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ENVIRONMENTAL ASSESSMENT

REDUCING ROCK DOVE, EUROPEAN STARLING, AND HOUSE SPARROW DAMAGE IN IOWA

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SUMMARY OF PROPOSED ACTION

The United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (WS) proposes to continue the current bird damage management program that responds to feral pigeon (*Columbia livia*), European starling (*Sturnus vulgaris*), and house sparrow (*Passer domesticus)* damage in the State of Iowa. An Integrated Wildlife Damage Management (IWDM) approach would be implemented to reduce damage activities to property, agricultural resources, livestock, and public health and safety. Damage management would be conducted on public and private property in Iowa when the resource owner (property owner) or manager requests assistance. An IWDM strategy would be recommended and used, encompassing the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, WS could provide technical assistance and direct operational damage management, including non-lethal and lethal management methods by applying the WS Decision Model (Slate et al. 1992). When appropriate, physical exclusion, habitat modification or harassment would be recommended and utilized to reduce damage. In other situations, birds would be removed as humanely as possible using: shooting, trapping, and registered pesticides. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy.

ACRONYMS

ADC	Animal Damage Control*
APHIS	Animal and Plant Health Inspection Service
AVMA	American Veterinary Medical Association
BDM	Bird Damage Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FDA	Food and Drug Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FY	Fiscal Year
IDALS	Iowa Department of Agriculture and Land Stewardship
IDNR	Iowa Department of Natural Resources
IWDM	Integrated Wildlife Damage Management
MBTA	Migratory Bird Treaty Act
MIS	Management Information System
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
SOP	Standard Operating Procedure
T&E	Threatened and Endangered
TGE	Transmissible Gastroenteritis
USDA	U.S. Department of Agriculture
USDI	U.S. Department of Interior
USFWS	U.S. Fish and Wildlife Service
WS	Wildlife Services

***NOTE:** On August 1, 1997, the Animal Damage Control program was officially renamed to Wildlife Services. The terms Animal Damage Control, ADC, Wildlife Services, and WS are used synonymously throughout this Environmental Assessment.

CHAPTER 1: PURPOSE AND NEED FOR ACTION

1.0 INTRODUCTION

Across the United States, wildlife habitat has been substantially changed as human populations expand and land is used for human needs. These human uses and needs for resources often overlap with those of wildlife which increases the potential for conflicting human/wildlife interactions. In addition, segments of the public desire protection for all wildlife; this protection can create localized conflicts between human and wildlife activities. The *Animal Damage Control Programmatic Final Environmental Impact Statement* (EIS) summarizes the relationship in American culture of wildlife values and wildlife damage in this way {United States Department of Agriculture (USDA) 1997}:

> "*Wildlife has either positive or negative values, depending on varying human perspectives and circumstances . . . Wildlife is generally regarded as providing economic, recreational and aesthetic benefits . . . and the mere knowledge that wildlife exists is a positive benefit to many people. However . . . the activities of some wildlife may result in economic losses to agriculture and damage to property . . . Sensitivity to varying perspectives and value is required to manage the balance between human and wildlife needs. In addressing conflicts, wildlife managers must consider not only the needs of those directly affected by wildlife damage but a range of environmental, sociocultural and economic considerations as well.*"

Wildlife damage management is the science of reducing damage or other problems caused by wildlife and is recognized as an integral part of wildlife management (The Wildlife Society 1990). Wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992). The USDA, Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program (formerly known as Animal Damage Control) is the Federal agency authorized by congress to aid in the protection of the Nation's agricultural and other resource from damage caused by wildlife (Section 1.6.1). WS activities are conducted to prevent or reduce wildlife damage caused to agricultural, industrial and natural resources; property; livestock; and threats to public health and safety on private and public lands in cooperation with federal, state and local agencies, private organizations, and individuals. The need for action is derived from specific damage or threats to resources or the public. The imminent threat of damage or loss of resources is often sufficient for individual actions to be initiated. WS uses an Integrated Wildlife Damage Management (IWDM) approach, known as Integrated Pest Management (WS Directive 2.105[1]), in which a combination of methods may be used or recommended to reduce wildlife damage. IWDM is described in Chapter 1:1-7 of USDA (1997). These methods may include alteration of cultural practices and habitat and behavioral modification to prevent or reduce damage. The reduction of wildlife damage may also require that individual animals be removed or local populations be reduced through lethal means.

Normally, according to the APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions could be categorically excluded {7 CFR 372.5(c), 60 Fed. Reg. 6,000 -6,003, (1995)}. WS has decided in this case to prepare this Environmental Analysis (EA) to facilitate planning, interagency coordination, the streamlining of program management, and to clearly communicate with the public the analysis of individual and cumulative impacts. This EA documents the analysis of the potential environmental effects of a proposed rock dove (*Columbia livia,* hereafter pigeon), European starling (*Sturnus vulgaris*, starling), and house sparrow (*Passer domesticus*, sparrow) damage management (BDM) program. This analysis relies mainly on existing data contained in published documents (Appendix A), including the *Animal Damage Control Program Final Environmental*

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[1] WS Policy Manual - Provides guidance for WS personnel to conduct wildlife damage management activities through Program Directives. WS Directives referenced in this EA can be found in the manual but will not be referenced in the Literature Cited Appendix.

Impact Statement (USDA 1997). The final environmental impact statement (USDA 1997) may be obtained by contacting the USDA, APHIS, WS Operational Support Staff at 4700 River Road, Unit 87, Riverdale, MD 20737-1234.

1.1 PURPOSE OF THIS EA

The purpose of this EA is to address and evaluate the potential impact to the human environment from alternatives for reducing crop and property damage and risks to human and livestock health and safety caused by European starlings, rock doves and house sparrows in Iowa.

1.2 DECISION TO BE MADE

Based on agency relationships, and legislative mandates, WS is the lead agency for this EA, and therefore responsible for the scope, content and decisions made. The Iowa Department of Natural Resources and Iowa Department of Agriculture and Land Stewardship were consulted during preparation of the EA to ensure an interdisciplinary approach in compliance with NEPA and agency mandates, policies, and regulations.

Based on the scope of this EA, the decisions to be made are:

- How can WS best respond to the need to reduce damage and health risks caused by starlings, pigeons and sparrows?
- What are the environmental impacts of implementing various management strategies?
- Does the proposal have significant impacts meriting an EIS?

1.3 NEED FOR ACTION

The need for action in Iowa is based on requests for assistance in reducing risks to human and livestock health and safety and damage to agricultural resources and property by pigeons, starlings, and sparrows. Comprehensive surveys of pigeon, starling, and sparrow damage in Iowa have not been conducted.. However data on requests to WS for assistance with starling pigeon and sparrow data are available and are summarized in Table 1-1. These data represent only a portion of the total conflicts with pigeons, starlings, and sparrows in Iowa, because not all people who experience damage request assistance from WS. WS' database does not include requests received or responded to by local, State or other Federal agencies, and it is not a complete database for all wildlife damage occurrences. Although the number of requests for assistance does not necessarily reflect the extent of need for action, these data do provide an indication of the nature of the damage problems caused by these species in Iowa.

Table 1-1. Number of requests for technical assistance from Iowa Wildlife Services by year. [1]

Fiscal Year	Species	Agriculture	Property[2]	Health & Safety	Total
1999	Pigeon	0	4	1	5
	Starling	0	3	4	7
	Sparrow	0	1	0	1
2000	Pigeon	0	1	5	6

	Starling	2	4	0	6
	Sparrow	0	0	0	0
2001	Pigeon	0	1	1	2
	Starling	2	9	1	12
	Sparrow	0	0	0	0
2002	Pigeon	0	2	0	2
	Starling	1	0	0	1
	Sparrow	2	0	0	2
2003	Pigeon	0	1	0	1
	Starling	1	4	4	9
	Sparrow	0	0	0	0
Total		8	30	16	54

[1] Data presented in this table were taken from IA WS Annual Program Reports and represent the number of technical assistance projects conducted by the IA WS program and do not include data from operational projects conducted during the time period covered.
[2] To date, "property" has primarily involved buildings, bridges and grain processing plants.

1.3.1 Need for Bird Damage Management to Protect Human Health and Safety

Pigeons, sparrows, and starlings have been suspected in the transmission of 29 different diseases to humans (Davis et al. 1971, Weber 1979, Stickley and Weeks 1985). As many as 65 different diseases transmittable to humans or domestic animals have been associated with pigeons, starlings, and sparrows but the ability of these species to transmit these diseases to humans is unclear (Weber 1979). Table 1-1 shows the more typical diseases affecting humans that can be transmitted by pigeons, sparrows, and starlings. In most cases, in which human health concerns are a major reason for requesting BDM, no actual cases of bird transmission of disease to humans have been proven to occur. However, the absence of records of disease occurrence in Iowa does not mean absence of risk but may only mean lack of reliable research in this area. Few studies are available on the occurrence and transmission of zoonotic diseases in wild birds. Study of this issue is complicated by the fact that some disease-causing agents associated with birds (e.g., Salmonella), may also be contracted from other sources. WS works with cooperators on a case-by-case basis to assess the nature and magnitude the wildlife conflict including providing information on the limitations about what we know regarding health risks associated with large flocks and roosts of birds. It is the choice of the individual cooperator to tolerate the potential health risks or to seek to reduce those risks. Many property owners/managers wish to eliminate risks *before* some one actually gets sick because of conditions at their site.

The goal of agricultural and human health programs is to prevent diseases/illness from occurring. Similarly agricultural biosecurity programs are designed to prevent diseases from occurring in the first place, and, in the instance that a disease outbreak occurs or a Foreign Animal Disease is detected, to prevent the spread of the disease. The presence of large numbers of wild birds that can and do move among multiple farms can be a risk to these biosecurity efforts (Clark and McLean 2003).

The EA, and papers like Clark and McLean (2003) which reviews pathogens of agricultural and human health interest in blackbirds and Hubálek (2004) which lists pathogenic organisms in migratory birds provide an indication of the range of potential disease risks associated with wild birds. For most of these diseases, the risk of transmission from birds to humans is likely very low. The primary two human health issues related to the target species of this EA are Salmonella and Histoplasmosis.

Histoplasmosis is a fungal disease that affects the lungs which is caused by the organism *Histoplasma capsulatum*. The accumulated feces at bird roosts has long been known to be associated with the occurrence of the illness. In most instances of health risks associated with bird roosts, the roost has been in place for a period of years. The disease is generally contracted when the soil/feces below the roost is disturbed by wind on dry soil or human activity. Long term residents of areas near roosts often test positive for Histoplasma exposure. Viable *H. capsulatum* remains in the soil and can be contracted by humans years after the roost is abandoned (Clark and McLean 2003). As with many diseases, infants, young, the elderly and those with compromised immune systems are at the greatest risk of severe illness.

Salmonellosis is a well documented human and animal pathogen. In humans this organism most often results in "food poisoning" characterized by acute intestinal pain and diarrhea. Several types of the *Salmonella* bacteria are carried by wild birds with varying degrees of impact on humans and livestock. Friend (1999) reported relative rates of detection of *Salmonella* sp. in free ranging birds. *Salmonella* spp. isolates were frequent in songbirds, common in doves and pigeons, occasional in starlings, blackbirds and cowbirds, and infrequent in crows. The New York State Department of Agriculture and Markets (NYSDAM) reports experiencing increasing numbers of avian-origin Salmonella outbreaks in cattle in the state and attributes these outbreaks to the contamination of feed and facilities with fecal material. In correspondence with WS NYSDAM noted that, "The transmission of enteric pathogens represents a risk to the public and animal health directly through contact with contaminated feed and indirectly through consumption of contaminated feed." (Pers. comm., J. P. Huntley, D.V.M, M.P.H., Director, New York State Department of Agriculture and Markets).

Situations in Iowa where the threat of disease associated with starling, pigeon, or sparrow populations might occur could be:

- exposure by residents to a starling roost which has been in a residential area for more than three years;
- disturbance of a large deposit of droppings in an attic where a flock of pigeons routinely roosts or nests;
- accumulated droppings from roosting starlings, pigeons, or sparrows on structures at an industrial site where employees must work in areas of accumulation
- Sparrows or starlings nesting or loafing around a food court area of a recreational facility or other site where humans eat in close proximity to concentrated numbers of these birds.

Individuals or property owners, requesting assistance with pigeon, sparrow or starling roost problems, are often concerned about potential disease risks, but may be unaware of the types of diseases that can be associated with these birds. Concerns may also include the ability of employees to get secure hand and footholds on equipment and facilities coated in bird excrement. In most such situations, BDM is requested because the mess associated with droppings left by concentrations of birds is aesthetically displeasing and can result in continual clean-up costs. Under the proposed action, WS could provide assistance in resolving these types of problems.

Table 1-2. Diseases transmissible to humans and livestock that are associated with pigeons, starlings, and sparrows. Information from Weber (1979).

Disease	Human Symptoms	Potential for Human Fatality	Effects on Domestic Animals
Bacterial:			
Erysipeloid	skin eruption with pain,	sometimes - particularly	serious hazard for the

	itching; headaches, chills, joint pain, prostration, fever, vomiting	to young children, old or infirm people	swine industry
Salmonellosis	gastroenteritis, septicaemia, persistent infection	possible, especially in individuals weakened by other disease or old age	causes abortions in mature cattle, possible mortality in calves, decrease in milk production in dairy cattle
Pasteurellosis	respiratory infection, nasal discharge, conjunctivitis, bronchitis, pneumonia, appendicitis, urinary bladder inflammation, abscessed wound infections	rarely	may fatally affect chickens, turkeys and other fowl
Listeriosis	conjunctivitis, skin infections, meningitis in newborns, abortions, premature delivery, stillbirth	sometimes - particularly with newborns	In cattle, sheep, and goats, difficulty swallowing, nasal discharge, paralysis of throat and facial muscles
Viral:			
Meningitis	inflammation of membranes covering the brain , dizziness, and nervous movements	possible — can also result as a secondary infection with listeriosis, salmonellosis, cryptococcosis	causes middle ear infection in swine, dogs, and cats
Encephalitis (7 forms)	headache, fever, stiff neck, vomiting, nausea, drowsiness, disorientation	mortality rate for eastern equine encephalomyelitis may be around 60%	may cause mental retardation, convulsions and paralysis
Mycotic (fungal):			
Aspergillosis	affects lungs and broken skin, toxins poison blood, nerves, and body cells	not usually	causes abortions in cattle
Blastomycosis	weight loss, fever, cough, bloody sputum and chest pains.	rarely	affects horses, dogs and cats
Candidiasis	infection of skin, fingernails, mouth, respiratory system, intestines, and urogenital tract	rarely	causes mastitis, diarrhea, vaginal discharge and aborted fetuses in cattle
Cryptococcosis	lung infection, cough, chest pain, weight loss, fever or dizziness, also causes meningitis	possible especially with meningitis	chronic mastitis in cattle, decreased milk flow and appetite loss
Histoplasmosis	pulmonary or respiratory disease. May affect vision	possible, especially in infants and young children or if disease disseminates to the	actively grows and multiplies in soil and remains active long after birds have

		blood and bone marrow	departed
Protozoal:			
American Trypanosomiasis	infection of mucous membranes of eyes or nose, swelling	possible death in 2-4 weeks	caused by the conenose bug found on pigeons
Toxoplasmosis	inflammation of the retina, headaches, fever, drowsiness, pneumonia, strabismus, blindness, hydrocephalus, epilepsy, and deafness	possible	may cause abortion or still birth in humans, mental retardation
Rickettsial /Chlamydial:			
Chlamydiosis	pneumonia, flu-like respiratory infection, high fever, chills, loss of appetite, cough, severe headaches, generalized aches and pains, vomiting, diarrhea, hepatitis, insomnia, restlessness, low pulse rate	occasionally, restricted to old, weak or those with concurrent diseases	in cattle, may result in abortion, arthritis, conjunctivitis, and enteritis
Q Fever	sudden pneumonitis, chills, fever, weakness, severe sweating, chest pain, severe headaches and sore eyes	possible	may cause abortions in sheep and goats

1.3.2 Need for Bird Damage Management at Airports

The risk that birds pose to aircraft is well documented with the worst case reported in Boston in 1960 when 62 people were killed in the crash of an airliner which collided with a flock of starlings (Terres 1980). Other examples include:

- In fiscal year (FY) 1996, Canada geese were struck by an Air Force AWACS plane at Elmendorf Air Force Base in Alaska, causing the death of 24 airmen when the plane crashed. Additionally, a $190 million plane was lost (Dolbeer 1997).

- In 1999, when a Boeing 757 struck a flock of starlings at the Cincinnati / Northern Kentucky International Airport and was forced to abort the flight (NTSB 1999). Damages were assessed at more than $500,000 by airport officials (D.T. Little, WS Pers. Comm. 1999).

Flocks of starlings may intersect aircraft flight lines upon entering or exiting a roost at or near airports and present a safety threat to aviation. Starlings are a particularly dangerous bird to aircraft operations because of their high body density and tendency to travel in large flocks of hundreds to thousands of birds (Seamans et al. 1995).

Generally, bird collisions occur when aircraft are near the ground. From 1990-1999, approximately 55% of reported bird strikes occurred when the aircraft was at an altitude of 100 feet above ground level or less. Additionally, 78% occurred under 900 feet above ground level and about 87% occurred under 2,000 feet

above ground level (Cleary et al. 2000). From 1990-1999, birds were involved in more than 97% of the reported wildlife strikes to civil aircraft in the USA (Cleary et al. 2000). According to the Federal Aviation Administration's National Wildlife Strike Database, of the bird species identified in wildlife strikes, pigeons, starlings, and sparrows accounted for 4%, 5%, and 7% of the strikes, respectively (Cleary et al. 2000). From 1990-2004 over 200 bird strikes were reported to the FAA in Iowa, of these only about 30% of the strikes were positively identified. This number is likely to be much greater since an estimated 80% of bird strikes to civilian aircraft go unreported (Cleary et al. 2000). Of the 30% of strikes positively identified, four were pigeons and seven were European Starlings.

The civil and military aviation communities including the FAA recognize that the treat to human health and safety from aircraft collisions with wildlife is increasing (Dolbeer 2000, MacKinnon et al. 2001). Airport operators must exercise "due diligence" in managing wildlife hazards including assessing wildlife hazards at the airport and, if needed, implementing a wildlife hazard management plan (FAA regulations in CFR 14 Part 139.337; Dolbeer 2004). The goal of airport wildlife hazard management programs is to prevent serious accidents from happening. It is for this reason that airport hazard reduction practices are conducted even though the airport may not have had a serious accident or only has a few records of bird strikes.

WS receives requests for assistance regarding bird damage management at airports in Iowa. These requests are considered serious because of the potential for loss of human life and because damage to aircraft can be extremely expensive. With the implementation of an Integrated BDM program in Iowa, WS could provide direct management and technical assistance at the request of any aviation facility in the State.

1.3.3 Need for Bird Damage Management at Cattle Feeding and Dairy Cattle Facilities

In 2002, Iowa dairy and cattle operations reported cash receipts totaling more than $2.12 Billion and $442 million, respectively (USDA-NASS 2002 (a), USDA-NASS 2002 (b)). Starlings, sparrows, and, to a lesser extent, pigeons often cause damage at cattle feeding facilities and dairies by congregating in large numbers to feed on the grain component of cattle feed. Such feeding strategies present disease threats to livestock through contamination of feed with fecal material. The birds also cause damage by defecating on fences, shade canopies, and other structures, which can accelerate corrosion of metal components and which generally is considered an unsightly nuisance and potential health hazard for the feedlot/dairy operators and their personnel (Section 1.3.1).

Scope of Livestock Feed Losses. The concentration of large numbers of cattle eating huge quantities of feed in confined pens results in a tremendous attraction to starlings and pigeons. Diet rations for cattle contain all of the nutrients and fiber that cattle need, and are so thoroughly mixed that cattle are unable to select any single component over others. The basic constituent of most rations is silage and the high energy portion is usually provided as barley, which may be incorporated as whole grain or crushed or ground cereal. While cattle cannot select individual ingredients from that ration, starlings can and do select the barley, thereby altering the energetic value of the complete diet. The removal of this high energy fraction by starlings, is believed to reduce milk yields, weight gains, and is economically critical (Feare 1984). Glahn and Otis (1986) reported that starling damage was also associated with proximity to roosts, snow, and freezing temperatures and the number of livestock on feed.

The economic significance of feed losses to starlings has been demonstrated by Besser et al. (1968) who concluded that the value of losses in feedlots near Denver, Colorado was $84 per 1,000 birds in 1967. Forbes (1995) reported starlings consume up to 50% of their body weight in feed each day. Glahn and Otis (1981) reported losses of 4.8 kg of pelletized feed consumed per 1,000 bird minutes. Glahn (1983) reported that 25.8% of Tennessee farms experienced starling depredation problems, 6.3% of them involved considerable economic loss. Williams (1983) estimated seasonal feed losses to five species of blackbirds (primarily brown-headed cowbirds) at one feedlot in south Texas at nearly 140 tons valued at $18,000.

Scope of Livestock Health Problems. A number of diseases that affect livestock have been associated with pigeons, starlings, and sparrows (Weber 1979). Transmission of diseases such as Transmissible

Gastroenteritis Virus (TGE), Tuberculosis (TB), and Coccidiosis to livestock has been linked to migratory flocks of starlings. Estimates of the dollar value of this type of damage are not available. A consulting veterinarian for a large cattle feeding facility in Texas indicated problems associated with coccidiosis declined following reduction of starling numbers using the facility (R. Smith, WS, Canyon District, TX, Pers. Comm.).

Table 1-3. Diseases of livestock that have been linked to pigeons, starlings, and/or sparrows. Information from Weber (1979).

