

Decision and Finding of No Significant Impact

Management of Conflicts Associated with Non-migratory (resident) Canada Geese in the Puget Sound Area

1. Introduction

The United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (WS) works cooperatively with Federal, state, and local governments, public and private organizations and individuals to reduce wildlife caused damage and conflicts. WS's authority comes from the Animal Damage Control Act of March 2, 1931, as amended, and pursuant to the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988.

WS has completed an Environmental Assessment (EA) (April 22, 1999) that analyzed potential impacts of a proposed program and alternatives to manage conflicts associated with non-migratory (resident) Canada geese in the Puget Sound area. Based on a review of the EA, the Western Regional Director of WS has decided to select the (Proposed Action) Expanded Program Alternative and to issue a Finding of No Significant Impact (FONSI).

2. Background

Since their introduction to the Puget Sound region, the number of resident, non-migratory, western Canada geese (*Branta canadensis moffitti*) have increased dramatically. As their population increased, so did many of the problems that they caused. Concentrations of geese in the vicinity of airports have posed threats to safe aircraft operations. Canada geese and their droppings have caused property damage in both public and private settings. Public beaches and swimming areas have been closed due to fecal coliform bacteria (rRNA identified as goose), and numerous parks and athletic fields have been contaminated with fecal matter. Residents report a negative impact on their quality of life due to an over-abundance of Canada geese and the problems they cause.

WS has established a history, dating back more than a decade, of gradually increasing responses to goose-caused damage. Starting with a technical assistance program and gradually adding direct control consisting of all nonlethal methods and then integrating some limited lethal methods, WS is faced with the need to once again expand their efforts.

3. Issues

The following resident Canada goose damage management issues were identified during the interagency and public involvement processes. These issues were determined to be important and were used to drive the environmental analysis.

1. Humaneness of control methods. Humaneness is a person's perception of the impact of an action on animal pain and suffering, and individuals may perceive the humaneness of an action differently.
2. Possible impact of control methods on non-target, Threatened, and Endangered Species from implementing control methods.
3. Impact on the population of resident Canada geese (target species).
4. Aesthetic value of geese, public viewing opportunities.
5. Effectiveness of control measures in reducing or minimizing damage.

4. Alternatives

The following alternative courses of action were developed with input from the cooperating agencies and the public.

Alternative 1: Current Program Alternative (No Action)

Alternative 1 is the "No Action" Alternative. The "No Action" Alternative is a procedural NEPA requirement (40 CFR 1502.14(d)). A continuation of the current program, an integrated wildlife damage management approach, was not selected because the effectiveness of this approach has been decreasing over time, due to limitations on when lethal control may be applied. Nonlethal controls that have been effective in the past are in some cases no longer appropriate.

Alternative 2: Nonlethal and Technical Assistance Only Alternative

Alternative 2 would discontinue any lethal direct control of geese by WS, except in emergency situations involving human health and safety. If lethal direct control were used in other situations, it would be employed by persons or programs other than WS. Both nonlethal direct control and technical assistance as described in 2.1 would continue to be provided by WS.

Requests for lethal direct control would be referred to the USFWS. Under the present permitting system, WS frequently assists USFWS by providing site specific recommendations regarding the extent of the problem, potential solution, whether a

permit should be issued, and if so how many birds should be removed. Permits could be requested to allow the property owners or resource managers to implement lethal methods themselves or contract others to do so. Permits would be issued by and at the discretion of USFWS.

Alternative 3: Nonlethal Methods First Alternative

Alternative 3 is similar to the Current Program except that WS personnel would be required to recommend or use nonlethal methods prior to recommending or using lethal methods to control goose damage. Unlike the Current Program, lethal control would not be limited to situations of human health and safety. Both technical assistance and direct control would be provided in the context of a modified IWDM approach. As in Alternative 1, direct control would usually be employed only when requested and funded.

The Current Program recognizes nonlethal methods as an important dimension of IWDM, gives them first consideration in the formulation of each control strategy, and recommends or uses them when practical before recommending or using lethal methods. However, the important distinction between the Nonlethal Methods First Alternative and the Current Program Alternative is that the former alternative would require that all nonlethal methods be recommended or used before any lethal methods are recommended or used.

Alternative 4: Expanded Program Alternative (Proposed Action)

Alternative 4 is the proposed action. Following the interagency meetings, public, and agency response to public involvement, this alternative was added to the list of alternatives being considered for analysis. It is identical to the Current Program Alternative, except that it would not limit the option for lethal control to situations of human health and safety. In accordance with IWDM, this alternative would continue all aspects of the Current Program, but with a greater emphasis on population reduction in specific problem areas where other techniques have proven ineffective. As in Alternative 1, direct control would usually be employed only when requested and funded. The summary of impacts of this alternative is discussed below under Section 6. Decision and Rationale.

