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Agriculture

Animal and Plant  
Health Inspection  
Service

Wildlife Services

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**Decision  
And  
Finding of No Significant Impact  
For  
Bird Damage Management in the Idaho Wildlife Services Program**

The United States Department of Agriculture, Animal and Plant Health Inspection Service (USDA, APHIS), Wildlife Services (WS) program responds to a variety of requests for assistance from individuals, organizations, and agencies experiencing damage and other related problems from birds. Ordinarily, individual bird damage management (BDM) actions are categorically excluded and do not require an environmental assessment (EA) (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). However, to evaluate and determine if there might be any potentially significant impacts to the human environment from WS' proposed BDM, an EA was prepared. The pre-decisional EA released by WS in September 1998 documented the need for BDM in Idaho and assessed potential impacts of various alternatives in responding to bird damage and other related problems. WS' proposed action was to continue the Federal BDM program and use currently authorized methods.

#### **Public Involvement**

A public involvement process was not conducted prior to preparing the EA. However, the U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, and the Idaho Department of Agriculture were consulted and a list of issues and concerns were developed. Those issues and concerns are discussed in the EA.

An EA was prepared and released to the public on September 3, 1998 for a 30-day comment period. The Notice of Availability regarding the comment period was published in the legal notice section of The Post Register, Idaho Falls; The Idaho Statesman, Boise, Lewiston Morning Tribune, Lewiston; Coeur d'Alene Press, Coeur d'Alene; Time-News, Twin Falls; and The Idaho State Journal, Pocatello. The Notice of Availability expressed that WS was accepting public comments on the EA and that copies were available from the State WS office in Boise. In addition, copies of the EA were mailed to 29 different natural resources and agricultural organizations, wildlife and bird conservation organizations, and Federal and State government agencies having interest in BDM issues. Five comment letters were received in response to the public comment period and all letters supported the Proposed Action alternative. No other comments or issues from the public or governmental agencies were received by WS.

#### **Major Issues**

Cooperating agencies helped identify a variety of issues relevant to the scope of this EA. These issues were grouped into the following 5 primary issues to be considered in detail:

1. Cumulative effects of WS BDM on target bird species populations.
2. Effects of WS BDM on non-target species populations, including threatened and endangered (T&E) species.
3. Risks posed by WS BDM methods to the public and domestic pets.

4. Efficacy and selectivity of BDM methods.
5. Cost-effectiveness of BDM methods.

### **Alternatives Analyzed in Detail**

Four alternatives were developed and analyzed in relation to the issues identified above. Three additional alternatives were considered but not analyzed in detail. A detailed discussion of the anticipated effects of the alternatives on the issues is described in Chapter 4 of the EA. The following summary provides a brief description of each alternative and its anticipated impacts.

**A. Alternative 1. Continue the Current Federal BDM Program (No Action/Proposed Action).** The No Action alternative is a procedural requirement (40 CFR 1502) of the National Environmental Policy Act and is a viable and reasonable alternative that could be selected. It also serves as a baseline for comparison with the other alternatives. The No Action/Proposed Action is to continue the current Idaho WS BDM program for the protection of agricultural and natural resources, aquaculture, property, and public health and safety. WS would respond to all requests for assistance with, at a minimum, technical assistance, or, where appropriate and when cooperative funding is available, direct operational assistance, whereby WS personnel conduct damage management actions. An integrated wildlife damage management approach would be implemented allowing for use of all lethal methods, either singly or in combination, to meet the requester needs for reducing or stopping damage or other related problems. Alternative 1 results in only low levels of impact on bird populations, presents very low risks to the public, T&E species, non-target species, and is cost-effective. Methods used are selective and effective.

**B. Alternative 2. Non-lethal Damage Management Required Before Lethal.** This alternative would not allow for the use of lethal methods by WS until non-lethal methods have been used in a given damage situation and found to be ineffective or inadequate. No preventive lethal damage management would be allowed. Alternative 2 may result in the removal of fewer target individuals than in Alternative 1, however, risks of illegal toxicant use by non-WS entities would probably be higher than the Proposed Action. Risks from WS methods implementation to the public and domestic pets would probably be the same as Alternative 1 once the non-lethal before lethal requirement is met, however risks of illegal toxicant use would probably be higher than the Proposed Action. Selectivity of methods used would be similar to Alternative 1. Costs to conduct BDM would probably increase because of the additional time WS would have to invest to conduct, supervise, and/or monitor non-lethal damage management methods and results.