Disease	Livestock affected	Symptoms	Comments
Bacterial:			
Erysipeloid	cattle, swine, horses, sheep, goats, chickens, turkeys, ducks	Pigs - arthritis, skin lesions, necrosis, septicemia Sheep - lameness	serious hazard for the swine industry, rejection of swine meat at slaughter due to speticemia, also affects dogs
Salmonellosis	all domestic animals	abortions in mature cattle, mortality in calves, decrease in milk production in dairy cattle Colitis in pigs,	over 1700 serotypes □
Pasteurellosis	cattle, swine, horses, rabbits, chickens, turkeys	Chickens and turkeys die suddenly without illness pneumonia, bovine mastitis, abortions in swine, septicemia, abscesses	also affects cats and dogs
Avian Tuberculosis	chickens, turkeys, swine, cattle, horses, sheep	Emaciation, decrease in egg production, and death in poultry. Mastitis in cattle	also affects dogs and cats
Streptococcosis	cattle, swine, sheep, horses, chickens, turkeys, geese, ducks, rabbits	Emaciation and death in poultry. Mastitis in cattle, abscesses and inflamation of the heart , and death in swine	feral pigeons are susceptible and aid in transmission
Yersinosis	cattle, sheep, goats, horses, turkeys, chickens, ducks	abortion in sheep and cattle	also affects dogs and cats
Vibriosis	cattle and sheep	In cattle, often a cause of infertility or early embryonic death. In sheep, the only known cause of infectious abortion in late pregnancy	of great economic importance
Listeriosis	Chickens, ducks, geese, cattle, horses, swine, sheep, goats	In cattle, sheep, and goats, difficulty swallowing, nasal discharge, paralysis of throat and facial muscles	also affects cats and dogs

Viral:			
Meningitis	cattle, sheep, swine, poultry	inflamation of the brain, newborn calves unable to suckle	associated with listeriosis, salmonellosis, cryptococcosis
Encephalitis (7 forms)	horses, turkeys, ducks	drowsiness, inflamation of the brain	mosquitoes serve as vectors
Mycotic (fungal):			
Aspergillosis	cattle, chickens, turkeys, and ducks	abortions in cattle	common in turkey poults
Blastomycosis	weight loss, fever, cough, bloody sputum and chest pains.	Rarely	affects horses, dogs and cats
Candidiasis	cattle, swine, sheep, horses, chickens, turkeys	In cattle, mastitis, diarrhea, vaginal discharge, and aborted fetuses	causes unsatisfactory growth in chickens
Cryptococcosis	cattle, swine, horses	chronic mastitis in cattle, decreased milk flow and appetite loss	also affects dogs and cats
Histoplasmosis	horses cattle and swine	(in dogs) chronic cough, loss of appetite, weakness, depression, diarrhea, extreme weight loss	also affects dogs; actively grows and in soil and remains active long after birds have departed
Coccidiosis	poultry, cattle, and sheep	bloody diarrhea in chickens, dehydration, retardation of growth	almost always present in sparrows; also found in pigeons and starlings
Protozoal:			
American Trypanosomiasis	infection of mucous membranes of eyes or nose, swelling	possible death in 2-4 weeks	caused by the conenose bug found on pigeons
Toxoplasmosis	cattle, swine, horses, sheep, chickens, turkeys	In cattle, muscular tremors, coughing, sneezing, nasal discharge, frothing at the mouth, prostration and abortion	also affects dogs and cats
Rickettsial/ Chlamydial:			
Chlamydiosis	cattle, horses, swine, sheep, goats, chickens, turkeys, ducks, geese	In cattle, abortion, arthritis, conjunctivitis, enteritis	also affects dogs and cats and many wild birds and mammals
Q Fever	affects cattle, sheep, goats, and poultry	may cause abortions in sheep and goats	can be transmitted by infected ticks

1.3.4 Need for Bird Damage Management Related to Agricultural Crops

Several studies have shown that starlings can pose a great economic threat to agricultural producers (Besser et. al. 1968, Dolbeer et al. 1978, and Feare 1984). Starlings and sparrows can also have a detrimental

impact on agricultural food production by feeding at vineyards, orchards, gardens, crops, and feedlots (Weber 1979). For example, starlings feed on numerous types of fruits such as, cherries, figs, blueberries, apples, apricots, grapes, nectarines, peaches, plums, persimmons, strawberries, and olives (Weber 1979). Starlings were also recently found to damage ripening corn (Johnson and Glahn 1994) and are known to feed on the green, milk and dough stage kernels of sorghum (Weber 1979). Additionally, starlings may pull sprouting grains, especially winter wheat, and feed on planted seed (Johnson and Glahn 1994). Sparrows damage crops by pecking seeds, seedlings, buds, flowers, vegetables, and maturing fruits (Fitzwater 1994), and localized damage can be great because sparrows often feed in large flocks on a small area (Fitzwater 1994).

1.3.5 Need for Bird Damage Management to Protect Property

Birds frequently damage structures on private property, or public facilities, with fecal contamination. Accumulated bird droppings can reduce the functional life of some building roofs by 50% (Weber 1979). Corrosion damage to metal structures and painted finishes, including those on automobiles, can occur because of uric acid from bird droppings. Electrical utility companies frequently have problems with birds causing power outages by shorting out transformers and substations. Persons and businesses concerned about these types of damage may request WS assistance.

Pigeons, starlings, and sparrows cause economic damage to aircraft in hangars. Accumulation of fecal droppings on planes, helicopters, maintenance equipment, and hangar floors results in unscheduled maintenance to clean planes and buildings to protect painted surfaces from acidic fecal droppings and maintain a sanitary work environment. Furthermore, birds may build nests in engines of idle aircraft which may cause engine damage or cause a fire.

1.4 SCOPE OF THIS ENVIRONMENTAL ANALYSIS

1.4.1 Actions Analyzed

This EA evaluates bird damage management by WS to protect: 1) property, 2) agricultural resources, 3) livestock and dairies, and 4) public health and safety in Iowa. Protection of other resources or other program activities would be addressed in other NEPA analysis, as appropriate.

1.4.2 American Indian Lands and Tribes

MOUs, agreements and NEPA documentation would be prepared as appropriate before conducting BDM on tribal lands.Currently, Iowa WS does not have any MOUs with any American Indian tribes. If WS enters into an agreement with a tribe for BDM, this EA would be reviewed and supplemented, if appropriate, to insure compliance with NEPA.

1.4.3 Period for which this EA is Valid

If it is determined that an EIS is not needed, this EA would remain valid until the WS program in Iowa and other appropriate agencies determine that new needs for action, changed conditions or new alternatives having different environmental effects must be analyzed. At that time, this analysis would be supplemented pursuant to NEPA. Review of the EA would be conducted each year to ensure that impacts of the program are consistent with those evaluated in the EA.

1.4.4 Site Specificity

This EA analyzes the potential impacts of BDM activities on all public and private lands in Iowa under MOUs, Cooperative Agreements, and equivalent documents. It also addresses the impacts of BDM in areas where additional agreements may be signed in the future. Because the proposed action is to reduce

damage and because the program's goals and directives are to provide services when requested, within the constraints of available funding and workforce, it is conceivable that additional BDM efforts could occur. Thus, this EA anticipates this potential expansion and analyzes the impacts of such efforts as part of the program.

Planning for the management of bird damage must be viewed as being conceptually similar to federal or other agency actions whose missions are to stop or prevent adverse consequences from anticipated future events for which the actual sites and locations where they will occur are unknown but could be anywhere in a defined geographic area. Examples of such agencies and programs include fire and police departments, emergency clean-up organizations, insurance companies, etc. Although some of the sites where bird damage will occur can be predicted, all specific locations or times where such damage will occur in any given year cannot be predicted. This EA emphasizes major issues as they relate to specific areas whenever possible, however, many issues apply wherever bird damage and resulting management occurs, and are treated as such. The standard WS Decision Model (Slate et al. 1992) would be the site-specific procedure for individual actions conducted by WS in New Jersey (see Chapter 3 for a description of the Decision Model and its application).

The analyses in this EA are intended to apply to any action that may occur *in any locale* and at *any time* within the State of Iowa. In this way, APHIS-WS believes it meets the intent of NEPA with regard to site-specific analysis and that this is the only practical way for WS to comply with NEPA and still be able to accomplish its mission.

1.4.5 Summary of Public Involvement

Issues related to the proposed action were initially defined and preliminary alternatives were identified by WS. As part of this process, and as required by the Council on Environmental Quality (CEQ) and APHIS-NEPA implementing regulations, this document and its subsequent Decision will be made available to the public through "Notices of Availability" (NOA) published in local media and through direct mailings of NOA to parties that have specifically requested to be notified. New issues or alternatives raised after publication of public notices will be fully considered to determine whether the EA and its Decision should be revisited and, if appropriate, revised.

1.5 RELATIONSHIP TO OTHER ENVIRONMENTAL DOCUMENTS

ADC Programmatic Environmental Impact Statement

WS, previously called Animal Damage Control (ADC), has issued a Final EIS on the national APHIS/WS program (USDA 1997). Pertinent and current information available in the EIS has been incorporated by reference into this EA.

1.6 AUTHORITY AND COMPLIANCE

1.6.1 Wildlife Services Legislative Authority

Under various acts of Congress, the Secretary of Agriculture is authorized to carry out wildlife control programs necessary to protect the Nation's agricultural and other resources. Among these are the Act of March 2, 1931, 46 Stat. 1468-69, 7 U.S.C. ' ' 426-426b, as amended and Public Law No. 100-202, ' 101(k), 101 Stat. 1329-331, 7 U.S.C. ' 426c. Under the Act of March 2, 1931 and 7 U.S.C. ' 426c, the Secretary of Agriculture may carry out these wildlife control programs alone, or may enter into cooperative agreements with States, local jurisdictions, individuals and public and private agencies whereby they may fund and assist in carrying out

such programs. The Secretary has delegated the authority under both these Acts to APHIS. Within that agency, the authority resides with the Wildlife Services (WS) program.

WS is a cooperatively funded, service-oriented program that receives requests for assistance from private and public entities, including other governmental agencies. Before any wildlife damage management is conducted, Cooperative Agreements, Agreements for Control or other comparable documents detailing when, where, and how BDM will be conducted are in place. As requested, WS cooperates with land and wildlife management agencies to reduce wildlife damage effectively and efficiently according to applicable federal, state and local laws and Memorandums of Understanding (MOUs) between WS and other agencies. WS' mission, developed through its strategic planning process, is

> 1) *"to provide leadership in wildlife damage management in the protection of America's agricultural, industrial and natural resources, and*
>
> *2) to safeguard public health and safety."*

WS' Policy Manual reflects this mission and provides guidance for engaging in wildlife damage management through:

- Training of wildlife damage management professionals;
- Development and improvement of strategies to reduce losses and threats to humans from wildlife;
- Collection, evaluation, and dissemination of management information;
- Informing and educating the public on how to reduce wildlife damage;
- Providing data and a source for limited-use management materials and equipment, including pesticides (USDA 1989).

1.6.2 Iowa Department of Agriculture and Land Stewardship (IDALS)

The Pesticide Bureau of the Iowa Department of Agriculture and Land Stewardship administers and enforces provisions of the Pesticide Act, Chapter 206 Iowa Code and the administrative rules contained in 21 Iowa Administrative Code Chapters 44 & 45, Iowa Department of Agriculture and Land Stewardship. The functional program areas addressed by the bureau are: Enforcement, Private and Commercial Pesticide Applicator Certification, Pesticide Product Registration, Licensing of Pesticide Dealers and Commercial Applicator Businesses, Groundwater Protection, Endangered Species Protection, and Worker Protection Outreach. The U.S. Environmental Protection Agency (EPA) provides matching funds to support many of the activities. The bureau also conducts a review of private pesticide applicator records under a cooperative agreement with the U.S. Department of Agriculture.

The IDA currently has a MOU with WS, which establishes a cooperative relationship between WS and the IDA, outlines responsibilities, and sets forth annual objectives and goals of each agency for resolving wildlife damage in Iowa.

1.6.3 Iowa Department of Natural Resources (IDNR)

The Iowa Department of Natural Resources' authority in wildlife management is given under Title XI, Chapters 456A.23 of the Iowa Code 2003 Supplement. This legislation gives IADNR the responsibility/authority to protect, propagate, increase, and preserved the wild mammals, fish, birds, reptiles, and amphibians of the state and enforce by proper actions and proceedings the laws, rules, and regulations relating to them.

1.6.4 Compliance with Federal and State Statutes

Several federal laws, state laws, and state regulations regulate WS wildlife damage management activities. WS complies with all applicable laws and regulations, and consults and cooperates with other agencies as appropriate.

National Environmental Policy Act. All Federal actions are subject to NEPA (Public Law 91-190, 42 U.S.C. 4321 et seq.). WS follows the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500 et seq.), USDA NEPA implementing regulations (7 CFR 1b), and the APHIS Implementing Procedures (7 CFR 372) as a part of the decision-making process. NEPA sets forth the requirement that Federal actions with the potential to significantly affect the human environment be evaluated in terms of their impacts for the purpose of avoiding or, where possible, mitigating and minimizing adverse impacts. Federal activities affecting the physical and biological environment are regulated, in part, by CEQ through regulations in Title 40, Code of Federal Regulations, Parts 1500-1508. In accordance with CEQ and USDA regulations, APHIS NEPA Procedures, as published in the Federal Register (44 CFR 50381-50384) provide guidance to APHIS regarding the NEPA process.

Pursuant to NEPA and CEQ regulations, this EA documents the analysis of a proposed Federal action's impact, informs decision-makers and the public of reasonable alternatives, and serves as a decision-aiding mechanism to ensure that the policies and goals of NEPA are infused into Federal agency planning and decision making. An EA is prepared by integrating as many of the natural and social sciences as may be warranted based on the potential effects of the proposed action. The direct, indirect, and cumulative impacts of the proposed action are analyzed.

Endangered Species Act. It is federal policy, under the ESA, that all federal agencies shall seek to conserve endangered and threatened species and shall utilize their authorities in furtherance of the purposes of the Act (Sec. 2(c)). WS conducts Section 7 consultations with the United States Fish and Wildlife Service (USFWS) to use the expertise of the USFWS to ensure that "any action authorized, funded or carried out by such an agency... is not likely to jeopardize the continued existence of any endangered or threatened species . . . each agency shall use the best scientific and commercial data available" (Sec. 7(a)(2)). WS obtained a Biological Opinion (B.O.) on the impacts of the national Wildlife Services program from the U.S. Fish and Wildlife Service describing potential effects on T&E species and prescribing reasonable and prudent measures for avoiding jeopardy (USDA 1997, Revised, Appendix F).

Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-711; 40 Stat. 755), as Amended. The MBTA provides USFWS regulatory authority to protect families of bird species that migrate outside the United States. The law prohibits the "*take*" of these species by any entity, unless permitted by USFWS; people can obtain permits to take migratory birds under this law that are causing damage to resources. A recent court case involving mute swans held that the MBTA must provide protection to individual non-native species found within the United States that belong to families of birds already protected under the Act. As a result, many other species in addition to the mute swan became eligible for protection under the MBTA that had previously been excluded. Thus, the Migratory Bird Treaty Reform Act of 2004 was passed to clarify the original intent of the MBTA, the conservation and protection of migratory birds native to North America, and directed USFWS to establish a list of non-native bird species found in the United States. Species on this list do not have MBTA protection. The USFWS has completed this list (F.R. Vol. 70, No 49 12710-12716). Certain species in North America including house sparrows and European starlings are already not protected under the MBTA because neither the species nor their family were listed in the MBTA. Rock doves are included in the list of species to be excluded from protections under MBTA. All actions conducted in this EA will be in compliance with the regulations of the MBTA, as amended.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). FIFRA requires the registration, classification, and regulation of all pesticides used in the United States. The U.S. Environmental Protection Agency (EPA) is responsible for implementing and enforcing FIFRA. All pesticides that would be used by the WS program in Iowa would be registered with and regulated by the EPA and Iowa Department of

Agriculture (IDA), and used by WS in compliance with label directions and all other applicable State and Federal regulations and policies.

Investigational New Animal Drug (INAD). The drug alpha-chloralose (AC) has been used as a sedative for animals and is registered with the Food and Drug Administration (FDA) to capture Canada geese, waterfowl, coots, ravens, pigeons and sandhill cranes. FDA approval for use under INAD (21 CFR, Part 511) authorized WS to use the drug as a non-lethal form of capture.

Executive Order 13112 of February 3, 1999. This Order prevents the introduction of invasive species and provides for their control to minimize the economic, ecological, and human health impacts that invasive species cause. Pigeons, starlings, and sparrows are recognized as invasive species that have adverse economic, ecological, and human health impacts.

Executive Order 13186 of January 10, 2001 "Responsibilities of Federal Agencies to Protect Migratory Birds." This Order states that each federal agency, taking actions that have, or are likely to have, a measurable negative effect on migratory bird populations, is directed to develop and implement, a MOU with the USFWS that shall promote the conservation of migratory bird populations. WS has developed a draft MOU with the USFWS as required by this Order and is currently waiting for USFWS approval. WS will abide by the MOU once it is finalized and signed by both parties.

Occupational Safety and Health Act of 1970. The Occupational Safety and Health Act of 1970 and its implementing regulations (29CFR1910) on sanitation standards states that, "Every enclosed workplace shall be so constructed, equipped, and maintained, so far as reasonably practical, as to prevent the entrance or harborage of rodents, insects, and other vermin. A continuing and effective extermination program shall be instituted where their presence is detected." This standard includes birds that may cause safety and health concerns at workplaces.

The Native American Graves and Repatriation Act of 1990. The Native American Graves Protection and Repatriation Act requires federal agencies to notify the Secretary of the Department that manages the federal lands upon the discovery of Native American cultural items on federal or tribal lands. Federal projects would discontinue work until a reasonable effort has been made to protect the items and the proper authority has been notified.

National Historic Preservation Act (NHPA) of 1966 as amended. The NHPA of 1966, and its implementing regulations (36 CFR 800), requires federal agencies to: 1) determine whether activities they propose constitute "undertakings" that has the potential to cause effects on historic properties and, 2) if so, to evaluate the effects of such undertakings on such historic resources and consult with the Advisory Council on Historic Preservation (i.e. State Historic Preservation Office, Tribal Historic Preservation Officers), as appropriate. WS actions on tribal lands are only conducted at the tribe's request and under signed agreement; thus, the tribes have control over any potential conflict with cultural resources on tribal properties.

Each of the BDM methods described in Appendix B that might be used operationally by WS do not cause major ground disturbance, do not cause any physical destruction or damage to property, do not cause any alterations of property, wildlife habitat, or landscapes, and do not involve the sale, lease, or transfer of ownership of any property. In general, such methods also do not have the potential to introduce visual, atmospheric, or audible elements to areas in which they are used that could result in effects on the character or use of historic properties. Therefore, the methods that would be used by WS under the proposed action are not generally the types of activities that would have the potential to affect historic properties. If an individual activity with the potential to affect historic resources is planned under an alternative selected as a result of a decision on this EA, then site-specific consultation as required by Section 106 of the NHPA would be conducted as necessary.

There is potential for audible effects on the use and enjoyment of a historic property when methods such as propane exploders, pyrotechnics, firearms, or other noise-making methods are used at or in close proximity to such sites for purposes of hazing or removing nuisance birds or other wildlife. However, such methods would only be used at a historic site at the request of the owner or manager of the site to resolve a damage or nuisance problem, which means such use would be to benefit the historic property. A built-in mitigating factor for this issue is that virtually all of the methods involved would only have temporary effects on the audible nature of a site and can be ended at any time to restore the audible qualities of such sites to their original condition with no further adverse effects. Site-specific consultation as required by Section 106 of the NHPA would be conducted as necessary in those types of situations.

Environmental Justice and Executive Order 12898 - "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations." Executive Order 12898, promotes the fair treatment of people of all races, income levels and cultures with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Environmental justice is the pursuit of equal justice and protection under the law for all environmental statutes and regulations without discrimination based on race, ethnicity, or socioeconomic status. Environmental Justice is a priority within APHIS and WS. Executive Order 12898 requires federal agencies to make environmental justice part of their mission, and to identify and address disproportionately high and adverse human health and environmental effects of federal programs, policies and activities on minority and low-income persons or populations. APHIS implements Executive Order 12898 principally through its compliance with NEPA. All WS activities are evaluated for their impact on the human environment and compliance with Executive Order 12898.

Wildlife Services personnel use only legal, effective, and environmentally safe wildlife damage management methods, tools, and approaches. All chemicals used by WS are regulated by the EPA through FIFRA, the Iowa Department of Agriculture, by MOUs with land managing agencies, and by WS Directives. Based on a thorough Risk Assessment, APHIS concluded that when WS program chemicals are used according to label directions, they have negligible impacts on the environment and do not pose a risk to human health and safety (USDA 1997, Appendix P). The WS operational program properly disposes of any excess solid or hazardous waste. It is not anticipated that the proposed action would result in any adverse or disproportionate environmental impacts to minority and low-income persons or populations. In contrast, the proposed action may benefit minority or low-income populations by reducing bird damage such as threats to public health and safety.

Protection of Children from Environmental Health and Safety Risks (Executive Order 13045). Children may suffer disproportionately from environmental health and safety risks for many reasons, including their development physical and mental status. Because WS makes it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, WS has considered the impacts that this proposal might have on children. The proposed bird damage management program would only occur by using legally available and approved methods where it is highly unlikely that children would be adversely affected. For these reasons, WS concludes that it would not create an environmental health or safety risk to children from implementing this proposed action.

