

**DECISION  
AND  
FINDING OF NO SIGNIFICANT IMPACT  
REDUCING PIGEON, STARLING, AND SPARROW DAMAGE THROUGH AN  
INTEGRATED WILDLIFE DAMAGE MANAGEMENT PROGRAM IN THE  
COMMONWEALTH OF VIRGINIA**

**SUMMARY:** The Animal and Plant Health Inspection Service, Wildlife Services (hereinafter WS) has completed a pre-decisional Environmental Assessment (EA) (May 2000) that analyzed potential impacts of a proposed program and alternatives to respond to requests to reduce damage caused by pigeons, European starlings, and house sparrows. The damage and/or conflicts affect public and private property, human health and safety, agriculture, and natural resources in the Commonwealth of Virginia. This damage occurs primarily in urban areas. WS works cooperatively with Federal, State, and Local governments, public and private organizations and individuals to reduce damage and conflicts. Based on a review of the pre-decisional EA which was adopted as the Final EA, the Eastern Regional Director of Wildlife Services has decided to select the Proposed Action alternative, as described in the EA, and to issue a Finding of No Significant Impact (FONSI). The EA is tiered to the national Wildlife Services program's Animal Damage Control Final Environmental Impact Statement (USDA 1997).

**DATES:** The proposed action is continuation of the current program.

**ADDRESS:** The Final EA and supporting documentation are available for review by contacting Martin Lowney, State Director, Virginia Wildlife Services program at (804) 739-7739 or by writing to P.O. Box 130, Moseley, Virginia 23120.

**I. BACKGROUND**

**Need for Action**

Pigeons, European starlings, and house sparrows are non-indigenous bird species introduced to the United States from Europe over 100 years ago. These bird species rapidly colonized available habitat in North America and increased in abundance to over tens of millions of these birds. These birds readily live near humans and benefit from human activity. These species are not protected by federal law because they are an introduced species. Conflicts between pigeons, starlings, and house sparrows are common in Virginia and WS received numerous requests for assistance to reduce damage or conflicts. These bird species usually damage property, specifically manmade structures such as buildings, bridges, and barns, by defacing with excessive amounts of fecal droppings. This can result in a reduction in the aesthetic value of buildings, loss of use of areas such as parks, and structural degradation due to the corrosive nature of acidic fecal droppings from birds. There may be offensive ammonia-like odors associated with roosts of these birds caused by excessive accumulations of fecal droppings. There usually are increased maintenance costs to clean buildings, cars, ships, warehouses, aircraft, and property stored within

buildings because of deposition of fecal droppings. Pigeons, starlings, and house sparrows transmit over 40 diseases to humans and domestic animals. Two diseases, ornithosis and histoplasmosis are of greatest concern to health officials. Pigeons can also be carriers of E. coli bacteria and have contaminated public drinking water supplies. Pigeons can be a threat to aviation safety. Starlings because of their flocking behavior present a safety threat to aviation and represent 13% of all birds involved in bird-aircraft strikes. Jets have crashed and people have been killed in other states when their aircraft ingested starlings into the engines. Pigeons, starlings, and house sparrows consume and contaminate grain intended for human and livestock at grain handling facilities. Starlings have transmitted diseases from one livestock production facility to another. Starlings and sparrows can have a severe impact on some agricultural commodities in Virginia such as vineyards, apples, blueberries, sprouting grain, other fruits and vegetables, dairies, and cattle feedlots. Large winter roosts of starlings can create high ammonia content in soil which may pollute ground water and kill vegetation. Starlings and house sparrows also compete with native cavity-nesting birds for available nest sites.

## History

The WS program works with Virginia Department of Agriculture and Consumer Services and the U.S. Department of Interior, Fish and Wildlife Service to manage damage and conflicts involving pigeons, starlings, and house sparrows. Pigeon, starling, and house sparrow damage was occurring in Virginia and was being inadequately addressed by the private sector and local government due to a lack of information, inexperience, lack of available control methods, restrictions local government places on some control methods, and little knowledge and experience at implementing damage management programs to reduce damage. There recently has been a high profile case involving a Wythe County farmer misusing a pesticide (famphur) to kill house sparrows that were a nuisance. This pesticide misuse resulted in over 800 protected migratory birds of several species being killed. WS has taken a more active role in pigeon, starling, and house sparrow damage management because of unmet need. WS rewrote an earlier version of this EA to add a species (house sparrow) and new information and issues, and to re-analyze the impacts of the alternatives.

