

**Addendum to the  
Finding of No Significant Impact  
Asian Longhorned Beetle Cooperative Eradication Program in  
Worcester and Middlesex Counties, Massachusetts  
Environmental Assessment  
September 2008**

This addendum to the finding of no significant impact (FONSI) was prepared to clarify a situation that was unclear in the original environmental assessment (EA) and FONSI. While the analysis that was done in the EA applies to the situation, it was not specifically stated, therefore, this addendum was prepared to avoid confusion.

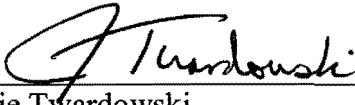
The subject EA was prepared in September, 2008. Public comment was subsequently sought. No public comments were received on the EA; however, at a previous public meeting (prior to the release of the EA) that was held to discuss the Asian longhorned beetle (ALB), questions were raised by beekeepers regarding the program. That meeting resulted in a continuing dialog between bee keepers and the U.S. Department of Agriculture--Animal and Plant Health Inspection Service (APHIS). The source of ongoing concern for the bee keepers is the potential impact of program chemicals on bees, particularly the use of imidacloprid soil and tree trunk injections. The EA states that "imidacloprid treatments are typically made in early spring." The EA then analyzed the use of imidacloprid and determined that environmental impacts, including potential impacts to bees, would be negligible. Based on the analysis in the EA, a FONSI was prepared and subsequently signed on November 21, 2008. A copy of the EA with the FONSI attached can be found at [http://www.aphis.usda.gov/plant\\_health/ea/alb.shtml](http://www.aphis.usda.gov/plant_health/ea/alb.shtml).

Practical matters associated with the unexpectedly large size of the ALB infestation in Worcester County have resulted in the realization that the time required for soil and tree injections, coupled with the larger than anticipated number of trees that may require treatment within the infested area, would result in delays in eradicating ALB. The ALB program could reduce any delay in achieving eradication if the amount of time available for treatment could be expanded to include fall soil and tree injections. Efficacy data related to fall treatments is lacking; therefore, APHIS is proposing to collect information regarding these types of treatments. The fall treatments with imidacloprid are identical to the spring treatments that are already being conducted, and would include treatment of approximately 100 trees (Norway maples, red maples, sugar maples, and birch trees). Half of the trees would receive soil injections and half would receive trunk injections. Each of the trees would be located within the current eradication area, and would not expand the treatment area or number of trees that could be treated under the current eradication program. The only difference from the current program would be the fall, rather than spring, treatment of approximately 100 trees. Should the efficacy studies determine that the treatments are effective, fall imidacloprid treatments could be incorporated into the eradication program.

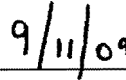
Bee keepers and others remain concerned about the use of imidacloprid in the program due to its known toxicity to bees and allegations that imidacloprid is linked to bee declines in the field. APHIS is sensitive to these concerns and wants to ensure that its use of imidacloprid does not result in harm to pollinators, including bees or bee colonies. Therefore, in addition to efficacy data, the proposed new efforts will include the collection of residue data from plant parts (such

as flowers, nectar, and pollen) that will help us to better understand the potential for impact to pollinators and bees. Based on available information, APHIS is confident that the evaluation provided in the EA remains accurate and that the use of imidacloprid in spring ALB eradication treatments is likely to result in minimal, if any, impact to bee populations. Likewise, APHIS also believes that the proposed fall applications of imidacloprid, in accordance with standard eradication treatment practices, is unlikely to result in negative impacts to populations of bees or result in any other significant impact to the environment. The number of trees to be treated is very small in relation to the number of trees in the eradication area, and it is unlikely that large numbers of bees will gather pollen and nectar only from the treated trees. This is based on the presence of flower sources other than treated trees and the method of application, both of which minimize exposure of bees to imidacloprid. If the results of the studies confirm its efficacy, as well as our conclusions about fall applications of imidacloprid and probable lack of negative impacts to bee populations, then APHIS would likely add fall applications of imidacloprid to the ALB eradication program.

I have determined that this clarification (that the eradication project may include fall imidacloprid treatments as well as spring treatments) of the extent of the original FONSI (signed on November 21, 2008) is appropriate and that fall soil and trunk injection treatments of imidacloprid would not result in significant impact on the quality of the human environment.



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