Crow and Pigeon Regulations—IAC 571.100.2(1-3) (Iowa Administrative Code 5/26/93.9/10/97, Natural Resource Commision, Chapter 100). There is a statewide, continuous, open season for pigeons except by firearms from April 1 to September 30. However, pigeons may be taken with firearms within a 100 yards of buildings and bridges year around. Pigeons causing a health or safety hazard may be taken by trapping, or any current EPA and Iowa registered pesticide repellants, or toxic perches. Strychnine-based products cannot be used and proper removal and disposal of all pigeons taken is required. WS does not use strychnine-based products for this work; uses prescribed removal and disposal procedures, and regularly receives firearms safety training.

Certain species of nongame shall not be protected—IAC 571—76.1(1). *Birds.* The European starling and the house sparrow shall not be protected.

1.7 PREVIEW OF THE REMAINDER OF THIS EA

The remainder of this EA is composed of four (4) chapters and four (4) appendices. Chapter 2 discusses and analyzes the issues and affected environment. Chapter 3 contains a description of each alternative, alternatives not considered in detail, and standard operating procedures (SOP). Chapter 4 analyzes environmental consequences and the environmental impacts associated with each alternative considered in detail. Chapter 5 contains the list of preparers of this EA. Appendix A comprises a list of the literature cited during the preparation of the EA and Appendix B is a detailed description of the methods available for use in BDM in Iowa. Appendix C and Appendix D are a comprehensive lists of Federally and State listed T&E species, respectively, in the State of Iowa.

CHAPTER 2: ISSUES AND AFFECTED ENVIRONMENT

2.0 INTRODUCTION

Chapter 2 contains a discussion of the issues relevant to the analysis, including issues that received detailed environmental impact analysis in Chapter 4 (Environmental Consequences), issues not considered in detail, with the rationale, and Standard Operating Procedures (SOPs) designed to address issues and minimize the impacts of WS' actions. Pertinent discussions of the affected environment are included in this chapter and the discussion of the environmental impacts in Chapter 4.

2.1 AFFECTED ENVIRONMENT

The areas of the proposed action could include areas in and around buildings and parks, bridges, industrial sites, urban/suburban woodlots, or at any other sites where birds may roost, loaf, or nest. Damage management activities could be conducted at agricultural fields, vineyards, orchards, farmyards, dairies, ranches, livestock operations, grain mills, and grain handling areas (e.g., railroad yards) where birds destroy crops, feed on spilled grains, or contaminate food products for human or livestock consumption. Additionally, the area of the proposed action could include airports and surrounding property where birds represent a threat to aviation safety. Bird damage management could be conducted on public or private lands with the permission of the landowner/land manager (agency).

2.2 ISSUES ANALYZED IN DETAIL

The following issues have been identified as areas of concern requiring consideration in this EA. These will be analyzed in detail in Chapter 4:

- Effects on target bird species
- Effects on other wildlife species, including T&E species
- Effects on human health and safety
- Impacts to stakeholders, including aesthetics
- Humaneness and animal welfare concerns

2.2.1 Effects on Target Bird Species

A common concern among members of the public is whether wildlife damage management actions adversely affect the viability of target species populations. The target species selected for analysis in this EA are rock doves (pigeons), European starlings, and house sparrows.

Impacts of West Nile virus on bird populations. West Nile (WN) virus has emerged in recent years in temperate regions of North America, with the first appearance of the virus in North America occurring in New York City in 1999 (MMWR 2002, Rappole et al. 2000). Since 1999 the virus has spread across the United States and was reported to occur in 44 states and the District of Columbia in 2002 (MMWR 2002). West Nile virus is typically transmitted between birds and mosquitoes. Mammals can become infected if bitten by an infected mosquito, but individuals in most species of mammals do not become ill from the virus. The most serious manifestation of the WN virus is fatal encephalitis in humans, horses, and birds. West Nile virus has been detected in dead birds of at least 138 species, including starlings, house sparrows and pigeons (CDC 2003). Although birds infected with WN virus can die or become ill, most infected birds do survive and may subsequently develop immunity to the virus (CDC 2003, Cornell University 2003). In some bird species, particularly Corvids (crows, blue jays, ravens, magpies), the virus causes

disease (often fatal) in a large percentage of infected birds (Audubon 2003, CDC 2003, Cornell University 2003, MMWR 2002). According to US Geological Survey (USGS), National Wildlife Health Center (2003), information is not currently available to know whether or not WN virus is having an impact on bird populations in North America. USGS states that it is not unusual for a new disease to cause high rates of infection or death because birds do not have the natural immunity to the infection. Furthermore, it is not known how long it will take for specific bird population to develop sufficient immunity to the virus. Surveys of wild birds completed in the last three years have shown that some birds have already acquired antibodies to the virus (USGS-WHC 2003). Based upon available Christmas Bird Counts and Breeding Bird Surveys, USGS-WHC (2003) states that there have been declines in observations of many local bird populations, however they do not know if the decline can be attributed to WN virus or to some other cause. A review of available crow population data by Audubon (2003) reveals that at least some local crow populations are suffering high WN virus related mortality, but crow numbers do not appear to be declining drastically across broad geographic areas. USGS does not anticipate that the commonly seen species, such as crows and blue jays, will be adversely affected by the virus to the point that these bird species will disappear from the U.S. (USGS-WHC 2003).

2.2.2 Effects on Other Wildlife Species, including T&E Species

A common concern among members of the public and wildlife professionals, including WS personnel, is whether the proposed action or any of the alternatives might result in adverse impacts to populations of other wildlife, particularly T&E species. WS' SOPs are designed to reduce the effects on non-target species' populations and are presented in Chapter 3. To reduce the risks of adverse affects to non-target species, WS would select damage management methods that are target-selective or apply such methods in ways to reduce the likelihood of capturing or killing non-target species.

Threatened and Endangered species lists for the USFWS and State of Iowa were reviewed to identify potential effects on federal and state listed T&E species. Special efforts are made to avoid jeopardizing T&E species through biological evaluations of the potential effects and the establishment of special restrictions or mitigation measures. WS has consulted with the USFWS under Section 7 of the ESA concerning potential effects of BDM methods on T&E species and has obtained a Biological Opinion (B.O.) on the national Wildlife Services program. For the full context of the B.O., see Appendix F of the ADC FEIS (USDA 1997, Revised). WS is also in the process of reinitiating Section 7 consultation at the program level to assure that potential effects on T&E species have been adequately addressed. WS has consulted with IDNR on the potential risks to State listed T&E species.

Some members of the public are concerned that the use of registered toxicants to reduce bird damage would have adverse impacts on other wildlife species, including T&E species. Under the alternatives proposed in this EA, the primary toxicant proposed for use by WS is DRC-1339 (WS may also recommend the use of Starlicide, a similar product), which would be used to remove pigeons or starlings from damage situations. Another chemical method that could be used is Avitrol. Avitrol is a toxicant which, as used by WS, functions primarily as an avian distressing agent and is normally used to frighten target bird species from specific problem areas (See Appendix B). Other chemicals available for use include the tranquilizer Alpha-chloralose (for live-capturing pigeons), and methyl and di-methyl anthranilate (artificial grape flavoring, which also has bird repellent capabilities). The repellent anthraquinone (Flight Control®) is not currently registered for use with the target spp. for this EA. See Appendix B and Chapter 4 for detailed descriptions of these chemicals and their potential effects.

2.2.3 Effects on Public Health and Safety

Safety of chemical control methods.

Some individuals may have concerns that chemicals used for animal control should not be used because of potential adverse effects on people directly exposed to the chemicals or to the animals that have died as a result of the chemical use. All pesticides used by WS (DRC-1339 and Avitrol)

are regulated by the EPA, Iowa Pesticide Control laws and WS directives. Use of the avian tranquilizer Alpha-Chloralose is regulated by the Food and Drug Administration and could be used for live-capturing pigeons. WS personnel who apply pesticides are certified restricted use pesticide applicators and apply pesticides and animal immobilization and euthanasia drugs according to label instructions. Certification is obtained after passing written tests administered by the Iowa Department of Agriculture. Risks assessment in USDA 1997, Revised, Appendix P, determined that when these products are used by trained personnel in accordance with all applicable regulations and policies, they do not pose a risk to human health and safety. See Appendix B for a detailed description of these chemicals and their potential effects.

WS may also use the nontoxic bird repellents methyl anthranilate (Rejex-it®). Methyl anthranalate is an artificial grape flavoring used food and soft drinks for human consumption. It is registered for use by the EPA and the State of IA, and, when used properly, poses negligible risks to human health and safety.

Impacts on human safety of non-chemical BDM methods

Some people may be concerned that WS' use of firearms, traps, and pyrotechnic scaring devices could cause injuries to people. WS personnel occasionally use traps, rifles, and shotguns to remove birds that are causing damage. There is some potential fire hazard to agricultural sites and private property from pyrotechnic use.

Firearm use is a very sensitive issue because of public concerns regarding gun safety and the threat of misuse of firearms. To ensure safe use and awareness of firearms issues, WS employees who use firearms to conduct official duties are required to attend an approved firearms safety and use training program within 3 months of their appointment and a refresher course every 2 years afterwards (WS Directive 2.615). WS employees who carry firearms as a condition of employment, are required to sign a form certifying that they meet the criteria as stated in the *Lautenberg Amendment* which prohibits firearm possession by anyone who has been convicted of a misdemeanor crime of domestic violence.

Impacts on human health and safety from birds

The concern stated here is that the absence of adequate BDM would result in adverse effects on human health and safety, because bird damage would not be curtailed or reduced to the minimum levels possible and practical. The potential impacts of not conducting such work could lead to increased incidence of injuries, illness, or loss of human lives.

2.2.4 Impacts to Stakeholders, including Aesthetics

The human attraction to animals has been well documented throughout history and started when humans began domesticating animals. The American public is no exception and today a large percentage of households have pets. Some people may consider individual wild animals and birds as "pets" or exhibit affection toward these animals. Other individuals my have the opposite response and wish to avoid contact with animals. The public reaction to and opinions on BDM techniques are as variable and mixed as the numerous philosophical, aesthetic, and personal attitudes, values, and opinions toward wildlife.

There may be some concern that the proposed action or alternatives would result in the loss of aesthetic benefits to the public, resource owners, or neighboring residents. Wildlife generally is regarded as providing economic, recreational, and aesthetic benefits (Decker and Goff 1987), and the mere knowledge that wildlife exists is a positive benefit to many people. Aesthetics is a philosophy dealing with the nature of beauty, or the appreciation of beauty. Therefore, aesthetics is truly subjective in nature and is dependent on what an observer regards as beautiful.

Wildlife populations provide a range of social and economic benefits (Decker and Goff 1987). These include direct benefits related to consumptive and non-consumptive use (e.g., wildlife-related recreation, observation, harvest, sale), indirect benefits derived from vicarious wildlife related experiences (e.g., reading, television viewing), and the personal enjoyment of knowing wildlife exists and contributes to the stability of natural ecosystems (e.g., ecological, existence, bequest values) (Bishop 1987). Direct benefits are derived from a user's personal relationship to animals and may take the form of direct consumptive use (using up the animal or intending to) or non-consumptive use (viewing the animal in nature or in a zoo, photography) (Decker and Goff 1987). Indirect benefits or indirect exercised values arise without the user being in direct contact with the animal and come from experiences such as looking at photographs and films of wildlife, reading about wildlife, or benefiting from activities or contributions of animals such as their use in research (Decker and Goff 1987). Indirect benefits come in two forms: bequest and pure existence (Decker and Goff 1987). Bequest is providing for future generations and pure existence is merely knowledge that the animals exist (Decker and Goff 1987).

Many people directly affected by problems and threats to public health or safety caused by birds, insist upon their removal from the property or public location when they cause damage. Some members of the public have an idealistic view and believe that all wildlife should be captured and relocated to another area to alleviate damage or threats to public health or safety. Others directly affected by the problems caused by wildlife may advocate tolerance of the problem. Individuals not directly affected by the harm or damage caused by wildlife may be supportive, neutral, or totally opposed to any removal of wildlife from specific locations or sites. Those totally opposed to bird damage management want WS to teach tolerance for damage and threats to public health or safety, and that wildlife should never be killed. Some people would strongly oppose removal of birds no matter what the amount of or nature of the damage.

The WS program in Iowa only conducts wildlife damage management at the request of the affected property owner or resource manager. If WS received requests from an individual or official for BDM, WS would address the issues/concerns and consideration would be made to explain the reasons why the individual damage management actions would be necessary and the consequences of the available management alternatives. Management actions would be carried out in a caring, humane, and professional manner.

2.2.5 Humaneness and Animal Welfare Concerns of Methods Used

The issue of humaneness and animal welfare, as it relates to the killing or capturing of wildlife is an important but very complex concept that can be interpreted in a variety of ways. Schmidt (1989) indicated that vertebrate pest damage management for societal benefits could be compatible with animal welfare concerns, if *". . . the reduction of pain, suffering, and unnecessary death is incorporated in the decision making process."*

Suffering is described as a *". . . highly unpleasant emotional response usually associated with pain and distress."* However, suffering *". . . can occur without pain . . . ,"* and *". . . pain can occur without suffering . . . "* (AVMA 1987). Because suffering carries with it the implication of a time frame, a case could be made for *". . . little or no suffering where death comes immediately . . . "* (CDFG 1991), such as shooting.

Defining pain as a component in humaneness of WS methods appears to be a greater challenge than that of suffering. Pain obviously occurs in animals. Altered physiology and behavior can be indicators of pain, and identifying the causes that elicit pain responses in humans would *". . . probably be causes for pain in other animals . . . "* (AVMA 1987). However, pain experienced by individual animals probably ranges from little or no pain to considerable pain (CDFG 1991).

Pain and suffering, as it relates to WS damage management methods, has both a professional and lay point of arbitration. Wildlife managers and the public would be better served to recognize the complexity of

defining suffering, since *". . . neither medical nor veterinary curricula explicitly address suffering or its relief"* (CDFG 1991).

Therefore, humaneness, in part, appears to be a person's perception of harm or pain inflicted on an animal, and people may perceive the humaneness of an action differently. The challenge in coping with this issue is how to achieve the least amount of animal pain and suffering within the constraints imposed by current technology and funding.

WS works to improve the selectivity and humaneness of management techniques through research and development. Research is continuing to bring new findings and products into practical use. Until new findings and products are found practical, a certain amount of animal suffering could occur when some BDM methods are used in situations where non-lethal damage management methods are not practical or effective.

Iowa WS personnel are experienced and professional in their use of management methods so that they are as humane as possible under the constraints of current technology, workforce and funding. Mitigation measures/SOPs used to maximize humaneness are listed in Chapter 4.

2.3 ISSUES NOT CONSIDERED IN DETAIL WITH RATIONALE

2.3.1 No Wildlife Damage Management at Taxpayer Expense; Wildlife Damage Management should be Fee Based

Most funding for WS activities in Iowa, except for relatively minor supervisory and administrative costs, comes from the cooperators requesting assistance including Iowa state agencies, counties, cities, private individuals and businesses, and other federal agencies via Cooperative Agreements. Federal, state, and local officials have decided that wildlife damage management should be conducted by appropriating funds. WS was established by Congress as the agency authorized to provide wildlife damage management assistance to the people of the United States. Wildlife damage management is an appropriate sphere of activity for government programs, since aspects of wildlife damage management are a government responsibility and authorized and directed by law.

2.3.2 Bird Damage should be Managed by Private Nuisance Wildlife Control Agents

Private nuisance wildlife control agents could be contacted to reduce bird damage for property owners or property owners could attempt to reduce their own damage problems. Some property owners would prefer to use a private nuisance wildlife control agent because the nuisance wildlife agent is located in closer proximity to the problem and thus could provide the service at less expense, or because they prefer to use a private business rather than a government agency. However, some property owners would prefer to contract with a government agency. In particular, large industrial businesses and cities and towns may prefer to use WS because of security and safety issues and reduced administrative burden. Additionally, use of the pesticide DRC-1339 may be the most effective damage management method in some situations, either used alone or as part of an IWDM program. This avicide is registered only for use by WS and is not available to private nuisance wildlife control agents or property owners. However, the restricted use pesticide, Starlicide, is similar to DRC-1339 and may be used by certified applicators.

2.3.3 Appropriateness of Preparing an EA (Instead of an EIS) for Such a Large Area

Some individuals might question whether preparing an EA for an area as large as the State of Iowa would meet the NEPA requirements for site specificity. If in fact a determination is made through this EA that the proposed action would have a significant environmental impact, then an EIS would be prepared. In terms of considering cumulative impacts, one EA analyzing impacts for the entire State may provide a better analysis than multiple EAs covering smaller zones. In addition, the WS program in Iowa only conducts

BDM in small areas of the State like two properties near Eddyville, IA involving five and twenty acres respectively where damage is occurring or likely to occur.

2.3.4 Effectiveness of Bird Damage Management Methods

A concern among members of the public is whether the methods of reducing bird damage will be effective in reducing or alleviating bird damage and conflicts. The effectiveness of each method or methods can be defined in terms of decreased potential for health risks, decreased human safety hazards, reduced property damage, and reduced agricultural damage. In terms of the effectiveness of a specific method or group of methods, this would not only be based on the specific method used, but more importantly upon the skills and abilities of the person implementing the control methods and the ability of that person to determine the appropriate course of action to take for each specific damage situation. WS specialists use the Decision Model described in Section 3.2.3 to develop situation-specific management plans. It would be expected that the more experience a person has in addressing bird damage conflicts and implementing control methods the more likely they would be successful reducing damage to acceptable levels. WS technical assistance program provides information to assist persons in implementing their own BDM program, but at times the person receiving WS technical assistance may not have the skill or ability to implement the BDM methods recommended by WS. Therefore, it is more likely that a specific BDM method or group of methods would be effective in reducing damage to acceptable levels when WS professional bird damage assistance is provided than that would occur when the inexperienced person attempts to conduct BDM activities.

CHAPTER 3: ALTERNATIVES

3.0 INTRODUCTION

This chapter describes the range of alternatives and strategies for addressing starling, pigeon, and sparrow damage in Iowa. The alternatives analyzed in detail are:

- Alternative 1: Only Technical Assistance;
- Alternative 2: Integrated Bird Damage Management Program. (Proposed Action/No Action);
- Alternative 3: Only Non-lethal Bird Damage Management;
- Alternative 4: No Bird Damage Management by WS.

3.1 DESCRIPTION OF THE ALTERNATIVES

3.1.1 Alternative 1: Only Technical Assistance

Under this alternative, WS would not provide any operational assistance with bird damage in Iowa. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, or others could conduct BDM using any legal lethal or non-lethal method available to them. Currently, DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by others would be illegal. However, the restricted use pesticide, Starlicide, is similar to DRC-1339 and may be used by certified applicators. Avitrol could also be used by state certified restricted-use pesticide applicators.

3.1.2 Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Wildlife Services proposes to continue the current bird damage management program that responds to pigeon, starling, and sparrow damage requests in the State of Iowa. An IWDM approach would be implemented to reduce damage activities to property, agricultural resources, livestock, and public health and safety. Damage management would be conducted on public and private property in Iowa when the resource owner (property owner) or manager requests assistance. The IWDM strategy would involve the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, WS could provide technical assistance and direct operational damage management, including non-lethal and lethal management methods by applying the WS Decision Model (Slate et al. 1992). When appropriate, physical exclusion, habitat modification or harassment would be recommended and utilized to reduce damage. In other situations, birds would be removed as humanely as possible using: shooting, trapping, and registered pesticides. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response is often likely to be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy.

3.1.3 Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS would only provide technical and operational assistance with nonlethal methods of bird damage management. Requests for information regarding lethal management approaches would be referred to IDNR, FWS, local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, contract for WS direct control services, use contractual services of private businesses, or take no action. Persons receiving WS' non-lethal technical and direct control assistance

could still resort to lethal methods that were available to them, but would have to apply the method without assistance from WS. Currently, DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by others would be illegal. However, the restricted use pesticide, Starlicide, is similar to DRC-1339 and may be used by certified applicators. Avitrol could also be used by state certified restricted-use pesticide applicators.

3.1.4 Alternative 4: No Bird Damage Management by WS

This alternative would eliminate Federal involvement in BDM in Iowa. WS would not provide direct operational or technical assistance and requesters of WS' assistance would have to conduct their own BDM without WS input. Information on BDM methods would still be available to producers and property owners through other sources such as USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information would be referred to IDNR, local animal control agencies, or private businesses or organizations. Individuals might choose to conduct BDM themselves, use contractual services of private businesses, or take no action. DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal. However, the restricted use pesticide, Starlicide, is similar to DRC-1339 and may be used by certified applicators. Avitrol could also be used by state certified restricted-use pesticide applicators.

3.2 BDM STRATEGIES AND METHODOLOGIES AVAILABLE TO WS IN IOWA

The strategies and methodologies described below include those that could be used or recommended under Alternatives 1, 2 and 3 described above. Alternative 4 would terminate both WS technical assistance and operational BDM by WS. Appendix B is a more thorough description of the methods that could be used or recommended by WS.

3.2.1 Integrated Wildlife Damage Management (IWDM)

The most effective approach to resolving wildlife damage is to integrate the use of several methods simultaneously or sequentially. The philosophy behind IWDM is to implement the best combination of effective management methods in the most cost-effective[2] manner while minimizing the potentially harmful effects on humans, target and non-target species, and the environment. IWDM may incorporate cultural practices (e.g., animal husbandry), habitat modification (e.g., exclusion), animal behavior modification (e.g., scaring), removal of individual offending animals, local population reduction, or any combination of these, depending on the circumstances of the specific damage problem.

3.2.2 The IWDM Strategies Employed by WS

Technical Assistance Recommendations

"Technical assistance" as used herein is information, demonstrations, and advice on available and appropriate wildlife damage management methods. The implementation of damage management actions is the responsibility of the requester. In some cases, WS provides supplies or materials that are of limited availability for use by non-WS entities. Technical assistance may be provided through a personal or telephone consultation, or during an on-site visit with the requester. The WS Decision Model (Slate et al. 1992) is used by the specialists when considering methods to recommend. Generally, several management strategies are described to the requester for short and long-term solutions to damage problems; these strategies are based on the level of risk, need, and the practicality of their application.

