,432	\$110,960	\$107,461	\$83,213	\$100,445	\$97,251	\$134,269	\$779,433

Project 41: Increasing Understanding of Common Raven Densities and Space Use in Nevada

Use III Nev	uuu
Justification	Common ravens are the primary predator of Greater Sage-grouse nests and chicks (Coates and Delehanty 2010). Their populations have increased dramatically in Nevada, primarily due to human subsidies (Boarman 1993, Sauer et al. 2011). Understanding common raven density, distribution, and subsidy use will allow for intelligent management decisions to be made to reduce or alter common raven densities in Nevada. These efforts are intended to benefit Greater Sage-grouse, though desert tortoise may also benefit from this project.
Project	Dat Jackson, Navada Danautmant of Wildlife
Manager	Pat Jackson, Nevada Department of Wildlife
Project	Eventumentation
Type	Experimentation
Potentially	
Affected	Greater Sage-grouse, common raven, desert tortoise
Species	
Span More	
Than One	Yes
Fiscal Year	
Project	Statewide
Area	
Limiting Factor Statement	Though predation is a naturally occurring phenomenon for Greater Sage-grouse, their populations can be suppressed by abiotic factors such as dry climate and loss of quality habitat. Increases in predator numbers can also cause decreases in Greater Sage-grouse populations; common raven abundance has increased throughout their native ranges, with increases as much as 1,500% in some areas (Boarman 1993, Coates et al. 2007, Sauer et al. 2011). Under these circumstances, common raven predation can have a negative influence of Greater Sage-grouse nesting success, recruitment, and population trend (Coates and Delehanty 2010). Common raven predation has also been documented to negatively impact desert tortoise populations (Boarman 1993, Kristan and Boarman 2003)
Response Variable	No response variable will be collected, this is an experimentation project.
Project Goals	 Increase understanding of common raven density, distribution, and subsidy use to maximize common raven management effectiveness. Develop a protocol to estimate common raven populations in Greater Sagegrouse habitat and monitor these populations. Increase the understanding of how human subsidies affect common raven movements and space use, particularly near Greater Sage-grouse leks and nesting areas. Develop a resource selection function model to identify landscape features that influence common raven abundance and that may be used in conjunction with Greater Sage-grouse priority habitat maps to locate sites where lethal

	treatments of common ravens may be applied with the greatest efficacy and efficiency.
Habitat Conditions	Persistent drought throughout Nevada has reduced herbaceous cover, along with nesting and brood rearing habitat; these impacts are exacerbated through wildfire and the invasion of cheatgrass. Transmission lines, substations, and nearby agriculture production also threaten Greater Sage-grouse habitat.
Comments from FY 2023 Predator Report	Common raven predation may be the greatest limiting factor in Greater sage-grouse nest success, NDOW supports continuing Project 41.
	Population monitoring and space use Point counts for common ravens will be conducted from March through July of each year, which corresponds with Greater Sage-grouse nesting and brood-rearing season. Surveys will be similar to Ralph et al. (1995): lasting 10 minutes; conducted between sunrise and 1400; conducted under favorable weather conditions; and stratified randomly across study areas (Luginbuhl et al. 2001, Coates et al. 2014). ARGOS backpack transmitters will be deployed to monitor common raven space use and space use.
Methods	Development of Resource Selection Function (RSF) An RSF will be developed using data on landscape features collected in habitats with varying observed abundance indices for common ravens. The abundance indices collected will include common raven point count and Greater Sagegrouse point counts. The landscape features that will be entered into the model will include 1 meter resolution digital elevation models and fire regime. The RSF for common ravens will be overlaid on polygons that feature Greater Sagegrouse priority habitats.
	Identifying habitats likely to support high numbers of common ravens where Greater Sage-grouse conservation is of highest priority will provide future locations where common raven removal may be warranted, land use activities may be modified, or more intensive Greater Sage-grouse monitoring may be focused.
	Utility line surveys Various utility lines will be identified in and near Greater Sage-grouse habitat from February until June of each year, which corresponds with common raven nesting and brood rearing. Surveys will be conducted from OHV vehicles, variables including utility pole type, cross arm type, utility pole height, insulator position, perch deterrent effectiveness, and proximity to Greater Sage-grouse habitat will be recorded.