Alternative 5: No Federal Program Alternative

Alternative 5 is the No Federal Program Alternative. This is not a reasonable alternative,

because it would not respond to the need for action, and would not allow WS to accomplish its mission. The No Federal Program Alternative would be no direct control or technical assistance offered or employed by WS. The environmental consequences of this alternative would be uncertain but would be likely to be less desirable than the action alternatives.

Alternatives Eliminated from Further Consideration

The following alternative was evaluated and eliminated from further consideration:

The Lethal Methods Only Alternative would have required WS to attempt to eliminate resident Canada geese from the area. This alternative was requested in ten letters received during the public involvement process, but was eliminated as being unrealistic and socially unacceptable. It would not comply with IWDM and would have probable unacceptable environmental impacts on the issues identified.

5: Public Involvement

Solicitation for Input, Information, and Issues:

Consulting agency planning meetings and discussions were held with agency personnel, the U.S. Fish and Wildlife Service (USFWS), and the Washington Department of Fish and Wildlife (WDFW), to develop an initial public involvement letter soliciting public input. Three hundred seventy-seven public involvement letters were sent to state, federal, county, and municipal agencies, businesses, animal welfare and animal rights organizations, and individuals. The public involvement letter invited information concerning the issues and alternatives involving resident Canada goose damage. Seventy-one letters were received in response to the invitations. The issues and alternatives identified in this process have been considered in this document.

Agency Review:

Following the public involvement process the predecisional EA was developed and presented to the consulting agencies (USFWS and WDFW) for an interagency review.

Public notice of Availability:

Legal notices of availability were placed in; *The Seattle Times*, *The Bellingham Herald*, and *The Olympian*, on April 26, 1999. All respondents to the public involvement process and all persons requesting a document received the predecisional EA. A 30-day comment period, closing on

May 26, 1999 was offered and an additional fifteen days, closing on June 10, 1999 was granted to all who requested an extension.

In excess of 350 predecisional EAs were issued and 139 comment letters were received. A data base and mailing list of 625 interested persons, groups and agencies were involved in this process.

Most of the comments received on the predecisional EA did not provide new and substantive information, since early interagency coordination and the first public involvement process revealed most concerns. Because none of the comments provided new information that substantially changed the analysis, a major revision of the EA was not necessary. Some of the more important comments are reflected in this decision document where WS felt there was a need for clarification. Because of the volume of comments showing a variety of perspectives, WS has chosen to represent the types of comments that were received by summarizing and responding to each type. These comments and responses are attached in Appendix A.

This Decision Notice and FONSI is being mailed to all people who have provided written input during any phase of the EA or who have otherwise expressed interest in this EA. In addition, a notice will be published in the newspapers identified above.

6. Decision and Rationale

After carefully reviewing the EA, I believe that the need for action and issues identified in the EA are best addressed by implementing the Proposed Action alternative (the Expanded Program). The EA analyzed five alternatives to address resident Canada goose damage management in the Puget Sound area: the Current Program Alternative (No Action); a Non-lethal and Technical Assistance Only alternative; a Nonlethal Methods First alternative; an Expanded Program (Proposed Action) alternative, and a No Federal Program Alternative.

The alternative allows WS to provide both technical assistance and direct control services including both nonlethal and lethal management approaches. It allows the use of practical and effective methods of preventing or controlling damage while minimizing harmful effects of control measures on humans, other species and the environment. The Proposed Action is similar to the Current Program, but will have a greater emphasis on removing geese where other techniques are determined to be ineffective or not practical. Nonlethal methods would be given first consideration in the formulation of each damage management strategy, and would be recommended or implemented when practical and effective before recommending or implementing lethal methods. All wildlife damage management activities will be conducted in a

manner consistent with all applicable environmental regulations and agency policies.

Environmental Consequences:

Humaneness: The Proposed Action will employ the most humane methods available that are also practical and effective. More lethal control will be used under this alternative, which may be seen as less humane by some people. Some people view the capture and killing of geese as inhumane, regardless of the methods used. Others feel that unchecked damage from an expanding goose population will necessitate more killing in the future, therefore, less lethal control sooner rather than more lethal control later is more humane in the long run.

Impacts on nontarget, threatened and endangered species: No significant impact is expected. Lethal control methods proposed are highly target selective. The USFWS has concurred that the Proposed Program will have no effect on the Federally listed bald eagle, Aleutian Canada goose, brown pelican, marbled murrelet, northern spotted owl, peregrine falcon, or western snowy plover.

Impacts on resident Canada geese: The Proposed Program will be likely to reduce localized numbers of geese. Continued growth of the population in the Puget Sound area may be slowed, delayed, or halted. The number of geese taken will not exceed management objectives set by the State, with not more than 3,500 taken the first year of the program. There will be no significant impact on the statewide population.