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[2] The cost of management may sometimes be secondary because of overriding environmental, legal, human health and safety, animal welfare, or other concerns (USDA 1997, Revised).

Under APHIS NEPA implementing regulations and specific guidance for the WS program, WS technical assistance is categorically excluded from the need to prepare an EA or EIS. However, it is discussed in this EA because it is an important component of the IWDM approach to resolving bird damage problems.

Direct Damage Management Assistance (Operational assistance)
Direct damage management assistance includes damage management activities that are directly conducted or supervised by WS personnel. Direct damage management assistance may be initiated when the problem cannot effectively be resolved through technical assistance alone and when *Agreements for Control* or other comparable instruments are provided for direct damage management by WS. The initial investigation defines the nature, history, and extent of the problem; species responsible for the damage; and methods available to resolve the problem. The professional skills of WS personnel are often required to effectively resolve problems, especially if restricted use pesticides are necessary or if the problems are complex.

Educational Efforts
Education is an important element of WS program activities because wildlife damage management is about finding balance and coexistence between the needs of people and needs of wildlife. This is extremely challenging as nature has no balance, but rather, is in continual flux. In addition to the routine dissemination of recommendations and information to individuals or organizations sustaining damage, lectures and demonstrations are provided to producers, homeowners, state and county agents, and other interested groups. WS frequently cooperates with other agencies in education and public information efforts. Additionally, technical papers are presented at professional meetings and conferences so that WS personnel, other wildlife professionals, and the public are periodically updated on recent developments in damage management technology, laws and regulations, and agency policies.

Research and Development
The USDA, APHIS, WS, National Wildlife Research Center (NWRC) functions as the research arm of WS by providing scientific information and development of methods for wildlife damage management that are effective and environmentally responsible. NWRC scientists work closely with wildlife managers, researchers, field specialists and others to develop and evaluate wildlife damage management techniques. NWRC research was instrumental in the development of the bird repellent, methyl anthranilate. In addition, NWRC is currently testing new repellents and experimental drugs that inhibit bird reproduction. NWRC scientists have authored hundreds of scientific publications and reports, and are respected world-wide for their expertise in wildlife damage management.

Examples of WS Direct Operational and Technical Assistance in BDM in Iowa

- Iowa WS entered into a Cooperative Agreement with a property owner for the purpose of controlling pigeons and starlings at their multi-level bridge located on the Mississippi River. Droppings deposited by excessive numbers of birds roosting, loafing and nesting at the sites generated complaints from workers and concern from management over possible disease transmission and structural damage to steel structures. WS implemented an IWDM approach using harassment and pellet rifles to reduce the associated damage at the structure.

- Iowa WS entered into a Cooperative Service Agreement with a property owner to manage pigeon, starling and sparrow roosting, loafing and nesting around cooling towers, crushers, distillers and other structures at their processing plants. Primary concerns included possible disease transmission to workers, hazardous walking surfaces, product contamination and damage to metal structures at the plant. WS continues operational management activities utilizing harassment, trapping and mist netting, and pellet rifles to safely reduce bird activity at the plant.

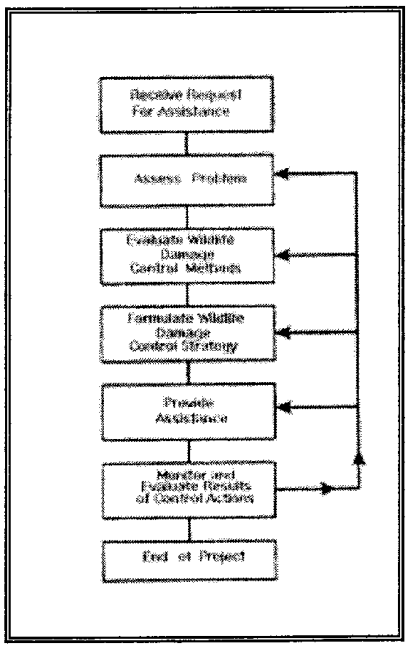
- Iowa WS assists with management of feral pigeons, starlings and sparrows endangering aircraft safety, worker and public health and causing structural damage to jetways, terminals and

surrounding city buildings. WS uses an IWDM approach consisting of harassment, trapping, toxicants, pellet rifles and exclusion to alleviate the problems.

3.2.3 WS Decision Making

WS personnel use an thought process for evaluating and responding to damage complaints which is depicted by the WS Decision Model and described by Slate et al. in 1992 (Figure 3-1). WS personnel are frequently contacted after requesters have tried or considered non-lethal methods and found them to be impractical, too costly, or inadequate for effectively reducing damage. WS personnel assess the problem then evaluate the appropriateness and availability (legal and administrative) of strategies and methods based on biological, economic and social considerations. Following this evaluation, methods deemed to be practical for the situation are incorporated into a management strategy. After this strategy has been implemented, monitoring is conducted and evaluation continues to assess the effectiveness of the strategy. If the strategy is effective, the need for further management is ended. In terms of the WS Decision Model (Slate et al. 1992), most damage management efforts consist of continuous feedback between receiving the request and monitoring the results of the damage management strategy. The Decision Model is not a documenting process, but a mental problem-solving process common to most, if not all, professions.

Figure 3-1
WS Decision Model



3.2.4 Bird Damage Management Methods Available for Use (See Appendix B)

3.2.4.1 Non-chemical, Non-lethal Methods

Some non-lethal techniques are designed to reduce the availability of the resource to target species and or to prevent the birds from having access to the site. These procedures can include exclusion methods (like netting), shifts in cultural methods and property management practices, and habitat modification. These practices are usually employed by the cooperator.

Animal behavior modification refers to tactics that alter the behavior of birds to reduce damages. Some techniques are implemented by the cooperator. Some visual repellents and frightening

devices are also implemented or maintained by the cooperator after receiving technical assistance from WS. Some but not all behavior modification tactics include the following:

- Propane exploders (to scare birds)
- Pyrotechnics (to scare birds)
- Distress calls and sound producing devices (to scare birds)
- Visual repellents and other scaring tactics
- Lasers (to scare birds)

Nest destruction of the target species before eggs or young are in the nest.

Lure crops/alternate foods are crops planted or other food resources provided to mitigate the potential loss of higher value crops.

3.2.4.2 Chemical, Non-lethal Methods (See Appendix B for detailed descriptions)

Tactile repellents reportedly deter birds from roosting, perching, or nesting on certain structural surfaces by creating a tacky or sticky surface that the birds avoid.

Methyl Anthranilate (MA) and **Di-methyl Anthranilate** (artificial grape flavoring food additive) has been shown to be an effective repellent for many bird species. It can be applied to turf or surface water or as a fog to repel birds from small areas. It may also become available for use as a livestock feed additive that has bird repellent value.

Other repellents: Other available bird repellents include anthraquinone (Avery et al. 1997) and particulate feed additives, such as charcoal particles (e.g., adhered to livestock feed; See also Appendix B).

3.2.4.3 Mechanical, Lethal Methods

Egg addling/oiling/destruction is the practice of destroying the embryo in the egg prior to hatching; physically breaking eggs; or directly removing eggs from a nest and destroying them.

Live traps are various types of traps designed to capture birds alive. However, under this EA, all starlings, pigeons and sparrows caught in live-capture devices will be euthanized. Some examples are clover traps, decoy traps, nest box traps, mist nets, cannon nets, etc. Captured target birds can then be euthanized. One of the primary advantages of these types of traps is that nontarget animals can usually be released.

Snap traps are considered quick-kill traps. They are modified rat traps that are used to remove individual birds causing damage to buildings.
Shooting is more effective as a dispersal technique than as a way to reduce bird numbers. The number that can be killed by shooting is generally very small in relation to the number involved in damage situations. Usually only a few dozen birds can be shot from individual flocks that can number anywhere from a few hundred to many thousands of birds before the rest of the birds become gun shy. Shooting, however, can be helpful in some situations to supplement and reinforce other dispersal techniques when birds have habituated to (learned there isn't a real threat associated with a frightening device) to frightening devices. It is selective for target species and may be used in conjunction with the use of spotlights, decoys and calling. Shooting with rifles, shotguns, or pellet guns (rifles or pistols) is sometimes used to manage bird damage problems when lethal methods are determined to be appropriate. The birds are killed as quickly and humanely as possible.

Sport hunting can be part of a BDM strategy to enhance the effectiveness of harassment techniques. While it is unlikely to find individuals interested in sport hunting starlings and sparrows, in IA pigeons may be taken year around within 100 yards of buildings and bridges by sport hunters in rural areas where they can operate safely.

Cervical dislocation is approved by the American Veterinary Medical Association (AVMA) and may be used to euthanize birds which are captured in live traps.

3.2.4.4 Chemical, Lethal Methods

Avitrol is a toxicant which, as used by WS, functions as a chemical frightening agent. It is registered for use on pigeons, starlings, and sparrows in various situations. This chemical works by causing distress behavior in the birds that consume treated baits from a mixture of treated and untreated (1:9) bait. Birds that consume treated bait usually die, but the vast majority of birds are frightened from the site by the distress calls of the affected birds (Johnson and Glahn 1994).

Alpha-chloralose is used as an immobilizing agent, which is a central nervous system depressant, and used to capture pigeons or other birds. It is generally used in recreational and residential areas, such as near swimming pools, shoreline residential areas, golf courses, or resorts. Alpha-chloralose is typically delivered as a well-contained bait in small quantities with minimal hazards to pets and humans; or as single baits consisting of bread or corn that are fed directly to the target birds. All target birds captured using this method would be euthanized.

DRC-1339 is a slow-acting avicide for reducing damage from several species of birds, including starlings and pigeons. DRC-1339 is highly toxic to sensitive species, but only slightly toxic to non-sensitive birds, predatory birds and mammals. This chemical would be the primary lethal chemical method used for pigeon and starling damage management under the proposed program.

Starlicide (3-chloro-p-toluidine hydrochloride) is a restricted use pesticide that is formulated as a 0.1% ready-to-use product and is commercially available to certified applicators or persons under their supervision. This avicide may be recommended or used by WS to control starlings and pigeons. Starlicide may be used in feedlots, around buildings and fenced non-crop areas, bird staging and roosting areas, federal and state wildlife refuges, and other sites (EPA 1995). Starlicide is similar to DRC-1339 used in feedlots; however, it contains less active ingredient than DRC-1339 (USDA 1997, Appendix P). Therefore, the properties of this product are similar to DRC-1339.

Carbon dioxide (CO_2) gas is an AVMA-approved euthanasia method which is sometimes used to euthanize birds that have been chemically immobilized or captured in live traps. Live birds are placed in a container or chamber into which CO_2 gas is released. The birds quickly expire after inhaling the gas.

3.3 ALTERNATIVES CONSIDERED BUT NOT ANALYZED IN DETAIL WITH RATIONALE

Several alternatives were considered, but not analyzed in detail. These were:

3.3.1 Lethal Bird Damage Management Only By WS

Under this alternative, WS would not conduct any non-lethal control of birds for BDM purposes in the State, but would only conduct lethal BDM. This alternative was eliminated from further analysis because some bird damage problems can be resolved effectively through non-lethal means. Some non-lethal strategies may provide longer-term protection than lethal techniques. Additionally, lethal methods may not always be available for use due to safety concerns or local ordinances prohibiting the use of some lethal methods, such as the discharge of firearms. For example, a number of damage problems involving the

encroachment of injurious birds into buildings can be resolved by installing barriers or repairing of structural damage to the buildings, thus excluding the birds. Further, damage situations such as large flocks of injurious birds on/near airport runways could not be removed immediately by lethal means, while scaring them away through various harassment devices might resolve the threat to passenger safety at once.

3.3.2 Compensation for Bird Damage Losses

The compensation alternative would require the establishment of a system to reimburse persons impacted by bird damage. This alternative was eliminated from further analysis because no federal or state laws currently exist to authorize such action. Under such an alternative, WS would not provide any direct control or technical assistance. Aside from lack of legal authority, analysis of this alternative in the ADC Final EIS indicated that the concept has many drawbacks (USDA 1997):

- It would require larger expenditures of money and labor to investigate and validate all damage claims to determine and administer appropriate compensation.

- Compensation would most likely be less than full market value. Responding in a timely fashion to all requests to assess and confirm damage would be difficult and certain types of damage could not be conclusively verified. For example, proving conclusively in individual situations that birds were responsible for disease outbreaks would be impossible, even though they may actually have been responsible. Thus, a compensation program that requires verification would not meet its objective for mitigating such losses.

- Compensation would give little incentive to resource owners to limit damage through improved cultural, husbandry, or other practices and management strategies.

- Not all resource owners would rely completely on a compensation program and unregulated lethal control would most likely continue as permitted by Iowa DNR regulations pertaining to starlings, pigeons and sparrows (See Section 1.6.5).

- Compensation would not be practical for reducing threats to human health and safety.

3.3.3 Use of Bird-proof Feeders in Lieu of Lethal Control at Dairies and Cattle Feeding Facilities

Bird-proof feeders were proposed by Animal Protection of New Mexico (APNM), Inc. as a method for excluding birds at dairies and cattle feeding facilities in that State. This method would involve the installation of 1/8" thick steel panel feed troughs, covered by parallel 4-6 inch spaced steel cables or wires running from the outer top edge of the trough up at a 30-45 degree angle to the top of the head chutes that cattle use to access the feed. Vertical canvas strips would be hung from the cables. The feeder was reportedly designed for use with horses. A copy of a diagram of this system was sent to Mr. Jim Glahn, Bird Control Research Biologist at the WS-National Wildlife Research Center (NWRC), who has nearly 12 years of experience researching problems caused by starlings at livestock feeding operations. He found the following:

- A major flaw in the design is the spacing of the cables at 4-6" which would allow starlings to drop through. Reducing the spacing to 2" as recommended by Johnson and Glahn (1994) would likely interfere with the delivery of feed to the troughs. Interference would occur because the feed mixture currently used by most dairies is a mixture of chopped alfalfa hay and corn silage with a grain component. The alfalfa/corn silage portion would likely hang up on the cable or wire strands of the troughs and much would fall outside the troughs, with increased feed waste a result (Twedt and Glahn 1982).

- the spacing of the canvas strips is not specified, and canvas would deteriorate quickly from cattle licking and weather (Twedt and Glahn 1982).

Mr. Glahn expressed the opinion, based on Twedt and Glahn (1982) and Feare (1984), that exclusion methods to reduce starling depredations at livestock feeding operations are usually the least cost-effective solution. Despite the above concerns about the bird-proof feeder system recommended by APNM, Inc., similar types of systems could be recommended by WS under the current program should any become available that are effective, practical, and economically feasible for producers to implement.

3.4 STANDARD OPERATING PROCEDURES FOR BIRD DAMAGE MANAGEMENT TECHNIQUES

The current WS program, nationwide and in Iowa has developed SOPs for its activities that reduce the potential impacts of these actions on the environment. These procedures are discussed in detail in Chapter 5 of the ADC Final EIS (USDA 1997). Some key mitigating measures pertinent to the proposed action and alternatives of this EA that are also incorporated into WS' SOPs include:

- The WS Decision Model thought process which is used to identify effective and appropriate wildlife damage management strategies and their effects.

- EPA-approved label directions are followed for all pesticide use. The registration process for chemical pesticides is intended to assure minimal adverse effects to the environment when chemicals are used in accordance with label directions.

- All WS Specialists in the State using restricted chemicals are trained and certified by, or operate under the direct supervision of, program personnel or others who are experts in the safe and effective use of chemical BDM materials.

- The presence of non-target species is monitored before using DRC-1339 (or Starlicide) to control starlings and pigeons at feedlots to reduce the risk of mortality of non-target species populations.

- Research is being conducted to improve BDM methods and strategies so as to increase selectivity for target species, to develop effective non-lethal control methods, and to evaluate non-target hazards and environmental effects.

Some additional mitigating factors specific to the current program include:

- Management actions would be directed toward localized populations or groups of target species and/or individual offending members of those species. Generalized population suppression across the State, or even across major portions of the State, would not be conducted.

- WS uses BDM devices and conducts activities for which the risk of hazards to public safety and hazard to the environment have been determined to be low according to a formal risk assessment (USDA 1997, Appendix P). Where such activities are conducted on private lands or other lands of restricted public access, the risk of hazards to the public is even further reduced.

- WS personnel are trained and experienced to select the most appropriate method for taking problem animals and excluding non-target animals.

- Observations of birds feeding at feedlots, dairies, or starling staging areas or observations of birds that are associated with pigeon concentrations are made to determine if non-target or T&E species

would be at risk from BDM activities. Alternatives and application strategies are used that minimize risks to nontarget species.

- WS has consulted with the USFWS regarding potential effects of control methods on T&E species and abides by reasonable and prudent alternatives (RPAs) and/or reasonable and prudent measures (RPMs) established as a result of that consultation. For the full context of the Biological Opinion, see the ADC Final EIS, Appendix F (USDA 1997). .

- WS has consulted with IDNR regarding potential risks to state-listed threatened and endangered species. Measures and alternatives designed to protect State listed species will be implemented to avoid adverse impacts on state-listed T&E species.

- WS uses chemical methods for BDM that have undergone rigorous research to prove their safety and lack of serious effects on non-target animals and the environment.

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

4.0 INTRODUCTION

Chapter 4 provides information needed for making informed decisions in selecting the appropriate alternative for meeting the purpose of the proposed action. This chapter analyzes the environmental consequences of each alternative in relation to the issues identified for detailed analysis in Chapter 2. This section analyzes the environmental consequences of each alternative in comparison with the no action alternative to determine if the real or potential effects would be greater, lesser, or the same.

The following resource values within the State are not expected to be significantly impacted by any of the alternatives analyzed: soils, geology, minerals, water quality/quantity, flood plains, wetlands, visual resources, air quality, prime and unique farmlands, aquatic resources, timber, and range. These resources will not be analyzed further.

Cumulative Effects: Discussed in relationship to each of the alternatives analyzed, with emphasis on potential cumulative effects from methods employed, and including summary analyses of potential cumulative impacts to target and non-target species, including T&E species.

Irreversible and Irretrievable Commitments of Resources: Other than minor uses of fuels for motor vehicles and other materials, there are no irreversible or irretrievable commitments of resources.

Effects on sites or resources protected under the National Historic Preservation Act: WS BDM actions are not undertakings that could adversely affect historic resources (See Section 1.1.5).

4.1 ENVIRONMENTAL CONSEQUENCES FOR ISSUES ANALYZED IN DETAIL

4.1.1 Effects on Target Bird Species Populations

4.1.1.1 Alternative 1: Only Technical Assistance

Under this alternative, the WS program would be limited to providing advice on BDM. WS would not provide any operational assistance with BDM activities and, therefore, would have no impact on sparrow, pigeon, and starling populations in the State. Private efforts to reduce or prevent bird damage and perceived disease transmission risks could increase, which could result in similar or even greater effects on those populations than the Proposed Action. However, for the same reasons shown below in the population effects analysis in section 4.1.1.2, it is unlikely that target bird populations would be adversely impacted by implementation of this alternative. It is hypothetically possible that frustration caused by the inability to reduce damage and associated losses could lead to illegal use of other chemicals which could lead to real but unknown effects on target bird populations. DRC-1339 and the tranquilizer alpha-chloralose are currently only available for use by WS employees and would not be available for use under this alternative. Starlicide (similar to DRC-1339) and Avitrol would be available for use by registered pesticide applicators.

4.1.1.2 Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Analysis of this issue is limited to those species killed during WS BDM activities. The analysis for magnitude of impact generally follows the process described in Chapter 4 of USDA (1997). Magnitude is described in USDA (1997) as "*. . . a measure of the number of animals killed in relation to their abundance.*" Magnitude may be determined either quantitatively or qualitatively.

Quantitative determinations are based on population estimates, allowable harvest levels, and actual harvest data. Qualitative determinations are based on population trends and harvest data when available. Generally, WS only conducts damage management on species whose population densities are high and usually only after they have caused damage.

Table 4-1. Number of pigeons, starlings and sparrows lethally removed by USDA APHIS Wildlife Services in Iowa during Federal Fiscal Years 1999 to 2003.

Fiscal Year	Number of Pigeons	Number of Starlings	Number of Sparrows
1999	375	202	0
2000	643	14	0
2001	674	10	28
2002	1,016	11	232
2003	522	0	180

Breeding Bird Surveys. Trends in bird abundance can be monitored by using data from the Breeding Bird Surveys (BBS). The BBS is a large-scale inventory of North American birds coordinated by the U.S. Geological Survey, Patuxent Wildlife Research Center (Sauer et al 2003). The BBS is a combined set of over 3,700 roadside survey routes primarily covering the continental United States and southern Canada. The BBS was started in 1966, and routes are surveyed in June by experienced birders. The stated primary objective of the BBS has been to generate an estimate of population change for all breeding birds. Populations of birds tend to fluctuate, especially locally, as a result of variable annual local habitat and climatic conditions. Trends can be determined using different population equations, and statistically tested to determine if a trend is significant. The statistical significance of a trend's "change" is reflected in the calculated P-value (probability) for that species. P-values lower than 0.05 are generally considered statistically significant.

The BBS data is best used to monitor population trends. However, the average number of birds per route (relative abundance) can be used to theoretically estimate the population size (relative abundance/10 mi^2 x 56,276 (total land/water area in Iowa)). To use these population estimates the following assumptions would need to be accepted.