Anticipated Results	1. Develop a protocol to estimate common raven populations in Greater Sagegrouse habitat and monitor these populations.
	2. Increase the understanding of common raven density and distribution in the state of Nevada, and how human subsidies increase common raven density and distribution.
	3. Determine what common raven removal location will provide the greatest benefit to Greater Sage-grouse. Determine what time of the year is the optimal
	time to conduct common raven removal to optimize benefit to Greater Sagegrouse.
Staff Comment	Project 41 has resulted in on of the largest GPS location datasets for common ravens in history. It has also resulted in several peer-reviewed publications. The most recent list of these accomplishments may be found in the Appendix of the FY 2023 Predator Report.
	This project will develop a statewide population estimate for ravens, common raven growth rate, a common raven density map, detailed analysis of common raven movement and space use, and information necessary to increase the USFWS depredation permit.
Project	Fund Project 41.
Direction	

<u>Budget</u>

\$3 Predator Fee	Pittman-Robertson	Total
\$60,000	\$180,000	\$240,000

	2017	2018	2019	2020	2021	2022	2023	Total
Proposed \$3	\$100,000	\$100,000	\$100,000	\$87,500	\$87,500	\$87,500	\$300,000	\$862,500
Proposed PR	\$300,000	\$300,000	\$300,000	\$262,500	\$262,500	\$262,500	\$0	\$1,687,500
Spent	\$255,611	\$351,417	\$323,443	\$504,656	\$267,451	\$258,387	\$256,644	\$2,217,609

Project 42: Assessing Mountain Lion Harvest in Nevada (Recommended for Discontinuation)

Discontinu	
Justification	Nevada Department of Wildlife has a yearlong mountain lion hunting season limited by harvest quotas, although mountain lions are also lethally removed for livestock depredation and to limit predation on specific wildlife populations. Statewide annual adult female harvest is ≤35%, which indicates that statewide harvests are unlikely to be reducing statewide mountain lion population abundance (Anderson and Lindzey 2005). Nevertheless, regional area harvests may be greater and can be more difficult to assess the effects due to small sample sizes. Conversely, current NDOW mountain lion removal projects may not be sufficiently intensive to reduce local mountain lion populations to attain reduced predation on prey populations. Improved understanding of mountain lion population dynamics in Nevada would allow for better informed management.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Experimentation
Potentially Affected Species	Mountain lion, mule deer, bighorn sheep, elk
Span More Than One Fiscal Year	Yes
Project Area	Statewide
Limiting Factor Statement	Habitat and prey availability likely limit mountain lion populations in the state of Nevada.
Response Variable	No response variable will be collected, this is an experimentation project.
Project Goals	 Develop a population model that incorporates NDOW mountain lion harvest data to predict the number of mountain lions that must be removed to reach desired goals in mountain lion removal projects. Identify limitations and gaps in the existing demographic data for mountain lions that precludes a more complete understanding of mountain lion population dynamics and limits NDOW's management ability with the greatest efficacy and efficiency. Create a user-friendly model interface for Department employees to model local populations and improve understanding. Draft and ideally publish work in a peer-reviewed manuscript.

Habitat Conditions	This work would not be conducted in the field but would rely on statewide harvest data collected over time to include periods of normal and less-than-normal precipitation. Due to the span of the state data collection, habitat during the period of inference would also span a wide variety of conditions and vegetative communities.
Current Department Direction	End Project 42
Methods	A private contractor will use existing mountain lion harvest data collected by NDOW biologists to develop a harvest model. The modeling approach will involve Integrated Population Modeling (IPM) which brings together different sources of data to model wildlife population dynamics (Abadi et al. 2010, Fieberg et al. 2010). With IPM, generally a joint analysis is conducted in which population abundance is estimated from survey or other count data, and demographic parameters are estimated from data from marked individuals (Chandler and Clark 2014). Age-at-harvest data can be used in combination with other data, such as telemetry, mark-recapture, food availability, and home range size to allow for improved modeling of abundance and population dynamics relative to using harvest data alone (Fieberg et al. 2010). Depending on available data, the contractor will build a count-based or structured demographic model (Morris and Doak 2002) for mountain lions in Nevada. The model (s) will provide estimates of population growth, age and sex structure, and population abundance relative to different levels of harvest.
Anticipated Results	 Estimate statewide population dynamics, age structure, and sex structure of mountain lions in the state of Nevada with existing NDOW data. Recommend additional data that could be collected to improve the model and reduce uncertainty in model results in the future.
Staff Comment	Limitations in federal funding combined with a final manuscript for this project allow for it to end
Project Direction	End Project 42