**C. Alternative 3. Technical Assistance Only.** This alternative would not allow for WS direct operational BDM in Idaho. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, or others could conduct BDM using legally available lethal or non-lethal methods. DRC-1339 and alpha-chloralose would not be available for use by the public or government agencies. Bird damage would likely increase, particularly starling damage at feedlots, without the option of using DRC-1339. Producer's inability to legally and effectively reduce bird damage could lead some producers to use toxicants which are not currently registered for BDM or as selective as DRC-1339. This could result in increased impacts on non-target and T&E species. Costs to WS would probably be lower than the Proposed Action because the number of WS personnel needed to conduct BDM would be reduced to only those needed to provide technical assistance.

**D. Alternative 4. No Federal WS BDM.** This alternative would eliminate WS' involvement in BDM in Idaho. WS would not provide direct operational or technical assistance and requesters of WS' services would have to conduct their own BDM without WS input or recommendation. Information on BDM methods development would still be available to producers and property owners. DRC-1339 and alpha-chloralose would not be available for use by the public or government agencies. Bird damage would likely increase, particularly starling damage at feedlots, without the option of using DRC-1339. WS would not have any impact on target, non-target, and T&E species populations. It is possible that frustration from the public caused by the inability to effectively reduce bird losses would lead to illegal use of toxicants, increasing risks to non-target wildlife and pets, and decreasing selectivity for target birds.

### **Decision and Rationale, and Finding of No Significant Impact**

The analysis in the EA indicates that there would not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of the Proposed Action. I agree with this conclusion and therefore find that an EIS is not needed. This determination is based on the following factors:

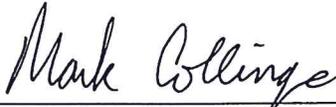
1. BDM, as conducted by WS in Idaho, is not regional or national in scope.
2. The Proposed Action would pose minimal risk to public health and safety. No injuries to any member of the public are known to have resulted from WS BDM activities in Idaho.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected.
4. The effects on the quality of the human environment are not highly controversial. Although there is some public opposition to the use of avicides, this action is not highly controversial in terms of size, nature, quantity applied, or effect.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the Proposed Action on the human environment would not be significant. The effects of the Proposed Action are not highly uncertain and do not involve unique or unknown risks.
6. The Proposed Action would not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through this assessment. The number of birds taken by WS annually or the anticipated number of birds taken would not adversely impact the breeding populations.
8. The Proposed Action would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant, cultural, or historical resources.
9. An informal Section 7 consultation with the U.S. Fish and Wildlife Service confirmed that the Proposed Action

would not likely adversely affect any T&E species. The Idaho Division of Environmental Quality also concurred that the Proposed Actions will likely have no effect to the environment.

10. The Proposed Action would be in compliance with all Federal, State, and local laws and regulations imposed for the protection of the environment.

I have carefully reviewed the EA and the input resulting from the public involvement process. I believe the issues identified in the EA would be best addressed through implementation of Alternative 1 - Continue the Current Federal BDM Program. Alternative 1 would provide the greatest effectiveness and selectivity of methods available, the best cost-effectiveness, and has a low level of risk to the public, pets, non-target and T&E species, and the environment. WS will continue to use all currently authorized BDM methods in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA. The decision to implement Alternative 1 will become effective upon publication of legal notice in the newspapers where the Notice of Availability was published September 3, 1998.

For additional information regarding this decision, please contact George E. Graves, APHIS, WS, 9134 Blackeagle Dr., Boise, ID 83709, e-mail: [george.e.graves@usda.gov](mailto:george.e.graves@usda.gov), or telephone (208) 378-5077.



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Mark Collinge, State Director  
Idaho APHIS, WS Program

12-16-98

Date