Program impacts on aesthetic values and public viewing opportunities: There will continue to be ample viewing opportunities. Aesthetic values are subjective, but presumably, fewer damage problems with geese will increase their aesthetic appeal for many people. Some locations will have fewer geese.

Program Effectiveness: The Proposed Action is considered to be the most effective of the alternatives in reducing damages. The Proposed Action will allow WS to most effectively assist the public in resolving damage problems with resident Canada geese.

Cumulative Impacts: The Proposed Action will not contribute to significant cumulative impacts on the resident Canada goose population in the Puget Sound area. WS activities will be monitored, and WS will coordinate all lethal control with WDFW and USFWS to ensure that removals will not exceed the minimum threshold index as established by these agencies. USFWS and WDFW waterfowl managers concur that the Proposed Action will

FINDING OF NO SIGNIFICANT IMPACT

A careful review of the Washington Wildlife Services EA indicates that there will not be a significant impact on the quality of the human environment as a result of this proposal. I agree with this conclusion, and therefore, determine that an Environmental Impact Statement (EIS) will not be prepared. This determination is based on consideration of the following factors:

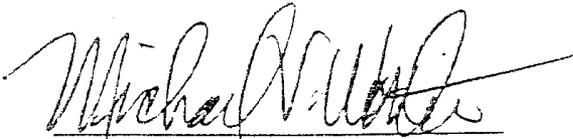
1. The proposed activities will occur in isolated or localized areas within the Puget Sound area and only where a request for assistance is directed to Wildlife Services. The proposed activities are not national or regional in scope.
2. The proposed activities will not significantly affect public health and safety. The need for action is partially based on protecting human health and safety. The proposed program would be likely to have a beneficial impact on human health and safety through a reduction in the likelihood of bird aircraft strikes, and potential disease transmission to humans. It would reduce the disruption of vehicular traffic, attacks on children and other vulnerable people, and it would reduce transmission of pathogens to food processing facilities. The methods used to control resident Canada geese are highly target specific and are not likely to affect public health and safety.
3. The proposed activities will not have an impact on unique characteristics of the geographic area such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas. The nature of the methods proposed for alleviating damages would not likely affect the physical environment.
4. The effects on the quality of the human environment of the proposed activities are not highly controversial. Although some people are opposed to some aspects of waterfowl damage management, the methods and impacts are not controversial among experts.
5. The possible effects of the proposed activities on the quality of the human environment are not highly uncertain and do not involve unique or unknown risks.
6. The proposed activities do not establish a precedent for actions with future significant effects or represent a decision in principle about a future consideration.

Decision and Finding of No Significant Impact
Management of Conflicts Associated with Non-Migratory (resident) Canada Geese in the Puget Sound Area

For additional information concerning this decision, please contact:

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Approved By:



Mike Worthen
Western Region Director
USDA-APHIS- Wildlife Services

11-14-99

Appendix A
Response to Comments
to the

Environmental Assessment for the Management of Conflicts Associated with Non-migratory (resident) Canada Geese in the Puget Sound Area.

Wildlife Services (WS) received 141 comment letters on the Pre-Decisional EA. One-hundred-twenty of the commenters expressed an opinion on the Proposed Action or on the topic of lethal control. Over 80% of the Washington residents who responded were in general favor of increasing the option of lethal control as stated in the Proposed Action (Alternative 4). A sizeable number of comments were also received from groups or individuals outside Washington. Many of these comments were opposed to any alternative which incorporated the lethal control of geese as an option. When all formal comments were considered, the Proposed Action was favored by a two to one margin.

Despite the apparent public support of the Proposed Action, NEPA analysis is not based on the popularity of an issue. Proper consideration must be given to all reasonable points of view, particularly as they may relate to the issues being considered. In this light, it is important to consider and address concerns or criticisms that may arise. Appendix A is a summary of comments, particularly criticisms and concerns, received on the Pre-Decisional EA, with the corresponding WS responses.

Purpose and Need:

Some questioned WS's account of the origins and history of Canada geese in the Puget Sound area.

A. WS attempted to use the best information available to describe in general terms the history and possible origins of resident Canada geese in the Puget Sound area. This was done to inform the reader and to describe the distinction between migrant geese and the Puget Sound population of resident geese.

Not all damage claims were verified, and the dollar value of goose damage was overstated. The data should not be used.