1. All birds within a quarter mile of the observer are seen at all stops on a BBS route; this assumption is faulty because observers often cannot see a quarter mile in radius at all stops due to obstructions such as hills, trees, and brush and because some bird species can be very elusive. Therefore, the number of birds seen per route would provide a conservative estimate of the population.
2. The chosen survey routes are totally random and are fully representative of available habitats. When BBS routes are established, survey rules allow the observers to make stops for surveys based on better quality habitat or convenient parking areas, even though the survey sites are supposed to be spaced a half-mile apart. Therefore, if survey areas had stops with excellent food availability, the count survey could be biased. This would tend to overestimate the population. However, if these sites were not on a route at all, the population could be underestimated.
3. Birds are equally distributed throughout the survey area and routes were randomly selected. Routes are randomly picked throughout the State, but are placed on the nearest available road. Therefore, the starting point is picked for accessibility by vehicle. However a variety of habitat types are typically covered since most BBS routes are selected because they are "off the beaten path" to allow observers to hear birds without interruption from vehicular noise.

Christmas Bird Counts. The National Audubon Society (NAS) conducts nationwide bird surveys in December to early January (the NAS Christmas Counts). The Christmas Bird Counts (CBC) reflect the number of birds frequenting the state during the winter months. Like the BBS data, CBC data do not provide a population estimate, but can be used as an indicator of trends in the population. Researchers have found that population trends reflected in CBC data tend to correlate well with those from censuses taken by more stringent means (National Audubon Society 2002).

European Starling Population Effects

Colonization of North America by the European starling began on March 6, 1890 when a Mr. Eugene Scheifflin, a member of the Acclimatization Society, released 80 starlings into New York's Central Park. The birds thrived and exploited their new habitat. By 1918, the advance line of migrant juveniles extended from Ohio to Alabama; by 1926 from Illinois to Texas; by 1941 from Idaho to New Mexico; and by 1946 to California and Canadian coasts (Miller 1975). In just 50 short years the starling had colonized the United States and expanded into Canada and Mexico and 80 years after the initial introduction had become one of the most common birds in North America (Feare 1984).

Precise counts of starling populations do not exist but one estimate placed the nationwide starling population at an estimated at 140 million birds (Johnson and Glahn 1994). Natural mortality in starling populations is between 50% and 65% of the population each year, regardless of human-caused control operations (USDA 1997). Therefore the estimated natural mortality of starlings in the eastern U.S should be between 70 and 91 million birds annually. Based upon an anticipated increase in requests for services, WS' lethal management of starlings in Iowa would be expected to be no more than approximately 100,000 starlings in any one year under the Proposed Action.

Breeding Bird Survey trend data from 1980-2003 indicate that starling populations in Iowa have had a non-signficiant decreasing population trend (-1.5% per year, P=0.08), a decreasing population trend for the central BBS Region (-1.0% per year, P =0.03) and a stable trend nationwide (-0.2% per year, P=0.21; Sauer et al. 2004). Iowa Christmas Bird Count data appear to indicate relatively stable trend in wintering populations of starlings (National Audubon Society 2003). Based on BBS data, starlings are the third most abundant bird species in IA. With a relative abundance of 62.32, a total Iowa summer starling population could be estimated at approximately 361,900 birds.

Starlings are non-indigenous and often have negative impacts on and competition with native birds. Therefore, starlings are considered by many wildlife biologists and ornithologists to be an undesirable component of North American wild and native ecosystems. Any reduction in starling populations in North America, even to the extent of complete eradication, could be considered a beneficial impact to native bird species.

Based on the above described population information, the localized nature of WS' starling removals and WS limited lethal take of starlings in Iowa, WS should have minimal effects on statewide and regional starling populations.

Rock Dove (Pigeon) Population Effects

Rock doves, also known as domestic pigeons, are a non-native species that were first introduced into the United States by settlers as a domestic bird to be used for sport, carrying messages, and as a source of food (USFWS 1981). Many of these birds escaped and eventually formed the feral pigeon populations that are now found throughout the United States, southern Canada, and Mexico (Williams and Corrigan 1994). Because pigeons are an introduced rather than a native species, they are not protected by Federal law.

Pigeons are highly dependent on humans to provide them with food and sites for roosting, loafing, and nesting (Williams and Corrigan 1994). Thus, they are commonly found around city buildings, bridges, parks, farm yards, grain elevators, feed mills, and other manmade structures (Williams and Corrigan 1994). Additionally, although pigeons are primarily grain and seed eaters, they will readily feed on garbage, livestock manure, spilled grains, insects, and any other available bits of food (Williams and Corrigan 1994).

Breeding Bird Survey trend data from 1980-2003 indicate that pigeon populations have decreased at an annual rate of 3.3% in Iowa ($P < 0.01$), the central BBS region (2.6%, $P < 0.01$) and the U.S. (1.5%, $P < 0.01$; Sauer et al. 2004). With a relative abundance of 16.89 from BBS data, the Iowa pigeon population may be estimated at 98,000 birds. Iowa Christmas Bird Count data from 1980-2003 shows a relatively stable population trend for wintering populations of pigeons throughout the state (National Audubon Society 2003).

Federal law does not protect this species. Iowa law establishes a pigeon hunting season from October 1 to March 31, except within 100 yards of buildings and bridges. Any WDM involving lethal control actions by WS for this species would be restricted to isolated, individual sites, or communities within 100 yards of buildings and bridges. While most control activity will be conducted within 100 yards of building and bridges, state approval will be obtained for control activities beyond that distance that involve shooting from April 1 to September 30. In those cases where pigeons are causing damage or are a nuisance, complete removal of the local population could be achieved. As stated above, pigeons are an nonnative species and are perceived as an undesirable component of North American ecosystems by some wildlife biologists, ornithologists, and naturalists.

Based upon an anticipated increase in requests for services, WS' lethal management of pigeons in Iowa would be expected to be no more than approximately 5,000 pigeons in any one year under the Proposed Action. Based on the above information, the localized nature of WS pigeon reduction efforts and WS limited lethal take of pigeons in Iowa, WS should have minimal effects on local, statewide, regional or continental pigeon populations.

House Sparrow Population Effects

House sparrows, or English sparrows, were introduced to North America from England in 1850 and have spread throughout the continent (Fitzwater 1994). The species is not protected by Federal or Iowa state laws. Like starlings and pigeons, sparrows' negative effects on and competition with native bird species makes them a undesirable component of North American ecosystems in the eyes of wildlife biologists, ornithologists, and naturalists. Sparrows are found in nearly every habitat except dense forest, alpine, and desert environments. They prefer human-altered habitats, and are abundant on farms and in cities and suburbs (Robbins et al. 1973).

Breeding Bird Survey (BBS) trend data from 1980-2003 indicate that sparrow populations have decreased at an annual rate of 2.5%, 4.0%, and 3.7% throughout Iowa, the central BBS region, and the U.S, respectively ($P < 0.01$, Sauer et al. 2004). With a relative abundance of 166.39, a total Iowa summer sparrow population could be estimated at approximately 966,300 birds. Iowa Christmas Bird Count data from 1966-2003 shows decreasing population trend for wintering populations of sparrows throughout the state (National Audubon Society 2003). However, despite

their decreasing population trend, relative abundance data from the BBS survey indicate that house sparrows are the second most abundant bird species in Iowa.

Changes in farming practices may have been a factor for their recent population decrease for sparrows. The considerable decline in small farms and associated disappearance of a multitude of small feed lots, stables and barns, may have reduced sparrow populations, as these sites were a primary source of food in the early part of the 20th century. Ehrlich et al. (1988) suggested that sparrow population declines might be linked to the dramatic decrease during the 20th century in the presence of horses as transport animals. Grain rich horse droppings were apparently a major food source for this species.

Based upon an anticipated increase in requests for services, WS' lethal management of sparrows in Iowa would be expected to be no more than approximately 1,000 sparrows in any one year under the Proposed Action. Based on the above information and WS limited lethal take of sparrows in Iowa, WS should have minimal effects on local, statewide, regional or continental sparrow populations.

4.1.1.3 Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS would not take any target species because no lethal methods would be used. Although WS lethal take of sparrows, pigeons, and starlings would not occur, it is likely that private BDM efforts would increase. Impacts of private BDM efforts could have similar or even greater effects on target species populations than those of the current program alternative depending upon the training and experience of the person conducting the BDM. For the same reasons shown in the population effects analysis in section 4.1.1.2, however, it is unlikely that target bird populations would be adversely impacted by implementation of this alternative. It is hypothetically possible that frustration caused by the inability to reduce damage and associated losses could lead to illegal use of other chemicals which could lead to real but unknown effects on target bird populations. DRC-1339 is currently only available for use by WS employees and would not be available for use under this alternative. Starlicide (similar to DRC-1339) and Avitrol would be available for use by registered pesticide applicators. Effects and hypothetical risks of illegal chemical toxicant use under this alternative would probably be about the same as those under Alternative 1, but less than Alternative 4.

4.1.1.4 Alternative 4: No Bird Damage Management by WS

Under this alternative, WS would have no impact on sparrow, pigeon, and starling populations in the State. Private efforts to reduce or prevent depredations could increase which could result in effects on target species populations to an unknown degree. Effects on target species under this alternative could be the same, less, or more than those of the proposed action depending on the level of effort expended by private persons. For the same reasons shown in the population effects analysis in section 4.1.1.2, it is unlikely that target bird populations would be adversely impacted by implementation of this alternative. It is hypothetically possible that frustration caused by the inability to reduce damage and associated losses could lead to illegal use of other chemicals which could lead to real but unknown effects on target bird populations. DRC- 1339 and the tranquilizer alpha-chloralose are currently only available for use by WS employees and would not be available for use under this alternative.

4.1.2 Effects on Other Wildlife Species, including T&E Species

4.1.2.1 Alternative 1: Only Technical Assistance

Alternative 1 would not allow any WS direct operational BDM in Iowa. Non-target or T&E species would not be impacted by WS activities from this alternative. Technical assistance or self-

help information would be provided upon request. Although technical support might lead to more selective use of control methods by private parties than that which might occur under Alternative 4, private efforts to reduce or prevent depredations could still result in less experienced persons implementing control methods, leading to greater risks to non-target wildlife than under the proposed action. It is hypothetically possible that, similar to Alternative 3 and 4, frustration caused by the inability to reduce damage and associated losses could lead to illegal use of chemical toxicants which could have unknown effects on local non-target species populations, including some T&E species. Hazards to raptors, including bald eagles, could therefore be greater under this alternative if chemicals that are less selective or that cause secondary poisoning hazards are used by frustrated private individuals.

4.1.2.2 Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Adverse Effects on Non-target (non-T&E) Species. There have been no deaths of non-target species by WS while conducting BDM activities in Iowa. Although it is possible that some non-target birds may be unknowingly killed by use of DRC-1339 for pigeon or starling control, the method of application is designed to minimize or eliminate that risk. For example, DRC-1339 treated bait is only applied after a period of prebaiting with untreated bait material and when non-target birds are not observed coming to feed at the site. WS take of non-target species during BDM activities is expected to be extremely low to non-existent.

While every precaution is taken to safeguard against taking non-target birds, changes in local flight patterns and other unanticipated events can result in the incidental take of unintended species. These occurrences are rare and should not affect the overall populations of any species under the current program.

Beneficial Effects on Non-target Species. Interspecific nest competition has been well documented in starlings. Miller (1975) and Barnes (1991) reported starlings were responsible for a severe depletion of the eastern bluebird (*Sialis sialis*) population due to nest competition. Nest competition by starlings has also been known to adversely impact American kestrels (sparrow hawks) (Von Jarchow 1943, Nickell 1967, and Wilmer 1987), red-bellied woodpeckers (*Centurus carolinus*), Gila woodpeckers (Centurus uropygial is) (Kerpez et.al. 1990 and Ingold 1994), and wood ducks (*Aix sponsa*) (Shake 1967, McGilvery et.al 1971, Heusmann et.al. 1977, and Grabill 1977). Weitzel (1988) reported nine native species of birds in Nevada had been displaced by starling nest competition, and Mason et al. (1972) reported starlings evicting bats from nest holes. Control operations as proposed in this alternative could reduce starling populations on a local level. Reduction in nest site competition would be a beneficial impact on the species listed above.

T&E Species Effects. Special efforts are made to avoid jeopardizing T&E species through biological evaluations of the potential effects and the establishment of special restrictions or mitigation measures. WS has obtained the list of federally listed T&E species for the state of Iowa (Appendix C). The nationwide WS program has consulted with the USFWS under Section 7 of the ESA concerning potential impacts of BDM methods on T&E species and has obtained a Biological Opinion. For the full context of the Biological Opinion, see Appendix F of the ADC Final EIS (USDA 1997, Revised, Appendix F). The USFWS determined that the management activities being utilized for WS BDM activities are not likely to adversely affect these listed species. WS has determined that the use of BDM methods will have no effect on those T&E species not included in the 1992 BO or their critical habitats.

Additionally, as stated in the 1992 BO, the USFWS has determined that the only BDM method that might adversely affect the bald eagle was above ground use of strychnine treated bait for "nuisance birds." Strychnine is no longer registered for above ground use and would not be used by WS for BDM in the State. DRC-1339/Starlicide poses no primary hazard to eagles because

eagles do not eat grain or other bait materials on which this chemical might be applied during BDM, and further, because eagles are highly resistant to DRC-1339 - up to 100 mg doses were force fed to captive golden eagles with no mortality or adverse effects noted other than regurgitation and head-shaking (Larsen and Dietrich 1970). Secondary hazards to raptors from DRC-1339/Starlicide and Avitrol are low to nonexistent (see Appendix B). Therefore, WS BDM in Iowa is not likely to adversely affect bald eagles.

WS has obtained and reviewed the list of Iowa State listed T&E species, species of special concern and has consulted with IDNR regarding potential risks to State listed T&E species. The Iowa Department of Natural resources has concurred with this determination.

Standard operating procedures used to avoid impacts on T&E species are described in Chapter 3 and in Appendix B. The inherent safety features of DRC-1339/Starlicide and Avitrol use that preclude or minimize hazards to mammals and plants are described in Appendix B and in a formal risk assessment in the ADC Final EIS (USDA 1997, Appendix P). Those measures and characteristics should assure there would be no jeopardy to T&E species or adverse effects on mammalian or non-T&E bird scavengers from the proposed action.

4.1.2.3 Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS take of non-target animals would be less than that of the proposed action because no lethal control actions would be taken by WS. However, if bird damage problems were not effectively resolved by non-lethal control methods, members of the public may resort to other means of lethal control such as the use of shooting or even illegal use of chemical toxicants. Cumulative impacts are likely to be similar to or slightly higher than for the preferred alternative. This could result in less experienced persons implementing control methods and could lead to greater risks to non-target wildlife than the proposed action. For example, shooting by persons not proficient at bird identification could lead to killing of non-target birds. It is hypothetically possible that frustration caused by the inability to reduce damage and associated losses could lead to illegal use of chemical toxicants which could lead to unknown effects on local non-target species populations, including T&E species. Secondary poisoning hazards to raptors, including bald eagles and falcons, could therefore be greater under this alternative if chemicals that are less selective or that cause secondary poisoning are used by frustrated private individuals.

4.1.2.4 Alternative 4: No Bird Damage Management by WS

Alternative 4 would not allow any WS BDM in the State. There would be no impact on non-target or T&E species by WS BDM activities from this alternative. However, private efforts to reduce or prevent depredations could increase which could result in less experienced persons implementing control methods and could lead to greater take of non-target wildlife than under the proposed action. WS would not be providing technical or operational assistance, so risks from use of BDM methods by less experiences individuals are greatest for this alternative. It is hypothetically possible that frustration caused by the inability to reduce damage and associated losses could lead to illegal use of chemical toxicants which could impact local non-target species populations, including some T&E species. Hazards to raptors, including bald eagles, could therefore be greater under this alternative if chemicals that are less selective or that cause secondary poisoning are used by private individuals.

4.1.3 Effects on Human Health and Safety

4.1.3.1 Effects of Chemical BDM Methods on Human Health

Alternative 1: Only Technical Assistance

Alternative 1 would not allow any direct operational BDM assistance by WS in the State. Concerns about human health risks from WS' use of chemical BDM methods would be alleviated because no such use would occur. DRC-1339 and alpha-chloralose are only registered for use by WS personnel and would not be available for use by private individuals. Private efforts to reduce or prevent damage would be expected to increase, resulting in less experienced persons implementing damage management methods and leading to a greater risk than the Proposed Action alternative. However, because some of these private parties would be receiving advice and instruction from WS, concerns about human health risks from chemical BDM methods use should be less than under Alternative 4. Commercial pest control services would be able to use Avitrol and Starlicide and such use would likely occur to a greater extent in the absence of WS' assistance. Use of Avitrol and Starlicide in accordance with label requirements should preclude any hazard to members of the public. Hazards to humans and pets could be greater under this alternative if chemicals that are less selective or that cause secondary poisoning are used. It is hypothetically possible that frustration caused by the inability to alleviate bird damage could lead to illegal use of certain toxicants that, unlike WS' controlled use of DRC- 1339 and Avitrol, could pose secondary poisoning hazards to pets. Some chemicals that could be used illegally could present greater risks of adverse effects on humans than those used under the Proposed Action alternative.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

DRC-1339 DRC-1339 is the primary lethal chemical BDM method that would be used under the proposed program alternative. Some concern has been generated by a few members of the public that unknown, but significant, risks to human health may exist from DRC-1339 used for BDM.

This chemical is one of the most extensively researched and evaluated pesticides ever developed. Over 30 years of studies have demonstrated the safety and efficacy of this compound. Appendix B provides more detailed information on this chemical and its use in BDM. Factors that virtually eliminate any risk of public health problems from use of this chemical are:

- Its use is prohibited within 50 feet of standing water and cannot be applied directly to food or feed crops.
- DRC-1339 is highly unstable and degrades rapidly when exposed to sunlight, heat, or ultraviolet radiation. The half-life is about 25 hours, which means that treated bait material generally is nearly 100% broken down within a week.
- It is more than 90% metabolized in target birds within the first few hours after they consume the bait. Therefore, little material is left in bird carcasses that may be found or retrieved by people.
- Application rates are extremely low (less than 0.1 lb. of active ingredient per acre) (EPA 1995).
- A human would need to ingest the internal organs of birds found dead from DRC-1339 to have any chance of receiving even a minute amount of the chemical or its metabolites into his/her system. This is highly unlikely to occur.
- The EPA has concluded that, based on mutagenicity (the tendency to cause gene mutations in cells) studies, this chemical is not a mutagen or a carcinogen (i.e., cancer-causing agent) (EPA 1995). Notwithstanding, the extremely controlled and limited circumstances in which DRC-1339 is used would prevent any exposure of the public to this chemical.

The above analysis, and the risk assessment in USDA 1997, Revised, Appendix P indicate that human health risks from DRC-1339 use would be virtually nonexistent under any alternative.

Avitrol (4-Aminopyridine). Avitrol is another chemical method that might be used by WS in BDM. Appendix B provides more detailed information on this chemical.

Avitrol is available as a prepared grain bait mixture or as a powder. It is formulated in such a way that ratios of treated baits to untreated baits are no greater than 1:9. Factors that virtually eliminate health risks to members of the public from use of this product as an avicide are:

- It is readily broken down or metabolized into removable compounds that are excreted in urine in the target species (ETOXNET 1996). Therefore, little of the chemical remains in killed birds to present a hazard to humans.

- A human would need to ingest the internal organs of birds found dead from Avitrol ingestion to have any chance of receiving even a minute amount of the chemical or its metabolites into his/her system. This is highly unlikely to occur. Furthermore, secondary hazard studies with mammals and birds have shown that there is virtually no hazard of secondary poisoning.

- Although Avitrol has not been specifically tested as a cancer-causing agent, the chemical was found not to be mutagenic in bacterial organisms (EPA 1997). Therefore, the best scientific information available indicates it is not a carcinogen. Notwithstanding, the extremely controlled and limited circumstances in which Avitrol is used would prevent exposure of members of the public to this chemical.

The above analysis and the risk assessment in USDA 1997, Revised, Appendix P, indicate that human health risks from Avitrol use would be virtually nonexistent under any alternative.

Other BDM Chemicals. Other non-lethal BDM chemicals that might be used or recommended by WS would include repellents such as methyl or di-methyl anthranilate (artificial grape flavoring used in foods and soft drinks sold for human consumption), which has been used as an area repellent; anthraquinone which is presently marketed as Flight Control®; and the tranquilizer drug alpha-chloralose. Such chemicals must undergo rigorous testing and research to prove safety, effectiveness, and low environmental risks before they would be registered by the EPA or Food and Drug Administration (FDA). Any operational use of chemical repellents would be in accordance with labeling requirements under FIFRA and state pesticide laws and regulations which are established to avoid unreasonable adverse effects on the environment. Following labeling requirements and use restrictions are a built-in mitigation measure that would assure that use of registered chemical products would avoid significant adverse effects on human health.

Based on a thorough Risk Assessment, APHIS concluded that, when WS program chemical methods are used in accordance with label directions, they are highly selective to target individuals or populations, and such use has negligible effects on the environment (USDA 1997).

Alternative 3: Only Non-lethal Bird Damage Management

If Alternative 3 is selected, WS would agree to not use lethal BDM methods in the State. WS could only implement non-lethal methods such as harassment and exclusion devices and materials. Non-lethal methods could, however, include the tranquilizer drug alpha-chloralose and chemical repellents such as methyl anthranilate which, although already considered safe for human consumption because it is artificial grape flavoring, which might nonetheless raise concerns about

human health risks. Such chemicals must undergo rigorous testing and research to prove safety, effectiveness, and low environmental risks before they would be registered by the EPA or FDA. Any operational use of chemical repellents and tranquilizer drugs would be in accordance with labeling requirements under FIFRA and state pesticide laws and regulations and FDA rules which are established to avoid unreasonable adverse effects on the environment. Following labeling requirements and use restrictions are a built-in mitigation measure that would assure that use of registered chemical products would avoid significant adverse effects on human health.