WS wrote an EA on managing pigeon and starling damage in 1996 and solicited public comment. WS sent letters to 76 state and federal agencies, organizations, businesses, and individuals soliciting comments on the proposed action in 1996. Notices were placed in two regional newspapers in June and July 1996, providing for a 30-day comment period. No comments were received from the public.

In May 2000, WS released a pre-decisional EA on managing pigeon, starling, and house sparrow damage and solicited comments from the public. WS sent 299 letters to local, state and federal agencies, organizations, businesses, and individuals soliciting comments on the proposed action. Additionally, notices were placed in four regional newspapers, providing for a 30-day comment period which was then extended an additional 9 days. Two comment letters were received. A FONSI was written in July 2000.

A comment letter was from a private organization and one summary letter with comments from 8 state agencies were received. These comments are in a separate Response to Comments document (Appendix 1).

## II. DECISION AND RATIONALE

After carefully reviewing the EA and the Response to Comments from comments received during the 39-day comment period, I believe that the need for action and issues identified in the pre-decisional EA are best addressed by implementing the Proposed Action alternative (Integrated Wildlife Damage Management Program (IWDM)). The pre-decisional EA analyzed five alternatives to address pigeon, starling, and house sparrow damage management in Virginia: a No Action alternative; a Lethal Program Only alternative; Continue the Current Program alternative (Proposed Action); a Technical Assistance Only alternative; and a Non-lethal Only Program alternative. Issues used to drive the analysis were identified during the pre-decisional EA process. These included effect on wildlife species, effects on public health and safety, and impacts to stakeholders, including aesthetics. Additional issues that were not considered in detail with rationale were: effects on pigeon, starling, and house sparrow populations; humaneness of methods used; no wildlife damage management at taxpayer expense; pigeon, starling, and house sparrow damage should be managed by private agents; relocation of wildlife should be used, and appropriateness of preparing an EA. No additional concerns or issues were brought forth by the public so WS will adopt the pre-decisional EA as the Final EA.

Wildlife Services activities will incorporate the actions identified in the Proposed Action alternative. The alternative allows Wildlife Services to provide both technical assistance and direct control services including both nonlethal and lethal management approaches. This will allow the use of practical and effective methods of preventing or controlling damage while minimizing harmful effects of control measures on humans, other species and the environment. Nonlethal methods will be given first consideration in the formulation of each damage management strategy, and will be recommended or implemented when practical and effective before recommending or implementing lethal methods. However, lethal methods may be implemented first in some situations to reduce chronic or severe economic damage or threats to human health and safety. No special permits are required to take pigeons, starlings, or house sparrows because they are non-indigenous species.

Memoranda of Understanding signed between WS and Virginia Department of Game and Inland Fisheries (VDGIF), Virginia Department of Agriculture and Consumer Services (VDACS), and Virginia Cooperative Extension Service outline responsibilities and sets forth objectives and goals of each agency for resolving wildlife damage management conflicts in Virginia.

### Environmental Consequences:

Continuation of the current program (the Proposed Action) will not significantly affect other wildlife species, including threatened and endangered species. Most likely, native wildlife species would benefit from the proposed action by reducing competition for food, shelter, and nest sites from pigeons, starlings, and house sparrows in local areas. The use of mitigation measures and

standard operating procedures ensures minimal impact on native wildlife. WS consulted with the Fish and Wildlife Service to ensure no affects on threatened and endangered species. The statewide impact on pigeons, starlings, and house sparrow populations would be insignificant. These species frequently depend on man to enhance their survival and reproductive potential because these birds readily live in close proximity with man and exploit non-traditional food resources (e.g., trash, waste grain, garbage at landfills) and non-traditional nest and roost sites (e.g., abandoned buildings, holes in buildings, dense evergreen ornamental shrubs around buildings, pine plantations).

The proposed action would be beneficial to public health and safety by reducing the amount of fecal droppings which may contain pathogens that people are exposed too. The benefits would be site specific and insignificant. The proposed action would benefit aviation by reducing the number of pigeons and starlings in the aircraft operating area at airports.

The proposed action would not significantly affect aesthetics. People's opinion on aesthetics differ depending upon their point of view and values. Most people would see an improvement to aesthetics if the number of birds were reduced with lethal or non-lethal methods because damage (e.g., fecal droppings) would be reduced. A few people would be upset at the reduction in pigeon, starling, or house sparrow numbers because they like to view or feed these birds. All these bird species are readily visible in all urban environments across Virginia. They are even common in most rural areas of the state and can be seen around bridges and feeding along interstate highways and state highways. While a reduction in pigeon, starling, or house sparrow numbers at a particular site may limit viewing, these birds can be viewed elsewhere. Also, resource owners who own or manage the damaged property must give WS permission to implement the proposed action on their property.