A. WS used program records to compile damage estimates. When people contact WS for assistance they frequently provide estimated costs of damage. For instance, King County Park System reported spending \$45,947 to dilute feces-polluted water, \$8,552 to employ dog handlers to haze geese, and approximately \$65,000 to clean up goose feces for a total of \$121,499. WS does not have the resources, responsibility, or authority to verify all damage reports. Although not comprehensive, the summary of these records represented the best information available, even though it most likely underestimated the total damage caused by geese. Damage reports were received from individuals; businesses; state, county, and municipal governments; Federal agencies; and others.

People who contacted WS for assistance over-reported goose damage for the purpose of collecting damage compensation.

A. WS offers no compensation for goose damages. There is no program that offers compensation for goose damages in Washington.

Public involvement was biased. How was the mailing list developed?

A. The mailing list was developed according to agency policy to inform interested individuals and groups of the proposed action. The list included groups and individuals, local, state and federal government agencies, and members of the public who had shown interest in wildlife issues such as those in this EA. A concerted effort was made to seek out animal rights organizations and others historically opposed to wildlife management. A legal notice of availability of the Pre-decisional EA was posted in area newspapers. The EA received media attention, and anyone who expressed interest in commenting on the EA was added to the mailing list. The current mailing list has 635 entries.

Extend public comment period by 60 days.

A. All persons requesting an extension were granted a 15-day extension past the 30-day comment period.

Why did WS fail to include the Renton Airport experimentation with Turf Shield that apparently has been quite successful?

A. Methyl anthranilate, the active ingredient in Turf Shield was discussed in the EA (section 3.1.5). There was a serious goose hazard reported at the Renton Airport. Turf Shield was one of the methods used there during the time the EA was being prepared. Results of the application were ambiguous.

The EA fails to mention the previous failure of lethal methods at Clarkstown, NY and the success of the use of border collies and other non-lethal methods.

A. According to officials associated with the goose problem in Clarkstown NY, lethal control reduced the number of geese and, when used, was effective in resolving the community's overall goose problem (Holbrook, pers. comm., Chipman, pers. comm.). The EA acknowledges effectiveness of non-lethal methods which are discussed in section 3.1.5 of the EA.

A site-specific analysis should be made in the EA for every location where goose damage

management may occur.

A. WS has determined that its analysis is adequate, because further site specific information would not change the analysis, add to the public's understanding of the proposal, or provide additional useful or relevant information to the Decision maker.

The underlying intent for preparing any EA, as defined under CEQ NEPA regulations is to determine if a proposed action might have a significant impact. This EA process has been issue driven, meaning issues that were raised during the interdisciplinary process and through public involvement that were substantive, were used to drive the analysis and determine the significance of the environmental impacts of the proposal and its alternatives. Therefore, the level of site specificity must be appropriate to the issues listed. The substantive issues analyzed were humaneness of methods, impacts on non-target species, impact on the resident goose population, aesthetic value of geese and the effectiveness of control measures.

WS has exceeded compliance with NEPA by following the guidance established in Section 1508.9, which state that an environmental assessment is "...a concise public document..." that "...briefly provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact." and includes "...brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E), of the environmental impacts of the proposed action and alternatives, and a listing of agencies and person consulted."

The EA has resulted in a Finding of No Significant Impact, after WS considered both the context and intensity of the potential impacts to determine significance (Section 1508.27):

The context in which goose damage management impacts could occur are largely limited to the resources (people, property, non-target species, and the goose population) within the Puget Sound area. However, certain members of society at large may be concerned with some issues and impacts in Puget Sound, (for example; humaneness, goose population viability, air traffic safety in Puget sound, and impacts on threatened and endangered species) even if they do not reside in the Puget Sound area. Because less tangible issues such as social values for wildlife are more widespread, WS considers them in the broader context. However, the more tangible effects are on properties surrounding the Puget Sound, and people who live in the Puget Sound area.

In determining the intensity (the severity) of impacts, WS evaluated the proposal against the ten criteria established in Section 1508.27 (see the FONSI section for a complete list of items that could trigger significance). WS found that the degree to which the proposal could trigger the criteria was low to nonexistent. For example, "...The degree to which the action may adversely affect an endangered or threatened species or its habitat..." and "...whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment" was low to nonexistent.

The analysis in this EA was driven by the issues raised during the NEPA process, and the impacts of the proposal were determined to be not significant after examination in light of both the context and intensity of the impacts, as defined by CEQ. More detailed site specific information would not contribute to the public's understanding of the proposal, nor would it change the analysis and result in substantially differing environmental consequences. Also, further site-specific analysis would provide no additional useful information to the Decision-maker.

