

**Amended Finding of No Significant Impact (FONSI)  
for  
Giant African Snail Cooperative Eradication  
Program Environmental Assessment  
of November 2011**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), prepared an environmental assessment (EA) in October 2011 that analyzed alternatives for eradicating the Giant African Snail (GAS) *Lissachatina (Achatina) fulica* in Miami-Dade County, Florida. The EA, which analyzed the potential impacts of the program, is incorporated by reference in this document, and is available from:

U.S. Department of Agriculture  
Animal and Plant Health Inspection Service  
Plant Protection and Quarantine  
Emergency and Domestic Programs  
4700 River Road, Unit 26  
Riverdale, MD 20737

[http://www.aphis.usda.gov/plant\\_health/plant\\_pest\\_info/gas/index.shtml](http://www.aphis.usda.gov/plant_health/plant_pest_info/gas/index.shtml)

The EA analyzed alternatives consisting of (1) no APHIS action other than to continue to prohibit the importation and interstate movement of the GAS, and confiscate it where discovered, and (2) the preferred alternative, where APHIS would work cooperatively with the Florida Department of Agriculture and Consumer Services (FDACS) to eradicate this exotic snail from Miami-Dade County, Florida. The EA analyzed the impacts of the use of a molluscicide, iron phosphate, which in conjunction with physical removal, is the most effective method of eradication for this exotic snail.

Due to the serious threat of GAS, a Finding of No Significant Impact (FONSI) was issued before the 30-day comment period on the EA concluded and treatment began immediately in the nine cores identified in Appendix B of the EA. In the initial FONSI, APHIS stated that after the 30-day comment period concluded, all comments received would be carefully reviewed and, if necessary, any changes or modifications to the EA and/or the FONSI would be announced in the same manner as the legal notices for the availability of the EA. Based on the comments that were received, and the current program, this amended FONSI was determined to be the appropriate notification for comments that have been received and any updates in program activities. All comments received by the closing date of November 11, 2011, were carefully reviewed and considered by APHIS.

APHIS received six comments during the 30-day comment period for this EA. Two were from private companies regarding possible alternate control measures for the GAS. One of these was from the registrant of the proposed molluscicide regarding other formulations of iron phosphate that could be used in the program. The second was a proposal to use bait stations to trap the GAS, a control method which APHIS is currently evaluating. Other comments were in the form of a letter of support from the Florida Farm Bureau Federation, the Florida Fruit and Vegetable Association and the Florida Department of Agriculture and Consumer Services (FDACS). A sixth comment was received from a private citizen with questions regarding the program. In general these questions were focused on clarifying the implementation of the program and the molluscicide proposed for

use. Molluscicide treatments are not intended to be broadcast over large areas of Miami-Dade County but only in 200-yard arcs in areas where the GAS has been identified. Treatments are made to properties once the landowner signs a waiver. In addition, there has been extensive outreach to the community with strong support to remove this invasive species. The combination of physical removal with directed molluscicide treatments as described in the EA, as part of a cooperative effort between APHIS and FDACS, has been found to be the preferred alternative to eradicating the GAS. The formulation of molluscicide chosen for this program is certified organic by the Organic Materials Review Institute and the Food and Drug Administration has determined that the other ingredients in the formulation are generally recognized as safe (GRAS), while the Environmental Protection Agency has determined that the other ingredients are in their lowest category of toxicity.

Changes in the program since the publication of the EA and initial FONSI in October are related to the expansion of core areas beyond the original nine. Four additional core areas were identified during the comment period. All new core areas are within Miami-Dade County which is within the scope of analysis for the EA that was prepared in October for public comment.

As these new areas have been identified, APHIS, in consultation with the U.S. Fish and Wildlife Service, has reviewed the new treatment areas and determined that program actions are not likely to adversely affect federally listed species and their designated critical habitat. If the treatment area expands, or new listed species or critical habitats are listed, APHIS will reevaluate program activities and consult with the U.S. Fish and Wildlife Service, as necessary. A 10-foot application buffer will be applied to all water bodies to reduce exposure in aquatic habitats. Significant impacts to human health or the environment are not anticipated based on an evaluation of available information regarding the proposed use of the molluscicide in this program, the expansion of treatment cores, and comments received during the 30-day comment period for the EA.

There are no disproportionate adverse effects to minorities, low-income populations, or children, in accordance with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations," and Executive Order 13045, "Protection of Children from Environmental Health Risks and Safety Risks." Pursuant to Section 106 of the National Historic Preservation Act there are no expected adverse impacts to cultural or historical properties.

I find that implementation of the proposed program will not significantly impact the quality of the human environment. I have considered and based my finding of no significant impact on the analysis contained within the EA and my review of the program's operational characteristics. Lastly, because I have not found evidence of significant environmental impact associated with the proposed program, I find that no additional environmental documentation needs to be prepared and that the program may proceed.



Jeffrey Grode  
Emergency and Domestic Programs  
Plant Protection and Quarantine  
Animal and Plant Health Inspection Service

11/14/11

Date