Excessive cost or ineffectiveness of non-lethal techniques could result in some entities rejecting WS' assistance and resorting to other means of BDM. Such means could include illegal or inappropriate pesticide uses. Hazards to humans and pets could be greater under this alternative if chemicals that are less selective or that cause secondary poisoning are used or if approved chemicals are used incorrectly. It is hypothetically possible that frustration caused by the inability to alleviate bird damage could lead to illegal use of certain toxicants that, unlike WS' controlled use of DRC-1339 and Avitrol, could pose secondary poisoning hazards to pets.

Alternative 4: No Bird Damage Management by WS

Under Alternative 4 WS would not provide any assistance with BDM in Iowa. Concerns about human health risks from WS' use of chemical BDM methods would be alleviated because no such use would occur. DRC- 1339 and alpha-chloralose are only registered for use by WS personnel and would not be available for use by private individuals. Private efforts to reduce or prevent damage would be expected to increase, resulting in less experienced persons implementing damage management methods and potentially leading to greater risk to human health and safety than the proposed action alternative. Commercial pest control services would be able to use Avitrol and Starlicide and such use would likely occur to a greater extent in the absence of WS' assistance. Use of Avitrol and Starlicide in accordance with label requirements should preclude any hazard to members of the public. However, hazards to humans and pets could be greater under this alternative if other chemicals that are less selective or that cause secondary poisoning are used. It is hypothetically possible that frustration caused by the inability to alleviate bird damage could lead to illegal use of certain toxicants that, unlike WS' controlled use of DRC- 1339 and Avitrol, could pose secondary poisoning hazards to pets. Some chemicals that could be used illegally could present greater risks of adverse effects on humans than those used under the current program alternative.

4.1.3.2 Effects of Non-chemical BDM Methods on Human Safety

Alternative 1: Only Technical Assistance

Under this alternative, WS would not engage in direct operational use of any non-chemical BDM methods. Risks to human safety from WS' use of firearms and pyrotechnics would hypothetically be lower than the Proposed Action alternative, since WS would not be conducting direct control activities. Hazards to humans and property could be greater under this alternative if personnel conducting BDM activities using non-chemical methods are poorly or improperly trained.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Non-chemical BDM methods that might raise safety concerns include shooting with firearms and harassment with pyrotechnics. Firearms are only used by WS personnel who are specially trained and experienced in using these methods. WS personnel receive safety training on a periodic basis to keep them aware of safety concerns. The Iowa WS program has had no accidents involving the use of firearms or pyrotechnics in which a member of the public was harmed. A formal risk assessment of WS' operational management methods found that risks to human safety were low

(USDA 1997, Appendix P). Therefore, no adverse affects on human safety from WS' use of these methods is expected.

Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, non-chemical BDM methods that might raise safety concerns include shooting with firearms when used as a harassment technique and harassment with pyrotechnics. Firearms are only used by WS personnel who are experienced in handling and using them. WS personnel receive safety training on a periodic basis to keep them aware of safety concerns. The Iowa WS program has had no accidents involving the use of firearms or pyrotechnics in which a member of the public was harmed. A formal risk assessment of WS' operational management methods found that risks to human safety were low (USDA 1997, Appendix P). Therefore, no adverse affects on human safety from WS' use of these methods is expected.

Alternative 4: No Bird Damage Management by WS

Alternative 4 would not allow any WS BDM in the State. Concerns about human health risks from WS' use of non-chemical BDM methods would be alleviated because no such use would occur. Private efforts to reduce or prevent damage would be expected to increase, resulting in less experienced persons implementing damage management methods and potentially leading to greater risk to human health and safety than the proposed action alternative. Commercial pest control services would be able to use pyrotechnics or firearms in BDM programs and this activity would likely occur to a greater extent in the absence of WS' assistance. Hazards to humans and property could be greater under this alternative if personnel conducting BDM activities using non-chemical methods are poorly or improperly trained.

4.1.3.3 Effects on Human Health and Safety from Birds

Alternative 1: Only Technical Assistance

With WS technical assistance but no direct management, entities requesting BDM assistance for human health concerns would either take no action, which means the risk of human health problems would likely continue or increase in each situation as bird numbers are maintained or increased; or implement WS recommendations for non-lethal and lethal control methods. Potential impacts would be variable. Individuals or entities that implement management actions may or may not have the experience necessary to efficiently and effectively conduct an effective BDM program. In some situations the implementation of non-lethal controls such as electric or porcupine wires, netting barriers, and harassment could actually increase the risk of human health problems at other sites by causing the birds to move to other urban roosting sites not previously affected. This potential risk would be less likely under this alternative than Alternative 4 if people experiencing damage receive and accept WS technical assistance recommendations.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

People are concerned with potential injury, illness, and loss of human life as a result of the potential impacts of injurious bird species. The integrated BDM strategy, combining lethal and non-lethal techniques, that would be used under this alternative has the greatest potential to reduce this risk. All BDM methods could possibly be implemented and recommended by WS.

An IWDM approach reduces damage or threats to public health or safety for people who would have no relief from such damage or threats if exclusive use of lethal or non-lethal methods were ineffective or impractical. As discussed in Chapter 1, birds are a threat to aviation safety and can also carry or transmit diseases to humans. In most cases, it is difficult to conclusively prove that birds were responsible for transmission of individual human cases or outbreaks of bird-borne

diseases. Nonetheless, certain requesters of BDM service may consider this risk to be unacceptable and may request such service primarily for that reason. In such cases, BDM, either by lethal or non-lethal means, would, if successful, reduce the risk of bird-borne disease transmission at the site where BDM is requested.

In some situations the implementation of non-lethal controls such as electric or porcupine wires, netting barriers, and harassment could actually increase the risk of human health problems at other sites by causing the birds to move to other urban roosting sites not previously affected. In such cases, lethal removal of the birds may actually be the best alternative from the standpoint of overall human health concerns in the local area. If WS is providing direct operational assistance in relocating birds, coordination with local authorities may be conducted to assure they do not reestablish in other undesirable locations.

Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS would be restricted to implementing and recommending only non-lethal methods in providing assistance with bird damage problems. The success or failure of the use of non-lethal methods can be quite variable. In some situations the implementation of non-lethal controls such as electric or porcupine wires, netting barriers, and harassment could actually increase the risk of human health problems at other sites by causing the birds to move to other urban roosting sites not previously affected. Some requesting entities, such as city government officials, would reject WS assistance for this reason and would likely seek to achieve bird control by other means. However, if WS is providing direct operational assistance in relocating birds, coordination with local authorities may be conducted to assure they do not re-establish in other undesirable locations. Habituation (animals learning there is no real threat associated with an otherwise frightening stimulus) will limit the period of efficacy for frightening devices. Unlike Alternative 2, this alternative would not allow for the limited use of lethal techniques (e.g., shooting) to reduce problems with bird habituation to frightening devices.

Alternative 4: No Bird Damage Management by WS

With no WS assistance, cooperators would be responsible for developing and implementing their own BDM program. Depending upon the experience level of the individual conducting BDM, there may be a greater potential of not reducing bird hazards, than under the proposed action. In some situations the implementation of non-lethal controls such as electric or porcupine wires, netting barriers, and harassment could actually increase the risk of human health problems at other sites by causing the birds to move to other urban roosting sites not previously affected. Under this alternative, human health problems could increase if private individuals were unable to find and implement effective means of controlling birds that cause damage problems.

4.1.4 Impacts to Stakeholders, including Aesthetics

4.1.4.1 Effects on Human Affectionate Bonds with Individual Birds and on Aesthetic Values of Wild Bird Species

Alternative 1: Only Technical Assistance

Under this alternative, WS would not conduct any direct operational BDM, but would still provide technical assistance or self-help advice to persons requesting assistance with bird damage. Individuals opposed to direct operational assistance in wildlife damage management by the government, but favor government technical assistance, would favor this alternative. Persons who have developed affectionate bonds with individual wild birds would not be affected by WS' activities under this alternative because the individual birds would not be killed by WS. However, other private entities would likely conduct BDM activities similar to those that would no longer be

conducted by WS, which means the effects would then be similar to the Proposed Action alternative.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Those who routinely view or feed individual birds, such as pigeons, would likely be disturbed by removal of such birds under the current program. WS is aware of such concerns and takes these concerns into consideration to mitigate effects. WS may be able to mitigate such concerns by leaving certain birds that have been identified by interested individuals.

This alternative would be offensive and morally objectionable to members of the public who have expressed opposition to the killing of any birds during BDM activities. Under this Proposed Action alternative, some lethal control of birds would occur and these persons would be opposed. However, many persons who voice opposition have no direct connection or opportunity to view or enjoy the particular birds that would be killed by WS' lethal control activities. Lethal control actions would generally be restricted to local sites and to small, unsubstantial percentages of overall populations. Therefore, the species subjected to limited lethal control actions would remain common and abundant and would, therefore, continue to remain available for viewing by persons with that interest.

Lethal removal of birds from airports should not affect the public's enjoyment of the aesthetics of the environment since airport properties are closed to public access.

Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS would not conduct any lethal BDM, but may harass birds that are causing damage. People who oppose lethal control of wildlife by the government, but are tolerant of government involvement in non-lethal wildlife damage management would favor this alternative. Persons who have developed affectionate bonds with individual wild birds would not be affected by the death of individual birds under this alternative, but might oppose dispersal or translocation of certain birds. WS may be able to mitigate such concerns by leaving certain birds that have been identified by interested individuals. In addition, the abundant populations of target bird species in urban environments would enable people to continue to view them and to establish affectionate bonds with individual wild birds. Although WS would not perform any lethal activities under this alternative, other private entities would likely conduct BDM activities similar to those that would no longer be conducted by WS, which means the effects would then be similar to the proposed action alternative.

Alternative 4: No Bird Damage Management by WS

Under this alternative, WS would not conduct operational BDM or provide technical assistance. Those in opposition to any government involvement in wildlife damage management would favor this alternative. Persons who have developed affectionate bonds with individual wild birds would not be affected by WS' activities under this alternative. However, other private entities would likely conduct BDM activities similar to those that would no longer be conducted by WS, which means the effects would then be similar to the proposed action alternative.

4.1.4.2 Effects on Aesthetic Values of Property Damaged by Birds

Alternative 1: Only Technical Assistance

Depening upon the actions of individuals and organizations experiencing damage, the lack of operational assistance in reducing bird problems could result in an increase of potential adverse

affects on aesthetic values. However, potential adverse affects would likely be less than as those under Alternative 4, since WS would be providing technical assistance.

Relocation of nuisance roosting or nesting populations of birds (e.g., starling roosts) through harassment, barriers, or habitat alteration can sometimes result in the birds causing the same problems at the new location. If WS has only provided technical assistance to local residents or municipal authorities, coordination with local authorities to monitor the birds' movements to assure the birds do not reestablish in other undesirable locations might not be conducted, thereby increasing the potential of adverse effects to nearby property owners.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action)

Under this alternative, operational assistance in reducing bird problems, in which droppings from the birds cause an unsightly mess, would improve aesthetic values of affected properties. In addition, individuals objecting to the presence of invasive nonnative species, such as starlings, domestic feral pigeons, and sparrows, and whose aesthetic enjoyment of other birds is diminished by the presence of such species, will be positively affected by programs which result in reductions in the presence of such birds.

Relocation or dispersal of nuisance roosting or nesting populations of birds (e.g., starling roosts) by harassment can sometimes result in the birds causing the same or similar problems at the new location. If WS is providing direct operational assistance in relocating such birds, coordination with local authorities may be conducted to assure they do not re-establish in other undesirable locations.

Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, WS would be restricted to non-lethal methods only. Relocation or dispersal of nuisance roosting or nesting populations of birds (e.g., starling roosts) by harassment can sometimes result in the birds causing the same or similar problems at the new location. If WS is providing direct operational assistance in relocating such birds, coordination with local authorities may be conducted to try and assure they do not re-establish in other undesirable locations. In situations where efforts to prevent birds from causing problems in a new location fail, this alternative could result in more property owners experiencing adverse effects on the aesthetic values of their properties than the Proposed Action alternative.

Alternative 4: No Bird Damage Management by WS

Under this alternative, the lack of any operational or technical assistance in reducing bird problems would mean aesthetic values of some properties would continue to be adversely affected if the property owners were not able to achieve BDM some other way.

Relocation of nuisance roosting or nesting population of birds (e.g., starling roosts) through harassment, barriers, or habitat alteration can sometimes result in the birds causing the same problems at the new location. Coordination of dispersal activities by local residents with local authorities to monitor the birds' movements to assure the birds do not re-establish in other undesirable locations might not be conducted, thereby increasing the potential of adverse effects to nearby property owners.

4.1.5 Humaneness and Animal Welfare Concerns of Methods Used

4.1.5.1 Alternative 1: Only Technical Assistance

Under this alternative, WS would only provide self-help advice. Lethal methods, viewed as inhumane by some persons, would not be used by WS. Without WS direct operational assistance, it is expected that many requesters of BDM would seek alternative sources of assistance with lethal and nonlethal bird damage management. DRC-1339 would no longer be available as it is only registered for use by or under the direct supervision of WS personnel. Thus, the only chemical BDM methods legally available would be Avitrol and Starlicide. The use of Avitrol may be viewed by many persons as less humane than DRC-1339 or Starlicide. Improper or illegal use of both chemicals would likely be viewed as inhumane by the public. Similar to the proposed action shooting; and live trapping/capture and euthanization by decapitation, cervical dislocation, or CO_2 gas could be used by these entities. Overall, BDM under this alternative would likely be somewhat less humane than the Proposed Action alternative, but slightly more humane than Alternative 4.

4.1.5.2 Alternative 2: Implement an Integrated Bird Damage Management Program (Proposed Action/No Action)

Under this alternative, methods viewed by some persons as inhumane would be used in BDM by WS. These methods would include shooting and toxicants/chemicals such as DRC-1339 and Avitrol.

Shooting, when performed by experienced professionals, usually results in a quick death for target birds. Occasionally, however, under field conditions it is not always possible to get a perfect shot and occasionally a bird must be shot a second time or be or caught by hand and then dispatched or euthanized. Some persons would view shooting as inhumane.

The primary lethal chemical BDM method that would be used by WS under this alternative would be DRC-1339. This chemical causes death resulting from uremic poisoning and congestion of major organs (Decino et al. 1966). The birds become listless and lethargic, and a quiet death normally occurs in 24 to 72 hours following ingestion. Depending upon individual perceptions, the method may be seen as resulting in a less stressful death than that which probably occurs by most natural causes, such as by disease, starvation, or predation. For these reasons, WS considers DRC-1339 use to be a relatively humane method of lethal BDM. However, some persons will view any method that takes a number of hours to cause death as inhumane and unacceptable.

The chemical Avitrol repels birds by poisoning a few members of a flock, causing them to become hyperactive. Their distress calls generally alarm the other birds and cause them to leave the site. Only a small number of birds need to be affected to cause alarm in the rest of the flock. The affected birds generally die. In most cases where Avitrol is used, only a small percentage of the birds are affected and killed by the chemical with the rest being merely dispersed. In experiments to determine suffering, stress, or pain in affected animals, Rowsell, et. al. (1979) tested Avitrol on pigeons and observed subjects for clinical, pathological, or neural changes indicative of pain or distress. None were observed. Conclusions of the study were that the chemical met the criteria for a humane pesticide. Notwithstanding, some persons would view Avitrol as inhumane treatment of the birds that are affected by it based on the birds' distress-like behavior.

Occasionally, birds captured alive by use of the tranquilizer Alpha-chloralose, cage traps, by hand, or with nets would be euthanized. The most common method of euthanization would be by decapitation, cervical dislocation, or CO_2 gas which are described and approved by AVMA as humane euthanasia methods (Beaver et al. 2001). Most people would view AVMA-approved euthanization methods as humane.

4.1.5.3 Alternative 3: Only Non-lethal Bird Damage Management

Under this alternative, lethal methods, viewed as inhumane by some persons, would not be used by WS. However, it is expected that many requesters of BDM assistance would reject non-lethal methods recommended by WS and/or would not be willing to pay the extra cost of implementing and maintaining them and would seek alternative lethal means. DRC-1339 would not be available to non-WS entities; however, Avitrol and Starlicide would be legal for use by certified pest control operators. Avitrol would most likely be viewed as less humane than DRC-1339 or Starlicide because of the distress-like behaviors that it causes. Shooting could be used by non-WS entities and, similar to the current program alternative, would be viewed by some persons as inhumane. Live trapping/capture and euthanization by decapitation, cervical dislocation, or CO_2 gas could also be used by these entities.

4.1.5.4 Alternative 4: No Bird Damage Management by WS

Under this alternative, methods viewed as inhumane by some persons would not be used by WS. Similar to Alternatives 1 and 3, DRC-1339 would no longer be available for use since it is only registered for use by or under the direct supervision of WS personnel. However, Avitrol and Starlicide would be legal for use by certified pest control operators. Avitrol would most likely be viewed as less humane than DRC-1339 or Starlicide because of the distress behaviors that it causes. Shooting could be used by non-WS entities and, similar to the proposed action alternative, would be viewed by some persons as inhumane. Live trapping/capture and euthanasia by decapitation, cervical dislocation, or CO_2 gas could also be used by these entities.

4.2 CUMULATIVE IMPACTS

Cumulative impacts, as defined by CEQ (40 CFR 1508.7), are impacts to the environment that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts may result from individually minor, but collectively significant, actions taking place over time.

Under Alternatives 1, 2 and 3, WS would address damage associated with birds in a number of situations throughout the State. The WS BDM program would be the primary federal program with BDM responsibilities; however, some state and local government agencies may conduct BDM activities in Iowa as well. Through ongoing coordination with these agencies, WS is aware of such BDM activities and may provide technical assistance in such efforts. WS does not normally conduct direct damage management activities concurrently with such agencies in the same area, but may conduct BDM activities at adjacent sites within the same time frame. In addition, commercial pest control companies may conduct BDM activities in the same area. The potential cumulative impacts analyzed below could occur either as a result of WS BDM program activities over time, or as a result of the aggregate effects of those activities combined with the activities of other agencies and individuals.

Cumulative Impacts on Wildlife Populations

Bird Damage Management methods used or recommended by the WS program in Iowa will likely have no cumulative adverse effects on target and non-target wildlife populations. WS limited lethal take of target bird species is anticipated to have minimal impacts on target bird populations in Iowa, the region and the U.S. When control actions are implemented by WS the potential lethal take of non-target wildlife species is expected to be minimal to non-existent.

Cumulative Impact Potential from Chemical Components

BDM programs which include the use of pesticides as a lethal population management component may have the greatest potential for cumulative impacts on the environment as such impacts relate to deposit of chemical residues in the physical environment and environmental toxicosis. The avicides, DRC-1339 and

Starlicide, and the frightening agent, Avitrol, are the only chemicals used or recommended by the Iowa WS BDM program for the purpose of obtaining lethal effects on birds. These chemicals have been evaluated for possible residual effects which might occur from buildup of the chemicals in soil, water, or other environmental sites.

> ***DRC-1339*** exhibits a low persistence in soil or water, and bioaccumulation of the chemical is unlikely (USDA 1997). Additionally, the relatively small quantity of DRC-1339 that will be used in BDM programs in Iowa, the chemical's instability which results in speedy degradation of the product, and application protocol used in WS programs further reduces the likelihood of any environmental accumulation. DRC-1339 is not used by any other entities in Iowa.
>
> ***Starlicide*** is similar to DRC-1339 used in feedlots; however, it contains less active ingredient (USDA 1997, Appendix P). Therefore, the cumulative impact potential from Starlicide use should be similar to DRC-1339.
>
> ***Avitrol*** may be used or recommended by the Iowa WS program. Most applications would not be in contact with soil, applications would not be in contact with surface or ground water, and uneaten baits will be recovered and disposed of according to EPA label specifications. Avitrol exhibits a high persistence in soil and water but, according to literature, does not bioaccumulate (USDA 1997 and EXTOXNET 2000). Because of Avitrol's characteristic of binding to soils, it is not expected to be present in surface or ground water as a result of its use on land (EPA 1980). A combination of chemical characteristics and baiting procedures used by WS would reduce the likelihood of environmental accumulation of Avitrol. The EPA has not required studies on the fate of Avitrol in the soil because, based on use patterns of the avicide, soil residues are expected to be low (EPA 1980).

Based on use patterns, the chemical and physical characteristics of DRC-1339, Starlicide, and Avitrol, and factors related to the environmental fate of these pesticides, no cumulative impacts are expected from the lethal chemical components used or recommended by the WS BDM program in Iowa.

Non-lethal chemicals may also be used or recommended by the WS BDM program in Iowa. Characteristics of these chemicals and use patterns indicate that no significant cumulative impacts related to environmental fate are expected from their use in WS BDM programs in Iowa.

Cumulative Impact Potential from Non-chemical Components

Non-chemical methods used or recommended by WS BDM program in may include exclusion through use of various barriers, habitat modification of structures or vegetation, live trapping and translocation or euthanasia of birds, harassment of birds or bird flocks, and shooting.

> ***Lead Shot.*** Threats of lead toxicosis to waterfowl from the deposition of lead shot in waters where such species fed were observed more than one hundred years ago (Sanderson and Belrose 1986). As a result of discoveries made regarding impacts to several species of ducks and geese, federal restrictions were placed on the use of lead shot for waterfowl hunting in 1991. "Beginning September 1, 1991, the contiguous 48 United States, and the States of Alaska and Hawaii, the Territories of Puerto Rico and the Virgin Islands, and the territorial waters of the United States, are designated for the purpose of Sec. 20.21 (j) as nontoxic shot zones for hunting waterfowl, coots, and certain other species. 'Certain other species' refers to those species, other than waterfowl or coots, affected by reason of being included in aggregate bags and concurrent seasons."
>
> All WS BDM shooting activities conform to federal, state and local laws. If activities are conducted near or over water, WS uses steel shot during activities. Consequently, no deposition of lead in nontoxic shot zones is likely to occur as a result of WS BDM actions in Iowa.