In addition to the analysis contained in the EA, WS personnel use the WS Decision Model (Slate et al. 1992) as a site specific tool to develop the most appropriate strategy at each location. The WS Decision Model is an analytical thought process used by WS personnel for evaluating and responding to wildlife damage management requests. When a request for assistance is received and after consultation with the requester, WS personnel evaluate the appropriateness of strategies, and methods are evaluated in the context of their availability (legal and administrative) and suitability (based on biological, economic and social considerations). Following this evaluation, the methods deemed to be practical are formed into a damage management strategy for the situation. For example, on most properties, wildlife damage may occur whenever food, water and habitat for the damaging species are present. WS personnel and the property owner/manager monitor and reevaluate the situation to devise the most effective solution. If one method or combination of methods fails to stop damage, a different strategy or a modified strategy may be implemented. If the strategy is effective, the need for damage management is ended but monitoring continues. In terms of the WS Decision Model, most damage management efforts consist of a continuous feedback loop between receiving the request, implementing a strategy and monitoring the results.

Geese affect relatively few people. Those who consider geese a problem are in the minority of area residents.

A. Wildlife damage in general tends to affect relatively few people, compared to the population. However, those people affected can incur substantial damage. It is sometimes difficult for people not affected to understand the needs of those people affected.

The statement that few area residents consider geese a problem was not substantiated, nor was it consistent with public input. Through the letters, phone calls, and media attention that this issue generated, area residents indicated a fairly broad awareness and concern about the problems being caused by Canada geese. In an independent poll conducted by the Town of Hunts Point in July 1998, 96 percent of homeowners wanted the goose population controlled or reduced. Of the Washington State respondents who provided comment on the Pre-Decisional EA, over 80 percent supported using lethal control in managing goose problems. In the Seattle and Lacey/Olympia areas, problems with resident geese have been great enough to warrant the formation of community-based waterfowl management committees. WS takes an active role in both of these committees along with community leaders, wildlife officials, wildlife advocates, and others.

WS should conduct a public opinion poll for humaneness.

A. WS solicited public comment on the issue of humaneness in the Public Involvement letter and in the review of the Pre-Decisional EA. When lethal control is necessary, WS uses the most humane methods available.

The EA did not adequately explain how WS determined whether the problem geese were resident or migratory. Concern that migratory geese may be killed. WS should have analyzed population trends of migratory geese.

A. WS uses the definition of the U.S. Fish and Wildlife Service: resident geese are those that nest and/or reside predominately within the conterminous United States (page 5). Population trends of migratory geese were not analyzed, because the proposed action would not affect migratory geese. Migrant geese would not be affected, because: a) control actions would coincide with damage situations which mostly occur at times of the year that migrant geese are not present (spring and summer); b) efforts would be made at all times of the year to avoid the take of migrant geese (many of the migrant subspecies which visit Washington are physically distinguishable from the resident Western Canada goose).

The information regarding public health risks associated with Canada geese is wrong. There is no proof that goose droppings are unsanitary or that they pose any substantial risk to human health.

A. WS reviewed the wildlife literature to provide a brief summary of health risks associated with Canada geese. According to the literature, the risk of healthy human adults contracting many of the diseases appears to be low (page 7). However, it also appears that a certain level of risk does exist, particularly for some segments of the human population (page 9). As stated in the EA, Health Departments have closed a number of area beaches over the last several years primarily due to fecal contamination by geese and other waterfowl and to levels of e. coli contamination which exceeded public health standards (page 7). WS recognizes and defers to the authority and expertise of health officials in determining what does or does not constitute a threat to public health. Revised Code of Washington (RCW) 70.05.60 and 70.05.70.

Human health problems should not need to be proven before lethal control can be implemented.

A. Alternative 4, the Proposed action, allows lethal control for reasons other than human health-hazards.

WS overestimated the fecal output of a goose (3 lbs./day). Goose feces is mostly water, and the estimate was used to falsely cause alarm. Goose feces is a good fertilizer.

A. No alarm was intended. WS used an estimate for lesser Canada geese from USDI, March 1998, EA Canada Goose Population Management in Anchorage, AK page 6. A number of factors may affect fecal output, including the size of the goose and the type and amount of forage being consumed. Subspecies of Canada geese vary greatly in size. The western Canada goose is the second largest subspecies and would be expected to produce a greater volume of feces than would a smaller subspecies. Kear (1963) recorded a maximum fecal deposition rate for Canada geese of 175 g (.39 lb.)/bird/day dry matter. Regardless of the estimated daily output, fecal contamination was the most common complaint received from the public. Because of the water content, goose feces creates a slipping hazard. If applied properly, goose feces could be used as a fertilizer. However, goose droppings are often concentrated in undesirable locations and in such quantities as to actually kill vegetation and pollute water resources.

The Current Program has been inadequate in resolving goose damage. Problems continue to worsen.

A. The majority of Puget Sound residents who commented expressed similar concerns.

Wildlife agencies contribute to the problem by luring, relocating, or husbanding geese or egg clutches in the Puget Sound area to provide hunting opportunities.

