

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**SUPPLEMENT TO ENVIRONMENTAL ASSESSMENT: REDUCING MAMMAL DAMAGE
IN MISSOURI**

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program completed an Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) on alternatives for the protection of agricultural resources, natural resources, property, livestock, and public health and safety from damage and risks associated with mammals in Missouri in November 2006 (USDA 2006). The management alternative selected was, “*Alternative 2 - Integrated Mammal Damage Management Program (Proposed Action/No Action)*” in which WS uses and recommends practical and effective nonlethal and lethal methods to alleviate mammal damage to agricultural and natural resources, property, and human health and safety. WS has prepared a supplement to the EA in order to update information, review data on the program implemented since the completion of the EA, consider impacts of adding new methods for mammal damage management (MDM), and to provide the public the opportunity to review and comment on WS’ MDM activities (USDA 2013).

PUBLIC COMMENTS

The 2006 EA, 2006 Decision/FONSI, and the 2013 Supplement were made available for review and comment from April 18 to May 31, 2013. The documents were made available through a Notice of Availability (NOA) published in the *Jefferson City News Tribune* and mailings sent to 27 interested parties. WS also published these documents on the program website. No comments were received. All correspondence on the EA and Supplement are maintained at the WS office, 1714 Commerce Court, Suite C, Columbia, MO 65202-1594.

ISSUES ASSOCIATED WITH MAMMAL DAMAGE MANAGEMENT ACTIVITIES

The EA and supplement analyzed a range of management alternatives in context of issues relevant to the scope of the analysis including:

- Effects on target mammal 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 of methods used

AFFECTED ENVIRONMENT

Mammal damage or threats of damage can occur statewide in Missouri wherever those mammal species occur. However, mammal damage management would only be conducted by WS when requested by a landowner or manager and only on properties where a cooperative service agreement or other comparable document was signed between WS and a cooperating entity. Upon receiving a request for assistance, activities could be conducted on federal, State, tribal, municipal, and private properties. Areas where damage or threats of damage could occur include, but would not be limited to agricultural fields, vineyards, orchards, farms, aquaculture facilities, grain mills, grain handling areas, railroad yards, waste handling facilities, industrial sites, natural resource areas, park lands, and historic sites; state and interstate

highways and roads; property in or adjacent to subdivisions, businesses, and industrial parks; timberlands, croplands, and pastures; private and public property where burrowing mammals cause damage to structures, dikes, ditches, ponds, and levees; public and private properties in rural/urban/suburban areas where mammals cause damage to landscaping and natural resources, property, and are a threat to human safety through the spread of disease. The areas could also include airports and military airbases where mammals are a threat to human safety and to property; and areas where mammals negatively affect wildlife, including T&E species.

DESCRIPTION OF THE ALTERNATIVES

The following four alternatives were developed to respond to the issues identified in Chapter 2 of the EA (USDA 2006). A detailed discussion of the effects of the alternatives on the issues is described in the EA under Chapter 4; below is a summary of the alternatives.

Alternative 1: Technical Assistance Only

This alternative would not allow for WS operational MDM in Missouri. Wildlife Services would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, corporations, or others could conduct MDM using any legal lethal or non-lethal method available to them.

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

The No Action alternative is a procedural NEPA requirement (40 CFR 1502.14(d)) and is a viable and reasonable alternative that could be selected and serves as a baseline for comparison with the other alternatives. The No Action alternative, as defined here, is consistent with guidance from the CEQ (CEQ 1981). In this guidance, the No Action alternative for situations where there is an ongoing management program may be interpreted as "no change" from current management direction or level of management intensity.

Under this alternative, WS would continue the current damage management program that responds to mammal damage in Missouri. Wildlife Services' involvement in MDM in Missouri is closely coordinated with the Missouri Department of Conservation (MDC), and WS take of mammals is authorized through permits and/or other authorities granted by the MDC. An Integrated Wildlife Damage Management (IWDM) approach would be implemented to reduce mammal damage to property, agricultural resources, and natural resources, and to reduce mammal impacts on human/public health and safety. Damage management would be conducted on public and private property in Missouri when the resource owner (property owner) or manager requests assistance. The IWDM strategy would encompass the use and recommendation 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 non-lethal techniques like physical exclusion, habitat modification or harassment would be recommended and utilized to reduce damage. In other situations, mammals would be removed as humanely as possible using shooting, trapping, and registered pesticides and other products. Preference would be given to practical and effective non-lethal methods, but, 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.

WS is proposing to add new methods to the list of techniques which may be used for MDM in Missouri: surveillance from aircraft, aerial sharpshooting, and use of tracking dogs. All three methods are primarily intended for use in location and removal of feral swine, although aerial surveillance may be used in limited applications to address disease concerns in deer.

Alternative 3: Non-lethal Mammal Damage Management Only by WS

This alternative would restrict WS to using and recommending non-lethal methods to resolve mammal damage problems. Information on lethal MDM methods would still be available to producers and property owners through other sources such as the MDC, USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information regarding lethal management approaches would be referred to these entities. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, arrange for WS direct assistance with non-lethal MDM, 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.