A legal notice is being published in four regional newspapers announcing the availability of this Decision and FONSI. In addition, copies of this Decision and FONSI and the EA are being sent to all parties who commented during any phase of the EA development.

### III. COMPLIANCE AND MONITORING

Wildlife Services will continue to formulate a joint strategy for program monitoring, data collection and analysis with VDACS and VDGIF and FWS. The WS program activities will be monitored via periodic coordination with those cooperating agencies.

Normally, according to the APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 C.F.R. 372.5(c), 60 Fed. Reg. 6000, 6003 (1995)). In order to facilitate agency planning and public involvement, streamline program management, and to clearly communicate with the public the analysis of cumulative impacts, we have decided to prepare an EA. The EA, this decision and FONSI will be reviewed annually or as needed to ensure conformance with all state and federal agency management plans or other guidelines, current environmental regulations and WS policies. Substantial changes in the scope of this project, or changes in the guidance documents and

environmental regulations could trigger the need for further analysis.

## FINDING OF NO SIGNIFICANT IMPACT

A careful review of the data and analysis in the Virginia Wildlife Services program EA, it indicates that there will not be a significant impact on the quality of the human environment as a result of this proposal. Having reviewed the Response to Comments indicates there will not be a significant impact on the quality of the human environment. I agree with this conclusion, and therefore, determine that an Environmental Impact Statement (EIS) will not be prepared. This determination is based on consideration of the following factors which are addressed in the EA:

1. The proposed activities will occur in isolated or localized areas only where a request for assistance is directed to Wildlife Services. The proposed activities are not national or regional in scope.
2. On balance, the impact of the program will be beneficial. Because of the limited intensity of the program, however, the benefits will not be significant.
3. The proposed activities will not significantly affect public health and safety. Any impacts to public health and safety will be beneficial, although not significantly beneficial. The proposed program will likely have a beneficial impact on human health and safety through a reduction in disease transmission to humans and the likelihood of bird aircraft strikes. The methods used to control pigeons, starlings, and house sparrows are highly target specific and are not likely to affect public health and safety.
4. The proposed activities will not have an impact on unique characteristics of the geographic area such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas. The methods proposed for alleviating damages will not be likely to impact these resources.
5. The effects on the quality of the human environment of the proposed activities are not highly controversial. Although some people are opposed to pigeon, starling, and house sparrow damage management, the methods and impacts are not controversial among experts.
6. The possible effects of the proposed activities on the quality of the human environment are not highly uncertain and do not involve unique or unknown risks.
7. The proposed activities do not establish a precedent for actions with future significant effects or represent a decision in principle about a future consideration. Other states are conducting similar pigeon, starling, and house sparrow damage management programs and have been doing so for years. These pigeon, starling, and house sparrow damage management programs in other states are unique to

each state because of different program objectives and means of reaching those objectives; and because of different state, federal, or local government involvement managing pigeon, starling, and house sparrow damage in those respective states.

- 8. There are no significant cumulative effects identified by this assessment. These bird species are not protected by federal or state law because they are invasive non-indigenous species. As discussed in the EA, this would be expected to slow the local population growth rate or reduce the local population temporarily but not reduce the population statewide.

There are no national cumulative impacts to pigeons, starlings, and house sparrows populations because these birds are non-indigenous to North America. This program is directed primarily at pigeons, starlings, and house sparrows in Virginia. This program has no national cumulative impacts to pigeons, starlings, and house sparrows.

- 9. The proposed activities will not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places nor will it cause a loss or destruction of significant scientific, cultural, or historical resources.
- 10. The proposed activities will fully comply with the Endangered Species Act of 1973, as amended. The WS program, in coordination with FWS, VDACS, and VDGIF determined that the proposed activities would not affect Federally or State listed threatened and endangered species.
- 11. The proposed activities will not threaten a violation of Federal, State, or local law or requirements imposed for the protection of the environment. The proposed activity does not violate the Migratory Bird Treaty Act.

For additional information concerning this decision, please contact Martin Lowney APHIS Wildlife Services, P.O. Box 130, Moseley, VA 23120, (804) 739-7739.