A. Although geese were originally introduced into the Puget Sound area by wildlife agencies in the late 1960's, no further efforts have been made by the Washington Department of Fish and Wildlife (WDFW) for more than twenty years (Kraege pers. comm.). The U.S. Fish and Wildlife Service (FWS) operates several refuges which provide habitat and may attract both resident and migrant geese and other waterfowl (Nisqually, Dungeness, and Protection Island). While hunting is allowed on some refuges, none are operated for the express purpose of hunting. The FWS and WDFW are aware of the growing problems caused by resident Canada geese and are consulting agencies on this EA.

The text on page 6 does not match the data shown in Figure 2.

A. A typographical error appeared where Figure 2 was referenced on page 6 (under "Expanding Population"). It has been corrected to read "growing to 5,591 geese by 1997".

According to the EA, WS would remove 25% of the goose population.

A. It is rarely possible for wildlife biologists to know exactly how many animals are in a given population. Therefore, they must rely upon surveys to better understand population trends. Population trend indices, such as those shown in the EA in Figures 1 and 2, are routinely used by wildlife biologists. They are not population estimates; they are used only as indicators of increases or decreases in wildlife populations. WS used population trend data to determine that the population of resident Canada geese is rapidly growing in the Puget Sound area. Population trend indices will continue to be used to monitor the status of resident goose populations.

The EA contains the WDFW management objectives for western Canada geese in the Puget Sound area (page 34). In the event that 25% of the population were removed no significant impact would ensue. Canada goose populations can withstand imposed adult mortality rates of over 40% whilst maintaining or increasing their total population size (Allan et al. 1995).

Relocating geese would not impact other wildlife. The American Association of Wildlife Veterinarians (AAWV) recommendation that waterfowl not be relocated has been withdrawn.

A. The position of the AAWV is stated in the EA (page 9), was verified, and has not been withdrawn.

Bird damage to aircraft is an operating cost of flight. There is no way to fully eliminate the risk to aircraft. Airports attract geese by mismanagement. Bird strike claims don't support a need for action. FAA is not concerned with air traffic safety.

A. Considering the risk to human life as well as the expense of repairs, it is evident that every effort should be taken to reduce the occurrence of bird strikes. WS works closely with FAA and numerous airports in offering an Integrated Wildlife Damage Management approach to reducing wildlife hazards. Based on an analysis of bird strike statistics throughout the U.S., geese were ranked first in mean cost per strike (Dolbeer 1999).

Why do only resident (not migratory geese) pose a threat to airport safety?

A. Migratory geese may also threaten air safety. However, they have not posed nearly the problem in Puget Sound that has been posed by resident geese. This EA specifically examines resident Canada geese. WS is not proposing to manage populations of migrant geese.

The proposed action would violate the Migratory Bird Treaty Act (MBTA).

There have been at least three judgements issued in federal courts over the last 2 years with somewhat differing opinions regarding the authority of USFWS to issue MBTA permits to other federal agencies (Newton County Wildlife Association vs U. S. Forest Service, Sierra Club vs Martin, HSUS vs USDA). WS makes every effort to work within all applicable laws, regulations, and guidelines. In order to ensure federal compliance, WS will obtain MBTA permits covering management activities that involve the taking of species for which such permits are required in accordance with the MBTA and USFWS regulations, or will operate as a named agent on MBTA permits obtained by cooperators.

The EA fails to address issues required under NEPA.

A. The commenter did not identify what issues WS failed to address. WS has made every effort to fully comply with NEPA and produce an adequate document (Eccleston 1995).

Banding study of resident geese in Washington is not legitimate. There is no proof that relocated geese caused problems in other communities.

A. WS attempted to use the best information available. Information from banded geese has established that particular birds were year-round residents (page 6).

Some banded birds relocated from western WA to other areas were found to return, most banded birds were found to stay in the area to which they were relocated (page 25).

Relocated geese are known to have caused damage. Birds banded by WS, relocated from western WA to eastern WA and ID were later found to be taking up residence in urban areas causing similar damage in their new locations (page 25).

Alternatives:

The EA does not consider the full range of alternatives and it dismisses all but lethal methods.

A. No additional alternatives were identified through the public involvement process. All alternatives in the EA were given thorough consideration. The EA does not dismiss nonlethal methods. To the contrary, nonlethal methods are an integral part of both the Current and Proposed actions.

Include an alternative that uses volunteers and community organizations to assist in managing geese.

A. Volunteers and community organizations are allowed under all alternatives.

There should be a public education or technical assistance alternative.

A. Public education and technical assistance is an integral part of all stated alternatives with the possible exception of the No Federal Program Alternative.

Goose populations are cyclical, the problem will resolve itself.