\$3 Predator Fee	Pittman-Robertson	Total	
\$0	\$0	\$0	

	2017	2018	2019	2020	2021	2022	2023	Total
Proposed \$3	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$5,000	\$5,000	\$22,500
Proposed PR	\$7,500	\$7,500	\$7,500	\$7,500	\$7,500	\$15,000	\$15,000	\$67,500
Spent	\$0	\$0	\$0	\$0	\$14,850	\$14,850	\$14,850	\$44,550

Project 43: Mesopredator removal to protect waterfowl, turkeys, and

pheasants on Wildlife Management Areas

Justification Project	Mesopredators including coyotes, striped skunks, and raccoons often consume waterfowl, pheasant, and turkey eggs. Consuming these eggs may limit fowl species population growth and could be causing a decline on Overton and Mason Valley Wildlife Management Areas.					
Manager	Isaac Metcalf and Bennie Vann, Nevada Department of Wildlife					
Project Type	Implementation					
Potentially Affected Species	Assorted waterfowl, turkey, pheasant, coyote, striped skunk, raccoon					
Span More Than One Fiscal Year	Yes					
Project Area	Overton and Mason Valley Wildlife Management Areas					
Limiting Factor Statement	Though predation is a naturally occurring phenomenon for waterfowl, turkeys, and pheasants, their populations can be lowed or suppressed by abiotic factors such as dry climate and loss of quality habitat.					
Response Variable	The response variable for waterfowl, turkeys, and pheasants will be the number of females with clutches, and the number of young per clutch.					
Project Goals	To increase clutch size and survival of waterfowl, turkeys, and pheasants on Overton and Mason Valley WMAs.					
Habitat Conditions	Persistent drought throughout Nevada has reduced herbaceous cover, nesting, and browsing habitat.					
Comments from FY 2023 Predator Report	NDOW recommends continuing project 43 pending funding availability.					
Methods	USDA Wildlife Services and private contractors working under direction of NDOW, will use foothold traps, snares, calling and gunning from the ground to remove coyotes, striped skunks, and raccoons during waterfowl, turkey, and pheasant nesting seasons.					
Anticipated Results	 Increase the number of female turkeys, waterfowl, and pheasants that successful raise clutches. Increase the number female turkeys, waterfowl, and pheasants that have clutches. 					

	This project will be cancelled or altered once there are two consecutive three- year averages where:
	The average hen turkey successfully raises 3 poults. Area biologists believe pheasants no longer need predator removal.
Staff Comment	Area managers have noticed a substantial increase in waterfowl nest success and an increase in clutch size since the inception of project 43.
Project Direction	Fund Project 43.

Budget

\$3 Predator Fee	Pittman-Robertson	<u>Total</u>
\$50,000	N/A	\$50,000

	2017	2018	2019	2020	2021	2022	2023	Total
Proposed	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$350,000
Spent	\$42,246	\$28,447	\$38,038	\$20,849	\$17,350	\$20,933	\$22,282	\$190,145