Alternative 4: No Federal WS Mammal Damage Management

This alternative would eliminate WS involvement in MDM in Missouri. Wildlife Services would not provide direct operational or technical assistance and entities which would otherwise have requested WS' assistance would have to conduct their own MDM without WS input. Information on MDM methods would still be available to producers and property owners through other sources such as the MDC, USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information would be referred to these entities. Individuals might choose to conduct MDM themselves, use contractual services of private businesses, or take no action.

CONSISTENCY

Wildlife damage management activities conducted in Missouri are consistent with work plans, MOU's, and policies of WS, the MDC, and the US Fish and Wildlife Service (USFWS). In addition, WS completed an Informal Section 7 consultation with the USFWS regarding potential impacts of the statewide mammal damage management program on threatened and endangered species. Based on the provisions and protective measures established in the EA, WS concluded the proposed action would have no effect or not likely to adversely affect any federally-listed species. After reviewing the provisions and protective measures established in the supplement, WS again concluded the proposed alternative would have no effect on federally-listed species. WS also consulted with the MDC regarding potential risks to state-listed species proposed in the EA and supplement. In both instances, the MDC concurred with WS' determination that the proposed action would not adversely impact populations of state-listed species.

MONITORING

The Missouri WS program will annually review its effects on target mammal species and other species addressed in the EA and Supplement to ensure those activities do not impact the viability of wildlife species. In addition, the EA and Supplement will be reviewed each year to ensure that the analyses are sufficient.

CUMULATIVE IMPACTS OF THE PROPOSED ACTION

No significant cumulative environmental impacts were identified from any of the four alternatives, including the proposed action. Under the proposed action, the lethal removal of mammals by WS would

not have significant impacts on statewide mammal populations when known sources of mortality were considered. No risk to public safety was identified when activities were provided and expected by requesting individuals under Alternative 2 and Alternative 3 since only trained and experienced personnel would conduct and/or recommend damage management activities. There would be a slight increased risk to public safety when persons who reject assistance and recommendations conduct their own activities under Alternative 1 and when no assistance was provided under Alternative 4. However, under all of the alternatives, those risks would not be to the point that the effects would be significant. The analysis in the EA indicates that an integrated approach to managing damage and threats caused by mammals would not result in significant cumulative effects on the quality of the human environment.

DECISION AND FINDING OF NO SIGNIFICANT IMPACT

I have carefully reviewed the EA and supplement prepared for this proposal and the input from the public involvement process. I find the proposed action alternative (Alternative 2) to be environmentally acceptable, addressing the issues and needs while balancing the environmental concerns of management agencies, landowners, advocacy groups, and the public. The analyses in the EA and supplement adequately address the identified issues, which reasonably confirm that no significant impact, individually or cumulatively, to the quality of the human environment are likely to occur from the proposed action, nor does the proposed action constitute a major federal action. Therefore, the analysis in the EA does not warrant the completion of an EIS.

Based on the analyses in the EA, the need for action and the issues identified are best addressed by selecting Alternative 2 and applying the associated standard operating procedures. Alternative 2 successfully addresses (1) mammal damage management using a combination of the most effective methods and does not adversely impact the environment, property, human health and safety, target species, and/or non-target species, including T&E species; (2) it offers the greatest chance of maximizing effectiveness and benefits to resource owners and managers; (3) it presents the greatest chance of maximizing net benefits while minimizing adverse effects to public health and safety; and (4) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of those issues are considered. Further analysis would be triggered if changes occur that broaden the scope of damage management activities that affect the natural or human environment or from the issuance of new environmental regulations. Therefore, it is my decision to implement the proposed action/no action alternative (Alternative 2) as described in the EA and supplement.

Based on the analyses provided in the EA, there are no indications that the proposed action (Alternative 2) would have a significant impact, individually or cumulatively, on the quality of the human environment. I agree with this conclusion and therefore, find that an EIS should not be prepared. This determination is based on the following factors:

1. Mammal damage management, as conducted by WS in the State, is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety. Based on the analyses in the EA, the methods available would not adversely affect human safety based on their use patterns and standard operating procedures.
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. WS' standard operating procedures and adherence to applicable laws and regulations would further ensure that WS' activities do not harm the environment.

4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to mammal damage management, this action is not highly controversial in terms of size, nature, or effect.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed damage management program on the human environment would not be significant. The effects of the proposed activities 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 the assessment. The EA and Supplement analyzed cumulative effects on target and non-target species populations and concluded that such impacts were not significant for this or other anticipated actions to be implemented or planned within the State of Missouri.
8. The proposed activities 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 scientific, cultural, or historical resources.
9. WS has determined that the proposed program would not adversely affect any federally-listed T&E species currently listed in the State and the USFWS has concurred with WS' determination. In addition, WS has determined that the proposed activities would not adversely affect State-listed species.
10. The proposed action would comply with all applicable federal, State, and local laws.
11. No significant cumulative effects were identified by this assessment or other actions implemented or planned within the area.

The rationale for this decision is based on several considerations. This decision takes into account public comments, social/political and economic concerns, public health and safety, and the best available science. The foremost considerations are that: 1) mammal damage management would only be conducted by WS at the request of landowners/managers, 2) management actions would be consistent with applicable laws, regulations, policies and orders, and 3) no significant effects to the environment were identified in the analysis. As a part of this Decision, the WS program in Missouri would continue to provide effective and practical technical assistance and direct management techniques that reduce damage and threats of damage.



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6/17/13

Date

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