A. Resident goose populations in the Puget Sound area have not reached the carrying capacity of the environment (page 19). Problems are expected to increase as goose numbers increase. Hoping that the problem will resolve itself is not a reliable nor a reasonable solution.

Nonlethal methods (dogs, repellants, falcons, etc.) are sufficient to resolve damages.

A. The EA analyzes a "Nonlethal and Technical Assistance Only" program in Alternative 2 (pages 27 and 28). Nonlethal methods are an integral part of all stated alternatives, with the

possible exception of the No Federal Program Alternative. There are no known locations with a history of goose damage at or approaching the level experienced in the Puget Sound area where nonlethal methods alone have been adequate in resolving damage.

Let people trap or catch and kill geese and eat them. Put a bounty on geese. Just remove protections on geese. Declare open hunting on geese.

A. Geese are managed by the USFWS and protected under the Migratory Bird Treaty Act. These types of actions are closely regulated or prohibited.

Environmental Consequences:

Habitat alteration is necessary, turf grass is the problem. WS needs to require habitat modification.

A. The EA recognizes that urban habitats are attractive to geese and that habitat modification is one of the more effective methods (page 21), especially when used in conjunction with other techniques. Under all alternatives, except No Federal Program, WS would make recommendations for possible habitat modification. However, WS does not have the authority to require private citizens or municipalities to alter their property, nor are habitat modifications always practical.

Killing geese is trivialized while the nuisance of feces is shed in an emotional light.

A. WS recognizes that the killing of any animal is an emotional issue for some people.

WS has not given any consideration of the perspective of the animals themselves. Humaneness refers to suffering from interference with goose family relationships, terror/trauma of being trapped and drugged, and torture of being slaughtered.

A. While many people may speculate on the feelings, emotions, and general perspectives of animals, there is no known standard for measuring these potential variables. WS uses humane methods established by the American Veterinary Medical Association and makes every effort to minimize pain and suffering.

There is no discussion of how much citizens and taxpayers are going to have to pay for this action.

A. Funding of control actions was discussed on page 6 of the EA (Section 1.4), page 15 (Section 2.1) and on page 31 (Section 3.4.3). The cost for the proposed actions would be reimbursed by those persons or organizations receiving assistance.

There is no proof that individuals might impact target and non-target species or that

actions taken by individuals might be less humane than those taken by WS.

A. Failure to provide reasonable and prudent solutions to wildlife depredations can lead to individuals attempting solutions which may be ecologically harmful and biologically irrational. It is intuitive that allowing the public at large, rather than trained professionals, to manage wildlife would pose a greater risk to wildlife. WS acts as a protective buffer, guarding not only human enterprise from damaging conflicts with wildlife, but also protecting wildlife and the environment by reducing animosity and frustration at the human/wildlife conflict zone. News stories about geese being poisoned or shot with arrows, darts, guns, etc. are common in the Puget Sound area, as well as elsewhere across the country. It is likely that many of these incidents are indicative of a frustrated public taking independent action.

The EA is not concise. Does not allow reader to determine impact on environment.

A. The conclusions are logically drawn and illustrated in the sections on environmental consequences. Further clarification is made in this section for specific questions and criticisms. A full review of the comments has not indicated that there is a need to make substantial additions or changes to the analysis.

An EIS should be prepared.

A. An EIS is not required unless there may be a significant impact on the environment. This EA has resulted in a Finding of No Significant Impact, through a NEPA process that went beyond minimum requirements to comply with CEQ and APHIS agency implementing regulations.

Was this EA optional?

A. Individual management actions of this kind may be categorically excluded under the APHIS NEPA regulations. However, an EA is normally required for a multi-action proposal such as the one analyzed in this document. The EA helps the agency to comply with its own regulations, and has the other benefits as stated in the EA.

Lethal methods should not be paid for with federal funds, are not effective, and are not cost efficient.

A. Few if any federal funds would be used in providing direct control activities to alleviate resident Canada goose damage in the Puget Sound area. The persons or organizations requesting assistance would be required to pay for project costs.

WS disagrees with the statement that lethal control is not effective or cost efficient. See discussion in Section 3.1.5 of the EA. Relocation efforts were proven effective at reducing damage (pp. 24-25), however relocation is no longer an option. Replacing relocation with lethal

control would be expected to be more effective due to the elimination of that portion of relocated geese that returned.

Some comments challenged the effectiveness of the proposed action, some (mostly local residents) demanding more lethal action or extermination and others (mostly out-of-state) demanding less or none.

A. The proposed action was developed due to the ineffectiveness of the Current Program to adequately resolve goose damage. The Current Program uses the full range of nonlethal measures plus minimal population control. No new methods to improve effectiveness were identified in the public participation process. The proposed action would maintain the full range of nonlethal measures and would increase lethal control. WS will support the most humane, selective, and effective control techniques available.