Project 44: Lethal Removal and Monitoring of Mountain Lions in Area 24

1 Tojece 1 I	: Lethal Removal and Monitoring of Mountain Lions in Area 24						
Justification	The local desert bighorn sheep population has been underperforming in the Delamar Mountains since the initial reintroduction in 1996 (M. Cox, <i>personal communication</i>). Mountain lions may be a contributing factor to this underperformance.						
Project	Pat Jackson, Nevada Department of Wildlife						
Manager	rat Jackson, Nevada Department of which te						
Project Type	Experimental Management						
Potentially							
Affected	Mountain lion, bighorn sheep						
Species							
Span More							
Than One	Yes						
Fiscal Year	Amag 22 and 24						
Project Area	Areas 23 and 24						
Limiting Factor Statement	Mountain lions are known predators of bighorn sheep and other big game species (Rominger et al. 2004). Though predation is a naturally occurring phenomenon for bighorn sheep and other big game, their populations can be lowered or suppressed by abiotic factors such as dry climate and loss of quality habitat. Mitigating abiotic factors by removing predators is imperative for some bighorn sheep populations to stabilize (Rominger 2007).						
Response Variable	Response variables may include reduction of prey taken by mountain lions, removal of a mountain lion that was documented consuming the concerned big game species, or a reduction in mountain lion sign. Because of the quick nature of the project, there may be times when no response variable will be measured.						
Project Goals	 Remove specific, problematic mountain lions to benefit desert bighorn sheep Deploy and maintain up to 20 GPS collars on mountain lions in proximity area to increase understanding of mountain lion diet, space use, and movement. 						
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, lambing, and browsing habitat. These effects may have reduced bighorn sheep and other big game populations below population potential. These effects may also be suppressing mule deer or big game populations below population potential (Ballard et al. 2001).						
Comments from FY 2023 Predator Report	NDOW supports continuing Project 44 until the local bighorn sheep populations reach viability as defined in the annual Predator Plan. NDOW also supports reactive removal of offending mountain lions while learning more about local mountain lion diet. NDOW appreciates its ongoing collaboration with the US Geological Survey and Utah State University.						
Methods	Mountain lions consuming bighorn sheep will be reactively removed; one bighorn sheep killed and that lion will be removed.						

	Mountain lions will be captured with the use of hounds and/or foot snares. Captured mountain lions will be chemically immobilized and marked with a GPS collar.
Anticipated Results	Remove any offending mountain lion known to be consuming bighorn sheep.
Results	2. Increase understanding of mountain lion movements, space use, and diet within the proximity area.
	3. Increase local bighorn sheep adult annual survival rates and fall young:female ratios.
	4. Increase understanding of mountain lion, feral horse, and mule deer interactions.
Staff	Determining mountain lion prey selection prior to lethal removal allows the
Comment	Department to make more informed decisions on which mountain lion to
	remove. The Delamar based lions are consuming a substantial number of feral
	horses. The Department will increase our understanding of the effect mountain
	lions can have on feral horse populations.
	NDOW supports continuing Project 44 until the local bighorn sheep populations
Project	reach viability as defined in the annual Predator Plan. NDOW also supports
Direction	reactive removal of offending mountain lions while learning more about local
	mountain lion diet. NDOW supports seeking outside collaboration and funding sources.

\$3 Predator Fee	Pittman-Robertson	Total
\$ 125,000	N/A	\$ 125,000

	2019	2020	2021	2022	2023	Total
Proposed	\$50,000	\$75,000	\$100,000	\$100,000	\$100,000	\$425,000
Spent	\$61,770	\$145,825	\$68,686	\$136,576	\$91,135	\$503,992

Project 45: Passive Survey Estimate of Black Bears in Nevada

	-
Justification	Black bears are expanding numerically and geographically, and in so doing they are recolonizing historic ranges in Nevada. It is imperative the Department be able to estimate Nevada's black bear population and monitor growth and change. Being able to do so passively will ensure the Department can reach these objectives safely and cost efficiently.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project	Experimentation
Type	Experimentation
Potentially	
Affected	Black bear
Species	
Span More	T.
Than One Fiscal Year	Yes
	Units 014, 015, 021, 192, 194, 195, 196, 201, 202, 203, 204, 291
Project Area	Ollits 014, 013, 021, 192, 194, 193, 190, 201, 202, 203, 204, 291
Limiting Factor Statement	Black bears have recently expanded their distribution in western Nevada to include historical bear habitat in desert mountain ranges east of the Sierra Nevada and Carson Front (Beckmann and Berger 2003, Lackey et al. 2013). Nevada black bears are an extension of a California based metapopulation (Malaney et al. 2017), monitoring this rewilding is important for proper management.
Response Variable	No response variable will be collected, this is an experimentation project.
Project Goals	 Passively estimate the abundance of black bears in Nevada. Predict the density and occupancy of black bears in Nevada. Continue as a portion of project 46.
Habitat Conditions	The study area consists of mountain ranges and associated basins that are characterized by steep topography with high granite peaks and deep canyons. Mountain ranges are separated by desert basins that range from 15–64 km across (Grayson 1993). These basins are often large expanses of unsuitable habitat (e.g., large areas of sagebrush) that bears and mountain lions do not use as primary habitat.
Comments from FY 2023 Predator Report	NDOW also recommends continuing Project 45 as a monitoring project.
Methods	In a collaboration with Oxford and University of Montana, trail cameras will be