Approved by :

/s/  
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Gary Larson  
Eastern Region Director  
Wildlife Services

8/18/00  
\_\_\_\_\_  
Date

**APPENDIX 1**

**RESPONSE TO COMMENTS**

**Summary of Substantive Public Comments and Responses**

**to the**

**Pre-decisional Environmental Assessment on reducing pigeon, starling, and sparrow  
damage through an Integrated Wildlife Damage Management Program  
in the Commonwealth of Virginia**

A total of 2 comment letters from eight state agencies (one letter) and an organization were received on the pre-decisional environmental assessment (EA) on reducing pigeon, starling, and sparrow damage through an Integrated Wildlife Damage Management Program in the Commonwealth of Virginia completed in May 2000. These comments were received during one 39-day comment period in June and July 2000. Comments were received in the form of letters.

Public involvement under provisions of the National Environmental Policy Act is intended to gather substantive information and ideas from the public on proposed federal actions in order to help managers make better decisions. The public involvement process is not counting votes supporting or opposing management actions. While quantitative information is gathered and is important in assessing attitudes, that is only part of the information analyzed.

All responses were reviewed for major issues. Comments addressed a few topics, and points of concern are summarized as “*Issues*”. These issues and the program’s response to each are discussed below.

*Issue 1:* A comment was received expressing concern non-target native birds may be affected by use of registered toxicants if they ate treated bait.

*Program response:* The EA addressed this issue in Section 3.3.3 and in Appendix B. WS will provide additional information about pre-baiting and monitoring bait sites to minimize impact on native birds. Bait sites are selected based on knowledge of bird behavior and life requisites. Several sites are then baited with untreated bait, usually for 2 - 3 weeks. During this time bird species abundance, and consumption of bait at bait sites is monitored. The resource owner who WS is assisting is also asked to monitor the bait site for bird use and to report if non-target birds feed at the bait site. Bait sites being routinely used by native birds species or that are poorly used by target bird species are dropped in favor of other bait sites.

Bait sites used by pigeons, starlings, and sparrows usually are on roof tops, inside buildings or manufacturing facilities, under bridges, inside or on ships, or inside barns. Few native bird species will use these bait sites. When bait sites are located on the ground at the periphery of manufacturing facilities, mourning doves may use these sites. Bait sites on the ground placed away from dense shrubs or wood lots deters cardinals and other native bird species. The type bait placed also can be a deterrent to bait site use by native bird species.

*Issue 2:* A comment was received wanting nonlethal methods used before lethal methods.

*Program response:* WS has a complex decision model which is shown in Section 3.2.3 of the EA. Many factors and pieces of information are analyzed by wildlife biologists and wildlife specialists in selecting the most appropriate methods to alleviate damage for a resource owner. Integrated Wildlife Damage Management is about using any and all practical and effective methods, sequentially or simultaneously to resolve wildlife damage. Sometimes nonlethal methods are used first, if these methods will reduce damage. Common nonlethal methods used for pigeons, sparrows, and less frequently starlings, is exclusion from buildings, cleaning up spilled grain or

other foods, and asking patrons to stop feeding the birds. Problems associated with starling winter roosts frequently are addressed by habitat alteration (thinning cedar thickets or pine stands by removing 50 - 75% of the stems), or dispersal by harassment with pyrotechnics, distress calls, and propane cannons used simultaneously.

However, there are specific times and problems when damage is chronic or severe or a threat to human health or safety and reducing the local population of pigeons, starlings, or sparrows is warranted. An important consideration when implementing lethal control is will the implementation of nonlethal methods result in moving the problem to another resource owner. If the dispersal or exclusion of the birds is likely in WS professional opinion to result in moving the problem to another resource owner then WS likely will recommend implementation of lethal methods.

*Issue 3:* There was concern that WS would be competing with the private sector by conducting pigeon, starling, or house sparrow damage management.

*Program response:* The WS program has a long history of working with and in cooperation with the private sector. Sometimes WS works cooperatively with the private sector simultaneously on the same property to solve a problem. Other times WS provides information, training, and supplies so the private sector can solve the problem for the resource owner. And sometimes the private sector refers the resource owner to WS to have the problem solved. WS has a national policy on competition with the private sector which essentially prohibits WS from participating in a bid for an advertised request. Within the Virginia WS program, resource owners requesting assistance are giving three choices for solving damage: 1) they can get technical assistance and solve the problem themselves, 2) they can hire the private sector, or 3) they can receive technical assistance and contract with WS for direct control.