How will you know if killing geese is effective?

A. Areas where geese were removed would be monitored. A reduction in the amount of damage at or near the site where lethal control methods were employed would indicate effectiveness.

If nonlethal methods are ineffective, why does WS still recommend their use?

A. Nonlethal methods have a wide range of effectiveness depending on the circumstances of each situation. They are an important component of every alternative analyzed with the possible exception of the No Federal Program Alternative.

Geese will just repopulate the areas where they are lethally removed.

A. Long-term repopulation of sites is a concern (page 32). Site faithfulness, particularly in females, is likely to slow the spread of Canada Geese to new locations (Allan et al. 1995). In addition, WS would continue to offer technical assistance to property owners on actions they could take to reduce the attractiveness of areas to geese. However, population management would continue to be an integral part of the program and would be used within the confines of the Proposed Action where needed.

Lethal methods are inhumane, WS has ignored the animal rights argument and the aesthetic value of geese.

A. WS recognizes that there is a range of opinions concerning aesthetics, humaneness, and whether animals have rights. It is not up to WS to say one set of values is right and another is wrong. WS needs to recognize that each of the values exists (Section 3.1.4 page 20) and then, within the biological, social, and political climate, decide the best course of action given the program's mission and charge from Congress.

The EA caters excessively to the viewpoints of animal rights groups. Such a small number of vocal activists should not be able to dictate the outcome of the EA.

A. It is WS policy and a requirement of NEPA that all views be considered.

WS Decision Model is vague and subjective. Too much reliance on professional opinion, where criteria could be offered. Do not trust government to use problem solving method.

A. The Decision Model (Appendix 3) is used in the field to assess and resolve individual damage situations. Professional opinion is based on training, experience, goose biology, legal parameters, agency policies, and other factors. Because each damage situation is unique and involves different variables, a specialist in the field must determine which particular method(s) would be most appropriate to use at each location. Methods should be evaluated in the context of their legal and administrative availability and their acceptability based on biological, environmental, social, and cultural factors.

Donate goose carcasses to charities.

A. Goose carcasses may be donated to food banks, charities, educational or scientific institutions, Federally recognized tribes, public institutions, other non-profit organizations. Carcasses may also be donated to zoos or wildlife rehabilitation centers. Carcasses that are not donated will be incinerated or buried.

Donating goose carcasses to charitable organizations presents a threat to human health.

A. There is very low risk of human health effects associated with the consumption of goose meat (Miller 1998). Any geese taken under circumstances that might pose a threat to the suitability of the carcass for human consumption would not be donated (Section 2.1, page 16).

What are the impacts on geese after the first year? What are the cumulative impacts on geese and when would it be considered significant?

A. No significant cumulative impacts are likely in the first year or those that follow. Impacts on the goose population would be considered significant if the minimum threshold index (WDFW Western Canada goose management objectives for Puget Sound area, Section 3.6, page 34) was met.

Conclusion:

There is an over population problem. To delay lethal control would result in the need to

take more geese at more cost and suffering in the future.

A. Wildlife managers agree with this statement. However, lethal control would only be used by WS when necessary to stop damage.

Lethal control now to control the population will make nonlethal control more effective.

A. WS agrees with this statement.

How will WS determine when lethal control is warranted?

A. When nonlethal methods are found to be ineffective or inappropriate, lethal methods will be recommended. It is the decision of the resource owners or their representatives whether to accept, reject, or seek modification of the WS recommendations.

WS may recommend lethal control in response to:

Human health hazards - (hazards determined by health departments or other qualified officials)

Wildlife strike hazards at airports - (hazards determined by WS, FAA, or airport officials)

Traffic hazards - (hazards determined by WS, law enforcement officials, or other qualified local, state, or federal officials)

Physical attacks and other safety hazards - (hazards determined by WS, resource owner, or other qualified officials)

Property damage - (extent of damage and need for lethal control determined by WS using the ADC Decision Model and considering the methods, issues, and impacts evaluated in the EA)

Preparers, Reviewers and Persons Consulted:

The names of persons consulted were not listed in the References section.

A. WS consulted closely with both State and Federal wildlife management officials and other experts. All persons referenced in the EA are listed in section 5.2, Reviewers and Persons Consulted (page 38).

References:

References cited in the EA are not valid and accurate.

A. WS conducted an extensive literature review and made a good faith effort to use the best available information. A large majority of the references were from professional, peer-reviewed, scientific journals.

Persons Consulted:

Chipman, Richard - WS, State Director, NY

Holbrook, Charles - City councilman for Clarkstown, NY

Kraege, Don - WDFW, Section Waterfowl Manager

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