DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT

SUPPLEMENT TO THE ENVIRONMENTAL ASSESSMENT: REDUCING BIRD DAMAGE IN THE STATE OF CONNECTICUT

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 reducing bird damage in Connecticut (USDA 2013). The management alternative selected was, "*Alternative 1 – Continue the Current Integrated Approach to Managing Bird Damage (Proposed Action/No Action)*" in which WS uses and recommends practical and effective nonlethal and lethal methods to alleviate bird damage to agricultural and natural resources, property, and human health and safety. The program prepared a Supplement in 2015 to analyze additional bird species that may have potential environmental and social impacts to the quality of the human environment from resolving damage. The EA and Supplement document the need for bird damage management and assess potential impacts on the human environment of three alternatives to address that need. The proposed action alternative in the Supplement would continue an integrated damage management program to address the need to manage damage and threats associated with birds (USDA 2015).

PUBLIC COMMENTS

The Supplement was made available for review and comment from August 18 to September 27, 2015. The document was made available through a Notice of Availability (NOA) published in the *Hartford Courant* and the APHIS stakeholder registry. WS also published these documents on the program website. No comments were received. All correspondence on the EA and Supplement is maintained at the WS State Office, 463 West Street, Amherst, MA 01002.

ISSUES ASSOCIATED WITH BIRD DAMAGE MANAGEMENT ACTIVITIES

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

- Issue 1 - Effects of Damage Management Activities on Target Bird Populations
- Issue 2 - Effects on Non-target Wildlife Species Populations, Including T&E Species
- Issue 3 - Effects of Damage Management Methods on Human Health and Safety
- Issue 4 - Effects on the Aesthetic Values of Birds
- Issue 5 - Humaneness and Animal Welfare Concerns of Methods
- Issue 6 - Effects of Bird Damage Management Activities on the Regulated Harvest of Birds

AFFECTED ENVIRONMENT

Bird damage or threats of damage can be found statewide wherever those bird species occur. However, bird 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, industrial parks, timberlands, croplands, and pastures, private and public property, and locations where birds are a threat to human safety through the spread of disease. The areas could also include airports and military airbases where birds are a threat to human safety and to property.

DESCRIPTION OF THE ALTERNATIVES

The following three alternatives were developed to respond to the issues identified in Chapter 2 of the EA. A detailed discussion of the effects of the alternatives on the issues is described in the EA under Chapter 4 (USDA 2013); below is a summary of the alternatives.

Alternative 1 – Continuing the Current Integrated Approach to Managing Bird Damage (Proposed Action/No Action) (USDA 2013)

The proposed action/no action alternative would continue the current implementation of an adaptive integrated approach utilizing non-lethal and lethal techniques, as deemed appropriate using the WS Decision Model (Slate et al. 1992; WS Directive 2.201), to reduce damage and threats caused by birds. A major goal of the program would be to resolve and prevent bird damage and to reduce threats to human safety. To meet this goal, WS, in cooperation with the United States Fish and Wildlife Service (USFWS) and in consultation with the Connecticut Department of Energy and Environmental Protection (CT DEEP), would continue to respond to requests for assistance with, at a minimum, technical assistance, or when funding was available, operational damage management. Therefore, under this alternative, WS could respond to requests for assistance by: 1) taking no action if warranted, 2) providing only technical assistance to property owners or managers on actions they could take to reduce damages caused by birds, or 3) providing technical assistance and direct operational assistance to a property owner or manager experiencing damage. Funding for activities conducted by WS could occur through federal appropriations; however, in most cases, those entities requesting assistance would provide the funding for activities conducted by WS.

Alternative 2 - Bird Damage Management by WS through Technical Assistance Only

Under this alternative, WS would provide those cooperators requesting assistance with technical assistance only. Technical assistance would provide those cooperators experiencing damage or threats associated with birds with information, demonstrations, and recommendations on available and appropriate methods available. The implementation of methods and techniques to resolve or prevent damage would be the responsibility of the requester with no direct involvement by WS. In some cases, WS may provide supplies or materials that were of limited availability for use by private entities (e.g., loaning of propane cannons). Similar to the proposed action alternative, a key component of assistance provided by WS would be providing information to the requester about wildlife and wildlife damage. Educational efforts conducted under the proposed action alternative would be similar to those conducted under this alternative.

This alternative would place the immediate burden of using methods to alleviate damage on the resource owner, other governmental agencies, and/or private businesses. Those entities could take action using those methods legally available to resolve or prevent bird damage as permitted by federal, state, and local laws and regulations or those persons could take no action.

Alternative 3 – No Bird Damage Management Conducted by WS

This alternative would preclude any activities by WS to reduce threats to human health and safety, and alleviate damage to agricultural resources, property, and natural resources. WS would not be involved with any aspect of bird damage management in the state. All requests for assistance received by WS to resolve damage caused by birds would be referred to the USFWS, to the CT DEEP, and/or to private entities. This alternative would not deny other federal, state, and/or local agencies, including private entities, from conducting damage management activities directed at alleviating damage and threats associated with birds. Therefore, entities seeking assistance with addressing damage caused by birds could contact WS, but WS would immediately refer the requester to other entities. The requester could then contact other entities for information and assistance, could take actions to alleviate damage without contacting any entity, or could take no further action.

CONSISTENCY

Wildlife damage management activities conducted in Connecticut are consistent with work plans, MOU's, and policies of WS, the CT DEEP, and the USFWS. The USFWS has developed the Information, Planning, and Conservation System (IPaC) and website which provide the user an interactive planning and mapping tool for streamlining the environmental review process. WS would review these websites and the online measures on a site-by-site basis to determine if any T&E species are located within the project area in order to conclude with a determination of effects. In addition, WS has made a no effect determination for all T&E species listed by the CT DEEP.

MONITORING

The Connecticut WS program will annually review its effects on target bird 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 three alternatives, including the proposed action. Under the proposed action, the lethal removal of birds by WS would not have significant impacts on statewide bird populations when known sources of mortality were considered. No risk to public safety were identified under Alternative 1 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 when no assistance is provided under Alternative 3. 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 birds 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 Supplement prepared for this proposal. I find the proposed action alternative (Alternative 1) 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 and Supplement does not warrant the completion of an EIS.

Based on the analyses in the EA and Supplement, the need for action and the issues identified are best addressed by selecting Alternative 1 and applying the associated standard operating procedures. Alternative 1 successfully addresses (1) bird 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 1) as described in the EA.

Based on the analyses provided in the EA and Supplement, there are no indications that the proposed action (Alternative 1) 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. Bird 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 and Supplement, 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 bird 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 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 Connecticut.

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 would utilize the USFWS IPaC website on a site-by-site basis to determine if any T&E species are located within the project area in order to conclude with a determination of effects.

10. The proposed action would comply with all applicable federal, state, and local laws.

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) bird 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 would continue to provide effective and practical technical assistance and direct management techniques that reduce damage and threats of damage.

for Charles S. Brown, Director-Eastern Region
USDA/APHIS/WS
Raleigh, North Carolina

12/22/15
Date

LITERATURE CITED

Slate, D.A., R. Owens, G. Connolly, and G. Simmons. 1992. Decision making for wildlife damage management. Trans. N. A. Wildl. Nat. Res. Conf 57:51-62.

USDA (U.S. Department of Agriculture). 2013. Environmental Assessment: Reducing Bird Damage in the State of Connecticut. USDA APHIS WS, Amherst, MA.

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