	maintained on a grid to determine black bear density. Existing black bear GPS data will be incorporated into models. These data will ultimately result in a population estimate.
Anticipated	1. A statewide black bear population estimate.
Results	2. An estimate of black bear occupancy, density, and abundance based on hair snares and trail cameras.
	3. Guidance to the Department on which methods will be best suited for sustained population estimation.
Staff	Project 45 will allow the Department to make more informed decisions on
Comment	statewide black bear management, including the black bear hunt seasons and
	harvest limits.
Project	Fund Project 45.
Direction	

Budget

\$3 Predator Fee	Pittman-Robertson	<u>Total</u>
\$5,000	\$15,000	\$20,000

	2019	2020	2021	2022	2023	Total
Proposed \$3	\$40,000	\$40,000	\$25,000	\$5,000	\$5,000	\$115,000
Proposed PR	\$120,000	\$120,000	\$75,000	\$15,000	\$15,000	\$345,000
Spent	\$343,955	\$205,383	\$99,858	\$0	\$20,000	\$669,196

Project 46: Investigating Potential Limiting Factors Impacting Mule Deer in Northwest Nevada

Justification	Recent decades have seen Northwest Nevada's mule deer herds decline, resulting in fewer tags issued and low-quality hunt experiences. Several factors may be contributing, including predation, drought, wildland fire, invasive plant species, and competition from feral horses. A combination of these factors are likely at play, it is the Department's desire to better understand the situation.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Experimental Management
Potentially Affected Species	Mule deer, bighorn sheep, pronghorn, coyote, mountain lion, feral horse
Span More Than One Fiscal Year	Yes
Project Area	Units 021, 011, 012, 013, 014, 015, 032, 033, 034
Limiting Factor Statement	Predation, drought, fire, degraded habitat, and competition from feral horses may all be limiting factors.
Response Variable	For the first phase of this project, no treatment is expected, therefore no response variable will be collected.
Project Goals	 Accurately estimate mountain lion, feral horse, mule deer and/or pronghorn densities in specified areas. Increase understanding of how mountain lion, feral horse, mule deer and/or pronghorn densities changes throughout the course of a year. Deploy GPS transmitters on mountain lions within the study site, including the Sheldon NWR.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, fawning or lambing, and browsing habitat. These effects may have reduced mule deer and other big game populations below population potential. These effects may also be suppressing mule deer or big game populations below population potential (Ballard et al. 2001).

Comments from FY 2023 Predator Report	Project 46 has the potential to greatly increase the understanding of flora and fauna communities in northwest Nevada.
Methods	In a collaboration with outside researchers, trail camera grids will be placed in strategic locations to determine densities of both predators and prey species. The locations of these camera grids will be determined by using area biologist and input, existing mule deer GPS data, BLM feral horse estimates, and other forms of institutional knowledge.
Anticipated Results	 A better understanding of predator and prey densities across Northwest Nevada. Specific management recommendations.
Staff Comment	Project 46 should be considered the analysis of a "check engine" light in Northwest Nevada. Upon completion the Department will have a better understanding of predator and prey densities in Northwest Nevada.
Project Direction	Fund Project 46 through FY 2027. Seek outside funding opportunities such as Heritage Grant funds.

<u>Budget</u>

\$3 Predator Fee	Pittman-Robertson	Total
\$40,000	\$120,000	\$160,000

	2021	2022	2023	Total
Proposed \$3	\$15,000	\$40,000	\$40,000	\$95,000
Proposed PR	\$45,000	\$120,000	\$160,000	\$325,000
Spent	\$86,308	\$172,736	\$159,999	\$419,043