Therefore, cumulative impacts are not likely to occur if toxic shot is used. Additionally, WS will evaluate other BDM actions which entail the use of shot on a case by case basis to determine if deposition of lead shot poses any risk to non-target animals, such as domestic livestock. If such risk exists, WS will use nontoxic shot in those situations.

Roost Harassment/Relocation. Some potential exists for cumulative impacts to human health and safety related to the harassment of roosting bird flocks such as starlings in urban environments. If birds are dispersed from one site and relocate to another where human exposure to concentrations of bird droppings over time occurs, human health and safety could be threatened. If WS is providing direct operational assistance in relocating such birds, coordination with local authorities may be conducted to assure they do not re-establish in other undesirable locations.

4.3 SUMMARY

No significant cumulative environmental impacts are expected from any of the 4 alternatives. Under the Proposed Action, the lethal removal of birds by WS would not have a significant impact on overall starling, pigeon, and sparrow populations in Iowa, but some local reductions may occur. No risk to public safety is expected when WS' services are provided and accepted by requesting individuals in Alternatives 1, 2, and 3, since only trained and experienced wildlife biologists/specialists would conduct and recommend BDM activities. There is a slight increased risk to public safety when persons who reject WS assistance and recommendations in Alternatives 1 and 3 and conduct their own BDM activities, and when no WS assistance is provided in Alternative 4. However, as discussed above, the increases in risk associated with the actions of private individuals are unlikely to would not be to the point that the impacts would be significant. Although some persons will likely be opposed to WS' participation in BDM activities on public and private lands within the state of Iowa, the analysis in this EA indicates that WS Integrated BDM program will not result in significant cumulative adverse impacts on the quality of the human environment. Table 4-2 summarizes the expected impact of each of the alternatives on each of the issues.

Table 4-2. Summary of Potential Impacts.

Issues	Alternative 1 Only Technical Assistance	Alternative 2 Integrated Bird Damage Management Program (Proposed Action/No Action)	Alternative 3 Only Non-lethal Bird Damage Management	Alternative 4 No Bird Damage Management by WS
Target Species Effects	No effect by WS. Low effect - reductions in local starling, pigeon, and sparrow numbers by non-WS personnel likely; would not significantly affect state and regional populations.	Low effect - reductions in local starling, pigeon, and sparrow numbers; would not significantly affect state and regional populations	Low effect by WS - reductions in local starling, pigeon, and sparrow numbers by non-WS personnel likely; would not significantly affect state and regional populations.	No effect by WS. Low effect - reductions in local starling, pigeon, sparrow numbers by non-WS personnel likely; would not significantly affect state and regional populations
Effects on Other Wildlife Species, Including T&E Species	No effect by WS. Impacts by non-WS personnel would be variable.	Low effect - methods used by WS would be highly selective with very little risk to non-target species.	Low effect by WS - methods used by WS would be highly selective with very little risk to non-target species. Impacts by non-WS personnel would be variable.	No effect by WS. Impacts by non-WS personnel would be variable.

Issues	Alternative 1 Only Technical Assistance	Alternative 2 Integrated Bird Damage Management Program (Proposed Action/No Action)	Alternative 3 Only Non-lethal Bird Damage Management	Alternative 4 No Bird Damage Management by WS
Human Health and Safety Risks	Efforts by non-WS personnel to reduce or prevent conflicts could result in less experienced persons implementing control methods, leading to a greater potential of not reducing bird damage than under the proposed action.	The proposed action has the greatest potential of successfully reducing this risk.	Nonlethal methods are not always successful in resolving damage problems. In these situations this alternative may be less successful than Alternative 2 depending upon the actions of individuals experiencing damage.	Efforts by non-WS personnel to reduce or prevent conflicts could result in less experienced persons implementing control methods, leading to a greater potential of not reducing bird damage than under the proposed action.
Aesthetic Enjoyment of Birds	Low to moderate effect. Local bird numbers in damage situations would remain high or possibly increase unless non-WS personnel successfully implement lethal methods; no adverse affect on overall regional and state starling, pigeon and sparrow populations.	Low to moderate effect at local levels; Some local populations may be reduced; WS bird damage management activities do not adversely affect overall regional or state starling, pigeon, and sparrow populations. Viewing opportunities would be available for those willing to look in alternative locations.	Low to moderate effect. Local bird numbers in damage situations would remain high or possibly increase when non-lethal methods are ineffective unless non-WS personnel successfully implement lethal methods; no adverse affect on overall regional and state starling, pigeon, and sparrow populations.	Low to moderate effect. Local bird numbers in damage situations would remain high or possibly increase unless non-WS personnel successfully implement lethal methods; no adverse affect on overall regional and state starling, pigeon, and sparrow populations.
Aesthetic Damage Caused by Birds	Moderate to High effect - birds may move to other sites which can create aesthetic damage problems at new sites.	Low effect - bird damage problems most likely to be resolved without creating or moving problems elsewhere.	Moderate to High effect - birds may move to other sites which can create aesthetic damage problems at new sites. Less likely than Alt. 1 and 4.	High effect - bird problems less likely to be resolved without WS involvement. Birds may move to other sites which can create aesthetic damage problems at new sites
Humaneness Concerns of Methods Used	No effect by WS. Impacts by non-WS personnel would be variable.	Low to moderate effect - methods viewed by some people as inhumane would be used by WS.	Lower effect than Alt. 2 since only non-lethal methods would be used by WS. Impacts by non-WS personnel would be variable.	No effect by WS. Impacts by non-WS personnel would be variable.

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APPENDIX A
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APPENDIX B

BIRD DAMAGE MANAGEMENT METHODS AVAILABLE FOR USE OR RECOMMENDATION BY THE IOWA WILDLIFE SERVICES PROGRAM

NON-LETHAL, NON-CHEMICAL METHODS

Agricultural producer and property owner practices. These consist primarily of non-lethal preventive methods such as cultural methods and habitat modification. Cultural methods and other management techniques are implemented by the agricultural producer or property owners/managers. Resource owners/managers may be encouraged to use these methods, based on the level of risk, need, and professional judgment on their effectiveness and practicality. These methods include:

> **Cultural methods.** Cultural methods may include altering planting dates so that crops are not young and vulnerable to damage when the damage-causing species are present, or the planting of crops that are less attractive or less vulnerable to such species. At feedlots or dairies, cultural methods generally involve modifications to the level of care or attention given to livestock, which may vary depending on the age and size of the livestock. Animal husbandry practices include, but are not limited to, techniques such as night feeding, indoor feeding, closed barns or corrals, removal of spilled grain or standing water, and use of bird proof feeders (Johnson and Glahn 1994).
>
> **Environmental/Habitat modification** can be an integral part of BDM. Wildlife production and/or presence is directly related to the type, quality, and quantity of suitable habitat. Therefore, habitat can be managed to reduce or eliminate the production or attraction of certain bird species or to repel certain birds. In most cases, the resource or property owner is responsible for implementing habitat modifications, and WS only provides advice on the type of modifications that have the best chance of achieving the desired effect. Habitat management is most often a primary component of BDM strategies at or near airports to reduce bird-aircraft strike hazards by eliminating bird nesting, roosting, loafing, or feeding sites. Generally, many bird problems on airport properties can be minimized through management of vegetation and water from areas adjacent to aircraft runways. Habitat management is often necessary to minimize damage caused by starlings that form large roosts during late autumn and winter. Bird activity can be greatly reduced at roost sites by removing all the trees or selectively thinning the stand.

Animal behavior modification. This refers to tactics that alter the behavior of wildlife to reduce damage. Animal behavior modification may involve use of scare tactics or fencing to deter or repel animals that cause loss or damage (Twedt and Glahn 1982). Some of the methods included in this category are:

- Bird-proof barriers
- Electronic guards
- Propane exploders
- Pyrotechnics
- Distress Calls and sound producing devices
- Chemical frightening agents
- Repellents
- Scare crows
- Mylar tape
- Lasers
- Eye-spot balloons

These techniques are generally only practical for small areas. Scaring devices such as distress calls, helium-filled eye-spot balloons, raptor effigies and silhouettes, mirrors, and moving disks can be effective, but usually for only a short time before birds become accustomed and learn to ignore them (Schmidt and Johnson 1984, Bomford 1990, Rossbach 1975, Graves and Andelt 1987, Mott 1985, Shirota et al. 1983, Conover 1982, Arhart 1972). Mylar tape has produced mixed results in its effectiveness to frighten birds (Dolbeer et al. 1986, Tobin et al. 1988).

Bird proof barriers can be effective, but are often cost-prohibitive as the aerial mobility of birds usually requires overhead barriers as well as peripheral fencing or netting. Exclusionary devices, adequate to stop bird movements, can also restrict movements of livestock, people and other wildlife (Fuller-Perrine and Tobin 1993). Netting can be used to exclude birds from a specific area by the placement of bird-proof netting over and around the specific resource to be protected. Exclusion may be impractical in most settings (e.g., commercial agriculture); however, it can be practical in small areas (e.g., personal gardens) or for high-value crops (e.g., grapes) (Johnson 1994). Although this alternative would provide short-term relief from damage, it may not completely deter birds from feeding, loafing, staging, or roosting at that site. The public often finds exclusionary devices, such as netting, unsightly and fear the devices will lower the aesthetic value of the property when used over personal gardens.

Auditory scaring devices such as propane exploders, pyrotechnics, electronic guards, scarecrows, and audio distress/predator vocalizations are effective in many situations for dispersing damage-causing bird species. These devices are sometimes effective, but usually only for a short period of time before birds become accustomed and learn to ignore them (Schmidt and Johnson 1984, Bomford 1990, Rossbach 1975, Mott 1985, Shirota and Masake 1983, and Arhart 1972). Williams (1983) reported an approximate 50% reduction in blackbirds at two south Texas feedlots as a result of pyrotechnics and propane cannon use. However, these devices are often not practical in dairy or feedlot situations because of the disturbance to livestock, although livestock can generally be expected to habituate (cease to be frightened) to the noise. Birds, too, quickly learn to ignore scaring devices if the birds' fear of the methods is not reinforced with shooting or other tactics.

Visual scaring techniques such as the use of Mylar tape (highly reflective surface produces flashes of light that startles birds), eye-spot balloons (the large eyes supposedly give birds a visual cue that a large predator is present), flags, lasers, and effigies (scarecrows), are occasionally effective in reducing bird damage. Mylar tape has produced mixed results in its effectiveness to frighten birds (Dolbeer et.al. 1986, and Tobin et.al. 1988). Birds quickly learn to ignore visual and other scaring devices if the birds' fear of the methods is not reinforced with shooting or other tactics.

Lasers are a non-lethal technique recently evaluated by the USDA, APHIS, WS, National Wildlife Research Center (NWRC) (Blackwell et al. 2002, Glahn et al. 2000). For best results and to disperse numerous birds from a roost, the laser is most effectively used in periods of low light, such as after sunset and before sunrise. In the daytime, the laser can also be used during overcast conditions or in shaded areas to move individual and small numbers of birds, although the effective range of the laser is much diminished. Blackwell et al. (2002) tested lasers on several bird species and observed varied results among species. Lasers were ineffective at dispersing pigeons and mallard with birds habituating in approximately 5 minutes and 20 minutes, respectively (Blackwell et al. 2002). As with other BDM tools, lasers are most effective when used as part of an integrated management program.

Nest destruction is the removal of nesting materials during the construction phase of the nesting cycle. Nest destruction is generally only applied when dealing with a single bird or very few birds. This method is used to discourage birds from constructing nests in areas which may create nuisances for home and business owners. Heusmann and Bellville (1978) reported that nest removal was an effective, but time-consuming method because problem bird species are generally abundant and highly mobile and can easily return to damage sites from long distances. This method poses no imminent danger to pets or the public.

Lure crops/alternate foods. When depredations cannot be avoided by careful crop selection or modified planting schedules, lure crops can sometimes be used to mitigate the loss potential. Lure crops are planted or left for consumption by wildlife as an alternative food source. This approach provides relief for critical crops by sacrificing less important or specifically planted fields. Establishing lure crops is sometimes expensive, requires considerable time and planning to implement, and may attract other unwanted species to the area.

NON-LETHAL, CHEMICAL METHODS

Methyl anthranilate (artificial grape flavoring used in foods and soft drinks for human consumption) could be used or recommended by WS as a bird repellent. Methyl anthranilate (MA) (artificial grape flavoring food additive) has been shown to be a promising repellent for many bird species (Dolbeer et al. 1993). Cummings et al. (1995) found effectiveness of MA declined significantly after 7 days. Belant (1996) found MA ineffective as a bird grazing repellent, even when applied at triple the recommended label rate. MA is also under investigation as a potential bird taste repellent. MA may become available for use as a livestock feed additive (Mason et al. 1984; Mason et al. 1989). It is registered for applications to turf or to surface water areas used by unwanted birds. The material has been shown to be nontoxic to bees (LD_{50} > 25 micrograms/bee[3]), nontoxic to rats in an inhalation study (LC_{50} > 2.8 mg/L[4]), and of relatively low toxicity to fish and other invertebrates. Methyl anthranilate is naturally occurring in concord grapes and in the blossoms of several species of flowers and is used as a food additive and perfume ingredient (Dolbeer et al. 1992; RJ Advantage, Inc. 1997). It has been listed as "Generally Recognized as Safe" (GRAS) by the FDA (Dolbeer et al. 1992).

Water surface and turf applications of MA are generally considered expensive. For example, the least intensive application rate required by label directions is 20 lbs. of product (8 lbs. active ingredient) per acre of surface water at a cost of about $64/lb., with retreating required every 3-4 weeks (RJ Advantage, Inc. 1997). The cost of treating turf areas would be similar on a per acre basis. Also, MA completely degrades in about 3 days when applied to water (RJ Advantage, Inc. 1997), which indicates the repellent effect is short-lived.

Another potentially more cost-effective method of MA application is by use of a fog-producing machine (Vogt 1997). The fog drifts over the area to be treated and is irritating to the birds while being non-irritating to any humans that might be exposed. Fogging applications must generally be repeated 3-5 times after the initial treatment before the birds abandon a treatment site (Dr. P. Vogt, RJ Advantage, Inc., Pers. Comm. 1997). Applied at a rate of about .25 l./acre of water surface, the cost is considerably less than when using the turf or water treatment methods.

MA is also being investigated as a livestock feed additive to reduce or prevent feed consumption by birds. Such chemicals undergo rigorous testing and research to prove safety, effectiveness, and low environmental risks before they would be registered by EPA or the FDA.

Particulate feed additives have been investigated for their bird-repellent characteristics. In pen trials, European starlings rejected grain to which charcoal particles were adhered (L. Clark, NWRC, Pers. Comm. 1999). If further research finds this method to be effective and economical in field application, it may become available as a bird repellent on livestock feed. Charcoal feed additives have been explored for use in reducing methane production in livestock and should have no adverse effects on livestock, on meat or milk production, or on human consumers of meat or dairy products (L. Clark, NWRC, Pers. Comm. 1999).

Other chemical repellents. A number of other chemicals have shown bird repellent capabilities. Anthraquinone, a naturally occurring chemical found in many plant species and in some invertebrates as a natural predator defense mechanism, has shown effectiveness in protecting rice seed from red-winged blackbirds and boat-tailed grackles (Avery et al. 1997). It has also shown effectiveness as a foraging repellent against Canada goose grazing on turf and

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[3] An LD_{50} is the dosage in milligrams of material per kilogram of body weight, or, in this case in micrograms per individual bee, required to cause death in 50% of a test population of a species.

[4] An LC_{50} is the dosage in milligrams of material per liter of air required to cause death in 50% of a test population of a species through inhalation.

as a seed repellent against brown-headed cowbirds (Dolbeer et al. 1998). It is not currently registered for use with any of the target species listed in this EA. Compounds extracted from common spices used in cooking and applied to perches in cage tests have been shown repellent characteristics against roosting European starlings (Clark 1997). Naphthalene (moth balls) was found to be ineffective in repelling European starlings (Dolbeer et al. 1988).

Tactile repellents. A number of tactile repellent products are on the market which reportedly deter birds from roosting on certain structural surfaces by presenting a tacky or sticky surface that the birds avoid. However, experimental data in support of this claim are sparse (Mason and Clark 1992). The repellency of tactile products is generally short-lived because dust tends to stick to the product. Additionally, tactile repellents may not be aesthetically pleasing and may require expensive clean-up costs as the material may run down the sides of buildings in hot weather.

LETHAL, MECHANICAL METHODS

Shooting is more effective as a dispersal technique than as a way to reduce bird densities when large numbers of birds are present. Normally, shooting is conducted with shotguns, rifles, or air rifles. Shooting is a very target-specific method and is normally used to remove a single offending bird. However, at times, a few birds could be shot from a flock to make the remainder of the birds more wary and to help reinforce non-lethal methods. Shooting can be relatively expensive because of the staff hours sometimes required (USDA 1997). It is selective for target species and may be used in conjunction with the use of spotlights, decoys, and calling. Shooting with shotguns, air rifles, or rim and center fire rifles is sometimes used to manage bird damage problems when lethal methods are determined to be appropriate. The birds are killed as quickly and humanely as possible. WS complies with all firearm safety precautions when conducting BDM activities and all laws and regulations governing the lawful use of firearms are strictly followed.

Firearm use is a very sensitive issue with the public because of concerns relating to public safety and misuse of firearms. To ensure safe use and awareness, WS employees who use firearms to conduct official duties are required to attend an approved firearms safety and use training program within 3 months of their appointment and a refresher course every 2 years afterwards (WS Directive 2.615). WS employees who carry firearms as a condition of employment, are required to sign a form certifying that they meet the criteria as stated in the *Lautenberg Amendment* which prohibits firearm possession by anyone who has been convicted of a misdemeanor crime of domestic violence.

Live traps include (although live traps are non-lethal, birds may be euthanized upon capture):

Decoy traps are used by WS for preventive and corrective damage management. Decoy traps are similar in design to the Australian Crow Trap as reported by Johnson and Glahn (1994) and McCracken (1972). Live decoy birds of the same species that are being targeted are usually placed in the trap with sufficient food and water to assure their survival. Perches are configured in the trap to allow birds to roost above the ground and in a more natural position. Feeding behavior and calls of the decoy birds attract other birds which enter and become trapped themselves. Active decoy traps are monitored daily, every other day, or as appropriate, to remove and euthanize excess birds and to replenish bait and water. Decoy traps and other cage/live traps, as applied and used by WS, pose no danger to pets or the public and if a pet is accidentally captured in such traps, it can be released unharmed.

Nest box traps may be used by WS for corrective damage management and are effective in capturing local breeding and post breeding European starlings and other targeted secondary cavity nesting birds (DeHaven and Guarino 1969, Knittle and Guarino 1976). Trapped birds are euthanized. Relocation to other areas following live capture would not generally be effective because problem bird species are highly mobile and can easily return to damage sites from long distances; habitats in other areas are generally already occupied; and relocation would most likely result in bird damage problems at the new location. Translocation of wildlife is also discouraged by WS policy (WS Directive 2.501) because of stress to the relocated animal, poor survival rates, and difficulties in adapting to new locations or habitats.

Mist nets are more commonly used for capturing small-sized birds such as house sparrows and finches, but can be used to capture larger birds such as ducks and ring-neck pheasants or even smaller nuisance hawks and owls. This method was introduced into the United States in the 1950's from Asia and the Mediterranean where it was used to capture birds for the market (Day et al. 1980). The mist net is a fine black silk or nylon net, usually 3 to 10 feet wide and 25 to 35 feet long. Net mesh size determines which birds can be caught and overlapping "pockets" in the net cause birds to entangle themselves when they fly into the net.

Cannon nets are normally used for larger birds such as pigeons, feral ducks, and waterfowl and use mortar projectiles to propel a net up and over birds which have been baited to a particular site. This type of net is especially effective for waterfowl that are flightless during the molt and other birds which are typically shy to other types of capture.

Cervical dislocation is sometimes used to euthanize birds which are captured in live traps. The bird is stretched and the neck is hyperextended and dorsally twisted to separate the first cervical vertebrae from the skull. The AVMA approves this technique as humane method of euthanasia and states that cervical dislocation, when properly executed, is a humane technique for euthanasia of poultry and other small birds (Beaver et al. 2001). Cervical dislocation is a technique that may induce rapid unconsciousness, does not chemically contaminate tissue, and is rapidly accomplished (Beaver et al. 2001).

Snap traps are modified rat snap traps used to remove individual woodpeckers, European starlings, and other cavity nesting birds. The trap treadle is baited with peanut butter or other food attractants and attached near the damage area. These traps pose no imminent danger to pets or the public and are usually located in positions inaccessible to people and most non-avian animals. They are very selective because they are usually set in the defended territory of the target birds.

Egg addling/destruction is a method of suppressing reproduction in local nuisance bird populations by destroying egg embryos prior to hatching. Egg addling is conducted by vigorously shaking an egg numerous times, causing detachment of the embryo from the egg sac. Egg destruction can be accomplished in several different ways, but the most commonly used methods are manually gathering eggs and breaking them, or by oiling or spraying the eggs with a liquid which covers the entire egg and prevents the egg from obtaining oxygen (see *Egg oiling* below). Although WS does not commonly use egg addling or destruction, it is a valuable damage management tool and has proven effective in some applications.