Project 47: Mule Deer Enhancement Program Mule Deer Protection and Assessment

Justification	Many of the projects proposed by MDEP subcommittees are for areas of low densities of mule deer or where populations have trended downward and/or have remained suppressed for extended periods of time.
Project Manager	Pat Jackson, Nevada Department of Wildlife
Project Type	Implementation or Experimental Management
Potentially Affected Species	Mule deer, coyote, mountain lion
Span More Than One Fiscal Year	Yes
Project Area	Statewide
Limiting Factor Statement	Drought, fire, degraded habitat, and competition from feral horses may all be limiting factors. Predation and its interactions with these factors are the primary focus.
Response Variable	To Be Determined
Project Goals	 Address MDEP committee and sportsmen concerns. Increase mule deer population numbers or minimize loss to mule deer populations. Increase understanding of predator removal on mule deer populations.
Habitat Conditions	Persistent drought combined with fires and human disturbances throughout Nevada have reduced herbaceous cover, fawning or lambing, and browsing habitat. These effects may have reduced mule deer and other big game populations below population potential. These effects may also be suppressing mule deer or big game populations below population potential (Ballard et al. 2001).
Comments from FY 2023 Predator Report	NA

Methods	Underperforming mule deer populations will be identified by local mule deer enhancement program committees. Working with the mule deer oversight committee, NDOW staff, and outside collaborators, predation as a limiting factor will be assessed. If predation is determined to be a likely limiting factor, one of two steps may be taken: 1. Address predation through projects 37 or 38. 2. Working with an outside collaborator, conduct experimental
	management to address predation and create a model to inform the department when predator removal will and will not benefit mule deer populations.
Anticipated Results	 Healthier mule deer populations A model to aid the Department in deciding when to and not to conduct predator control for the benefit of mule deer. Contribute to mule deer biology knowledge through written documents, oral presentations, and public outreach
Staff Comment	NA
Project Direction	Fund Project 47

<u>Budget</u>

\$3 Predator Fee	Pittman-Robertson	Total
\$100,000	\$ TBD	\$100,000

Previous Budgets and Expenditures

N/A

Overall FY 2025 Budget

Project	Predator Fee	PR Funds	Total
Department of Agriculture Administrative Support Transfer ^a	\$14,000	N/A	\$14,000
Project 21: Greater Sage-Grouse Protection (Common Raven Removal)	\$175,000	N/A	\$175,000
Project 22-01: Mountain Lion Removal to Protect California Bighorn Sheep	\$0	N/A	\$0
Project 22-074: Monitor Rocky Mountain Bighorn Sheep for Mountain Lion Predation	\$20,000	N/A	\$20,000
Project 37: Big Game Protection-Mountain Lions	\$100,000	N/A	\$100,000
Project 38: Big Game Protection-Coyotes	\$100,000	N/A	\$100,000
Project 40: Coyote and Mountain Lion Removal to Complement Multi-faceted Management in Eureka County	\$100,000	N/A	\$100,000
Project 41: Increasing Understanding of Common Raven Densities and Space Use in Nevada	\$60,000	\$180,000	\$240,000
Project 42: Assessing Mountain Lion Harvest in Nevada	\$0	\$0	\$0
Project 43: Mesopredator Removal to Protect Waterfowl, Turkeys, and Pheasants on Wildlife Management Areas	\$50,000	N/A	\$50,000
Project 44: Lethal Removal and Monitoring of Mountain Lions in Area 24	\$125,000	N/A	\$125,000
Project 45: Passive Survey Estimate of Black Bears in Nevada	\$0	\$0	\$0
Project 46: Investigating Potential Limiting Factors Impacting Mule Deer in Northwest Nevada	\$40,000	\$120,000	\$160,000
Project 47: Mule Deer Enhancement Program Mule Deer Protection and Assessment	\$100,000	NA	\$100,000
Total ^b	\$889,000	\$315,000	\$1,204,000

^a This transfer of \$3 predator fees for administrative support to the Department of Agriculture partially funds state personnel that conduct work for the benefit of wildlife at the direction of USDA Wildlife Services (e.g., mountain lion removal to benefit wildlife).

Expected Revenues and Beginning Balance of \$3 Predator Fee

	FY 2022 Actual	FY 2023 Actual	FY 2024 Projected	FY 2025 Estimated
Beginning balance	\$622,969	\$930,654	\$641,884	\$641,884
Revenues	\$911,013	\$944,410	\$944,410	\$944,410
Plan Budget	\$886,500	\$1,159,000	\$1,059,000	\$889,000
Expenditures	\$603,328	\$1,106,142	\$1,106,142	\$889,000
Ending balance	\$930,654	\$641,884	\$641,884	\$730,294

^b The projects that contain lethal removal as a primary aspect, making them ineligible for Federal Aid funding.

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