LETHAL, CHEMICAL METHODS

All chemicals used by WS are registered as required by the FIFRA (administered by the EPA). WS personnel who use restricted-use chemical methods are certified as pesticide applicators by the Iowa Department of Agriculture and are required to adhere to all certification requirements set forth in FIFRA and Iowa pesticide control laws and regulations. Chemicals are only used on private, public, or tribal property sites with authorization from the property owner/manager.

Avitrol is a chemical frightening agent (repellent) that is effective in a single dose when mixed with untreated baits, normally in a 1:9 ratio. Avitrol, however, is not completely non-lethal in that a small portion of the birds are generally killed (Johnson and Glahn 1994). Prebaiting is usually necessary to achieve effective bait acceptance by the target species. This chemical is registered for use on pigeons, crows, gulls, blackbirds, starlings, and house sparrows in various situations. Avitrol treated bait is placed in an area where the targeted birds are feeding. Usually, a few birds will consume the treated bait and become affected by the chemical. The affected birds then broadcast distress vocalizations and display abnormal flying behavior, thereby frightening the remaining flock away.

Avitrol is a restricted use pesticide that can only be sold to certified applicators and is available in several bait formulations where only a small portion of the individual grains carry the chemical. It can be used anytime of the year, but is used most often during winter and spring. Any granivorous bird associated with the target species could be affected by Avitrol. Avitrol is water soluble, but laboratory studies have demonstrated that Avitrol is strongly

absorbed onto soil colloids and has moderately low mobility. Biodegradation is expected to be slow in soil and water, with a half-life ranging from three to 22 months. However, Avitrol may form covalent bonds with humic materials, which may serve to reduce its availability for intake by organisms from water. It is non-accumulative in tissues and is rapidly metabolized by many species (Schafer 1991).

Avitrol is acutely toxic to avian and mammalian species; however, blackbirds are more sensitive to the chemical and there is little evidence of chronic toxicity. Laboratory studies with predator and scavenger species have shown minimal potential for secondary poisoning, and during field use only magpies and crows appear to have been affected (Schafer 1991). However, a laboratory study by Schafer et al. (1974) showed that magpies exposed to two to 3.2 times the published Lethal Dose (LD_{50}) in contaminated prey for 20 days were not adversely affected and three American kestrels that were fed contaminated blackbirds for seven to 45 days were not adversely affected. Some hazards may occur to predatory species consuming unabsorbed chemical in the GI tract of affected or dead birds (Holler and Shafer 1982, Schafer 1981). A formal Risk Assessment found no probable risk is expected for pets and the public, based on low concentrations and low hazards quotient value for non-target indicator species tested on this compound (USDA 1997, Appendix P).

Alpha-chloralose is a central nervous system depressant used as an immobilizing agent to capture and remove pigeons, waterfowl and other birds. While the product does not kill the birds, all target animals captured using this technique would be euthanized. Use of alpha-chloralose is labor intensive and in some cases, may not be cost effective (Wright 1973, Feare et al. 1981). Alpha-chloralose is typically delivered as a well contained bait in small quantities with minimal hazards to pets and humans; single bread or corn baits are fed directly to the target birds. WS personnel are present at the site of application during baiting to retrieve the immobilized birds. Unconsumed baits are removed from the site following each treatment. Alpha-chloralose was eliminated from more detailed analysis in USDA (1997) based on critical element screening; therefore, environmental fate properties of this compound were not rigorously assessed. However, the solubility and mobility are believed to be moderate and environmental persistence is believed to be low. Bioaccumulation in plants and animal tissue is believed to be low. Alpha-chloralose is used in other countries as an avian and mammalian toxicant. The compound is slowly metabolized, with recovery occurring a few hours after administration (Schafer 1991). The dose used for immobilization is designed to be about two to 30 times lower than the LD_{50}. Mammalian data indicate higher LD_{50} values than birds. Toxicity to aquatic organisms is unknown (Woronecki et al. 1990), but the compound is generally not soluble in water and, therefore, should remain unavailable to aquatic organisms. Factors supporting the determination of this low potential included the lack of exposure to pets, non-target species and the public, and the low toxicity of the active ingredient. Other supporting rationale for this determination included relatively low total annual use and a limited number of potential exposure pathways. The agent is currently approved for use by WS as an Investigative New Animal Drug by the FDA rather than a pesticide.

Egg oiling is a method for suppressing reproduction of nuisance birds by spraying a small quantity of food grade vegetable oil or mineral oil on eggs in nests. The oil prevents exchange of 70gases and causes asphyxiation of developing embryos. It has been found to be 96-100% effective in reducing hatchability. (Pochop 1998; Pochop et al.1998). The method has an advantage over nest or egg destruction in that the incubating birds generally continue incubation and do not renest. The EPA has ruled that use of corn oil for this purpose is exempt from registration requirements under FIFRA. This method is extremely target specific and is less labor intensive than egg addling.

CO2 is sometimes used to euthanize birds which are captured in live traps. Live birds are placed in a container such as a plastic 5-gallon bucket or chamber and sealed shut. CO_2 gas is released into the bucket or chamber and birds quickly die after inhaling the gas. This method is approved as a euthanizing agent by the AVMA (Beaver et al. 2001). CO_2 gas is a byproduct of animal respiration, is common in the atmosphere, and is required by plants for photosynthesis. It is used to carbonate beverages for human consumption and is also the gas released by dry ice. The use of CO_2 by WS for euthanasia purposes is exceedingly minor and inconsequential to the amounts used for other purposes by society.

Starlicide (3-chloro-p-toluidine hydrochloride) is a restricted use pesticide that is formulated as a 0.1% ready-to-use product and is commercially available to certified applicators or persons under their supervision. This avicide may be recommended or used by WS to control ravens, European starlings, crows, pigeons, cowbirds, grackles, magpies, and certain gull species. Starlicide may be used in feedlots, around buildings and fenced non-crop areas, bird staging and roosting areas, federal and state wildlife refuges, and other sites (EPA 1995). Starlicide is similar to DRC-1339 used in feedlots; however, it contains 0.1% DRC-1339 (USDA 1997, Appendix P). Therefore, the properties of this product are similar to DRC-1339 (discussed below).

DRC-1339 (3-chloro-p-toluidine hydrochloride) is the principal chemical method that would be used for bird damage management under the Proposed Action. For more than 30 years, DRC-1339 has proven to be an effective method of starling, blackbird, gull, and pigeon control at feedlots, dairies, airports, and in urban areas (West et al. 1967, Besser et al. 1967, Decino et al. 1966). Studies continue to document the effectiveness of DRC-1339 in resolving blackbird/starling problems at feedlots (West and Besser 1976, Glahn 1982, Glahn et al. 1987), dispersing crow roosts in urban/suburban areas (Boyd and Hall 1987), and Blanton et al. (1992) reports that DRC-1339 appears to be a very effective, selective, and safe means of urban pigeon population reduction. Glahn and Wilson (1992) noted that baiting with DRC-1339 is a cost-effective method of reducing damage by blackbirds to sprouting rice.

DRC-1339 is a slow acting avicide that is registered with the EPA for reducing damage from several species of birds, including blackbirds, starlings, pigeons, crows, ravens, magpies, and gulls. DRC-1339 has several EPA Registration Labels (56228-10, 56228-17, 56228-28, 56228-29, and 56228-30) depending on the application or species involved in the bird damage management project. DRC-1339 was developed as an avicide because of its differential toxicity to mammals. DRC-1339 is highly toxic to sensitive species, but only slightly toxic to non-sensitive birds, predatory birds, and mammals (Johnson et al. 1999, Schafer 1991, 1981). For example, starlings, a highly sensitive species, require a dose of only 0.3 mg/bird to cause death (Royall et al. 1967). Most bird species that are responsible for damage, including starlings, blackbirds, pigeons, crows, magpies, and ravens, are highly sensitive to DRC-1339. Many other bird species such as raptors (Schafer 1981), sparrows, and eagles are classified as non-sensitive. Numerous studies show that DRC- 1339 poses minimal risk of primary poisoning to non-target and T&E species (USDA 1997). Secondary poisoning has not been observed with DRC-1339 treated baits, except crows eating gut contents of pigeons (Kreps 1974). During research studies, carcasses of birds which died from DRC-1339 were fed to raptors and scavenger mammals for 30 to 200 days with no symptoms of secondary poisoning observed (Cunningham et al. 1981). This can be attributed to relatively low toxicity to species that might scavenge on blackbirds and starlings killed by DRC-1339 and its tendency to be almost completely metabolized in the target birds which leaves little residue to be ingested by scavengers. Secondary hazards of DRC-1339 are almost nonexistent (Johnson et al. 1999, Schafer 1991, 1984). DRC-1339 acts in a humane manner producing a quiet and apparently painless death.

DRC-1339 is unstable in the environment and degrades rapidly when exposed to sunlight, heat, or ultra violet radiation. DRC-1339 is highly soluble in water but does not hydrolyze and degradation occurs rapidly in water. DRC-1339 tightly binds to soil and has low mobility. The half life is about 25 hours, which means it is nearly 100% broken down within a week, and identified metabolites (i.e., degradation chemicals) have low toxicity. Aquatic and invertebrate toxicity is low (USDA 1997). Appendix P of USDA (1997) contains a thorough risk assessment of DRC-1339 and the reader is referred to that source for a more complete discussion. That assessment concluded that no adverse effects are expected from use of DRC-1339.

APPENDIX C

FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES IN IOWA

E	Indiana Bat	*Myotis sodalist*
T	Bald Eagle	*Haliaeetus leucocephalus*
E	Pearly Mussel	*Lampsillis higginsi*
T	Piping Plover	*Charadrius melodus*
E	Topeka Shiner	*Notorpis Topeka*
E	Iowa Snail	*Discus macclintocki*
E	Pallid Sturgeon	*Scaphirhynchus albus*
E	Least Tern	*Sterna antillarum*
T	Gray Wolf	*Canis lupus*
T	Northern Wild Monkshood	*Aconitum* noveboracense
T	Mead's Milkweed	*Asclepias meadii*
T	Prairie Bush-clover	*Lespedeza leptostachya*
T	Eastern Prairie Fringed Orchid	*Platanthera leucophaea*
T	Western Prairie Fringed Orchid	*Plantanthera praeclara*

T=Threatened
E=Endangered

APPENDIX D

STATE LISTED THREATENED AND ENDANGERED SPECIES IN IOWA

Endangered animals:

Mammals	
Indiana Bat	Myotis sodalis
Plains Pocket Mouse	Perognathus flavescens
Red-backed Vole	Clethrionomys gapperi
Spotted Skunk	Spilogale putorius
Birds	
Red-shouldered Hawk	Buteo lineatus
Northern Harrier	Circus cyaneus
Peregrine Falcon	Falco peregrinus
Piping Plover	Charadrius melodus
Common Barn Owl	Tyto alba
Least Tern	Sterna antillarum
Bald Eagle	Haliaeetus leucocephalus
King Rail	Rallus elegans
Short-eared Owl	Asio flammeus
Fish	
Lake Sturgeon	Acipenser fulvescens
Pallid Sturgeon	Scaphirhynchus albus
Pugnose Shiner	Notropis anogenus
Weed Shiner	Notropis texanus
Pearl Dace	Semotilus margarita
Freckled Madtom	Noturus nocturnus
Bluntnose Darter	Etheostoma chlorosomum
Least Darter	Etheostoma microperca
Reptiles	
Yellow Mud Turtle	Kinosternon flavescens
Wood Turtle	Clemmys insculpta
Great Plains Skink	Eumeces obsoletus
Copperbelly Water Snake	Nerodia erythrogaster neglecta
Western Hognose Snake	Heterodon nasicus
Copperhead	Agkistrodon contortrix
Prairie Rattlesnake	Crotalus viridis
Massasauga Rattlesnake	Sistrurus catenatus
Amphibians	
Blue-spotted Salamander	Ambystoma laterale
Crawfish Frog	Rana areolata
Butterflies	
Dakota Skipper	Hesperia dacotae
Ringlet	Coenonympha tullia
Land Snails	
Iowa Pleistocene Snail	Discus macclintocki
Minnesota Pleistocene	Ambersnail Novisuccinea new species A
Iowa Pleistocene	Ambersnail Novisuccinea new species B
Frigid Ambersnail	Catinella gelida
Briarton Pleistocene Vertigo	Vertigo briarensis

Bluff Vertigo	Vertigo meramecensis
Iowa Pleistocene Vertigo	Vertigo new species

Fresh Water Mussels

Spectacle Case	Cumberlandia monodonta
Slippershell	Alasmidonta viridis
Buckhorn	Tritogonia verrucosa
Ozark Pigtoe	Fusconaia ozarkensis
Bullhead	Plethobasus cyphyus
Ohio River Pigtoe	Pleurobema sintoxia
Slough Sandshell	Lampsilis teres teres
Yellow Sandshell	Lampsilis teres anodontoides
Higgin's-eye Pearly Mussel	Lampsilis higginsi

Threatened animals:

Mammals

Least Shrew	Cryptotis parva
Southern Bog Lemming	Synaptomys cooperi

Birds

Long-eared Owl	Asio otus
Henslow's Sparrow	Ammodramus henslowii

Fish

Chestnut Lamprey	Ichthyomyzon castaneus
American Brook Lamprey	Lampetra appendix
Grass Pickerel	Esox americanus
Blacknose Shiner	Notropis heterolepis
Topeka Shiner	Notropis topeka
Western Sand Darter	Ammocrypta clara
Black Redhorse	Moxostoma duquesnei
Burbot Lota lota	
Orangethroat Darter	Etheostoma spectabile

Reptiles

Slender Glass Lizard	Ophisaurus attenuatus
Common Musk Turtle	Sternotherus odoratus
Blanding's Turtle	Emydoidea blandingii
Ornate Box Turtle	Terrapene ornata
Diamondback Water Snake	Nerodia rhombifera
Western Worm Snake	Carphophis amoenus vermis
Speckled Kingsnake	Lampropeltis getulus

Amphibians

Mudpuppy	Necturus maculosus
Central Newt	Notophthalmus viridescens

Butterflies

Powesheik Skipperling	Oarisma powesheik
Byssus Skipper	Problema byssus
Mulberry Wing	Poanes massasoit
Silvery Blue	Glaucopsyche lygdamus
Baltimore	Euphydryas phaeton

Snails

Midwest Pleistocene Vertigo	Vertigo hubrichti
Occult Vertigo	Vertigo occulta

Fresh Water Mussels	
Cylinder	Anodontoides ferussacianus
Strange Floater	Strophitus undulatus
Creek Heelsplitter	Lasmigona compressa
Purple Pimpleback	Cyclonaias tuberculata
Butterfly	Ellipsaria lineolata
Ellipse	Venustaconcha ellipsiformis

Endangered plants:

COMMON NAME	SCIENTIFIC NAME
Pale false foxglove	Agalinus skinneriana
Blue giant-hyssop	Agastache foeniculum
Bearberry	Arctostaphylos uva-ursi
Black chokeberry	Aronia melanocarpa
Eared milkweed	Asclepias engelmanniana
Mead's milkweed	Asclepias meadii
Narrow-leaved milkweed	Asclepias stenophylla
Ricebutton aster	Aster dumosus
Large-leaved aster	Aster macrophyllus
Schreber's aster	Aster schreberi
Fern-leaved false foxglove	Aureolaria pedicularia
Matricary grape fern	Botrychium matricariifolium
Poppy mallow	Callirhoe triangulata
Cordroot sedge	Carex chordorrhiza
Large-bracted corydalis	Corydalis curvisiliqua
Silky prairie-clover	Dalea villosa
Swamp-loosestrife	Decodon verticillatus
Northern panic-grass	Dichanthelium boreale
Roundleaved sundew	Drosera rotundifolia
False mermaid	Floerkea proserpinacoides
Bog bedstraw	Galium labradoricum
Povertygrass	Hudsonia tomentosa
Northern St. Johnswort	Hypericum boreale
Pineweed	Hypericum gentianoides
Winterberry	Ilex verticillata
Black-based quillwort	Isoetes melanopoda
Water-willow	Justicia americana
Dwarf dandelion	Krigia virginica
Cleft conobea	Leucospora multifida
Whiskbroom parsley	Lomatium foeniculaceum
Running clubmoss	Lycopodium clavatum
Bog clubmoss	Lycopodium inundatum
Annual skeletonweed	Lygodesmia rostrata
Water marigold	Megalodonta beckii
Northern lungwort	Mertensia paniculata
Bigroot pricklypear	Opuntia macrorhiza
Clustered broomrape	Orobanche fasciculata
Ricegrass	Oryzopsis pungens
Cinnamon fern	Osmunda cinnamomea
Purple cliffbrake	Pellaea atropurpurea
Arrow arum	Peltandra virginica
Pale green orchid	Platanthera flava
Eastern prairie fringed orchid	Platanthera leucophaea
Clammyweed	Polansia jamesii
Crossleaf milkwort	Polygala cruciata
Purple milkwort	Polygala polygama
Jointweed	Polygonella articulata

Douglas' knotweed	Polygonum douglasii
Three-toothed cinquefoil	Potentilla tridentata
Canada plum	Prunus nigra
Frenchgrass	Psoralea onobrychis
Pink shinleaf	Pyrola asarifolia
Prickly rose	Rosa acicularis
Meadow spikemoss	Selaginella eclipes
Rough-leaved goldenrod	Solidago patula
Bog goldenrod	Solidago uliginosa
Yellow-lipped ladies-tresses	Spiranthes lucida
Pickering morning-glory	Stylisma pickeringii
Rough-seeded fameflower	Talinum rugospermum
Waxy meadowrue	Thalictrum revolutum
Long beechfern	Thelypteris phegopteris
Large-leaved violet	Viola incognita
Rusty woodsia	Woodsia ilvensis
Yellow-eyed grass	Xyris torta

Threatened plants:

Northern wild monkshood	Aconitum noveboracense
Round-stemmed false foxglove	Agalinus gattingerii
Nodding wild onion	Allium cernuum
Fragrant false indigo	Amorpha nana
Virginia snakeroot	Aristolochia serpentaria
Woolly milkweed	Asclepias lanuginosa
Showy milkweed	Asclepias speciosa
Forked aster	Aster furcatus
Rush aster	Aster junciformis
Flax-leaved aster	Aster linariifolius
Water parsnip	Berula erecta
Kittentails	Besseya bullii
Bog birch	Betula pumila
Pagoda plant	Blephilia ciliata
Leathery grapefern	Botrychium multifidum
Little grapefern	Botrychium simplex
Sweet Indian-plantain	Cacalia suaveolens
Poppy mallow	Callirhoe alcaeoides
Pipsissewa	Chimaphila umbellata
Golden saxifrage	Chrysosplenium iowense
Dayflower	Commelina erecta
Spotted coralroot	Corallorhiza maculata
Bunchberry	Cornus canadensis
Golden corydalis	Corydalis aurea
Pink corydalis	Corydalis sempervirens
Showy lady's-slipper	Cypripedium reginae
Slim-leaved panic-grass	Dichanthelium linearifolium
Jeweled shooting star	Dodecatheon amethystinum
Glandular wood fern	Dryopteris intermedia
Marginal shield fern	Dryopteris marginalis
Woodland horsetail	Equisetum sylvaticum
Slender cottongrass	Eriophorum gracile
Yellow trout lily	Erythronium americanum
Queen of the prairie	Filipendula rubra
Blue ash	Fraxinus quadrangulata
Black huckleberry	Gaylussacia baccata
Oak fern	Gymnocarpium dryopteris
Green violet	Hybanthus concolor
Twinleaf	Jeffersonia diphylla

Creeping juniper	Juniperus horizontalis
Intermediate pinweed	Lechea intermedia
Hairy pinweed	Lechea villosa
Prairie bush clover	Lespedeza leptostachya
Twinflower	Linnaea borealis
Western parsley	Lomatium orientale
Wild lupine	Lupinus perennis
Tree clubmoss	Lycopodium dendroideum
Rock clubmoss	Lycopodium porophilum
Hairy waterclover	Marsilea vestita
Bog buckbean	Menyanthes trifoliata
Winged monkeyflower	Mimulus alatus
Yellow monkeyflower	Mimulus glabratus
Partridge berry	Mitchella repens
Pinesap	Monotropa hypopithys
Small sundrops	Oenothera perennis
Little pricklypear	Opuntia fragilis
Royal fern	Osmunda regalis
Philadelphia panic-grass	Panicum philadelphicum
Slender beardtongue	Penstemon gracilis
Hooker's orchid	Platanthera hookeri
Northern bog orchid	Platanthera hyperborea
Western prairie fringed orchid	Platanthera praeclara
Purple fringed orchid	Platanthera psycodes
Pink milkwort	Polygala incarnata
Silverweed	Potentilla anserina
Shrubby cinquefoil	Potentilla fruticosa
Pennsylvania cinquefoil	Potentilla pensylvanica
One-sided shinleaf	Pyrola secunda
Meadow beauty	Rhexia virginica
Beaked rush	Rhynchospora capillacea
Northern currant	Ribes hudsonianum
Shining willow	Salix lucida
Bog willow	Salix pedicellaris
Low nutrush	Scleria verticillata
Buffaloberry	Sheperdia argentea
Scarlet globemallow	Sphaeralcea coccinea
Slender ladies-tresses	Spiranthes lacera
Oval ladies-tresses	Spiranthes ovalis
Hooded ladies-tresses	Spiranthes romanzoffiana
Spring ladies-tresses	Spiranthes vernalis
Rosy twisted-stalk	Streptopus roseus
Fameflower	Talinum parviflorum
Large arrowgrass	Triglochin maritimum
Small arrowgrass	Triglochin palustre
Low sweet blueberry	Vaccinium angustifolium
Velvetleaf blueberry	Vaccinium myrtilloides
False hellebore	Veratrum woodii
Kidney-leaved violet	Viola renifolia
Oregon woodsia	Woodsia oregana