

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**Reducing Wildlife Damage
through an
Integrated Wildlife Damage Management Program
in Palm Beach County, Florida**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife in Florida. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared. The EA documents the need for wildlife damage management (WDM) on properties owned and managed by the Palm Beach County Parks and Recreation Department (PBCPRD) in Palm Beach County, Florida and assessed potential impacts of various alternatives for responding to damage problems. The EA analyzes the potential environmental and social effects for resolving wildlife damage related to the protection of resources, and health and safety on PBCPRD property in Palm Beach County, Florida.

Wildlife Services is the Federal program authorized by law to reduce damage caused by wildlife (Act of March 2, 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c), and the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2001, Public Law 106-387, October 28, 2000. Stat. 1549 (Sec 767). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992). WS uses an Integrated Wildlife Damage Management (IWDM) approach, commonly known as Integrated Pest Management (WS Directive 2.105) in which a combination of methods may be used or recommended to reduce damage. WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). WS's proposed action is to implement an IWDM program that would include the use of non-lethal and lethal methods by WS and would also incorporate WS's current technical assistance approach to managing problem wildlife species. All WS wildlife damage management activities are in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973.

Consistency

The analyses in the EA demonstrate that Alternative 2: 1) best addresses the issues identified in the EA, 2) provides safeguards for public health and safety, 3) provides WS the best opportunity to reduce damage while providing low impacts on non-target species, 4) balances the economic effects to protected resources and property, and 5) allows WS to meet its obligations to government agencies or other entities.

Monitoring

The Florida WS program will annually review its impacts on target wildlife species and other species addressed in the EA each year to ensure that WS program activities do not impact the viability of target and non-target wildlife species. In addition, the EA will be reviewed each year to ensure that it and the analysis are sufficient.

Public Involvement

The pre-decisional EA was prepared and released to the public for a 30-day comment period by a legal notice in *The Palm Beach Post* on June 11, 2005. A letter of availability for the pre-decisional EA was also mailed directly to Palm Beach County, State, and Federal agencies. No requests were received for copies of the pre-decisional EA during the 30-day comment period, nor were any comments received during this time.

Affected Environment

The areas of the proposed action include properties owned and managed by Palm Beach County Parks and Recreation Department in Palm Beach County, Florida, including the parks identified in Appendix G of the EA.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- 1) Effects on Target Wildlife Species
- 2) Effects on Other Wildlife Species, Including T&E Species
- 3) Effects on Human Health and Safety
- 4) Impacts to Stakeholders, Including Aesthetics
- 5) Humaneness and Animal Welfare Concerns of Methods Used

Alternatives Analyzed in Detail

The following four alternatives were developed to respond to the issues. One additional alternative was considered but not analyzed in detail. Appendix B of the EA provides a description of the methods that could be used or recommended by WS under each of the alternatives. A detailed discussion of the effects of the Alternatives on the issues is described in the EA; below is a summary of the Alternatives.

Alternative 1 –Technical Assistance Only (No Action) – This alternative would not allow for WS operational WDM on PBCPRD properties. WS would only provide technical assistance and make recommendations when requested. The PBCPRD could conduct WDM using any legal lethal or non-lethal method available to them.

Alternative 2 – Integrated Wildlife Damage Management Program (Proposed Action) – The Palm Beach County Parks and Recreation Department has requested WS to assist in reducing conflicts and damage associated with wildlife on properties they own and manage in Palm Beach County, Florida. In responding to this request for assistance, WS proposes to implement an IWDM approach to reduce wildlife damage to property, natural resources, and human/public health and safety. An IWDM strategy would be recommended and used, encompassing the use 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, physical exclusion, habitat modification, or harassment would be recommended and utilized to reduce damage. In other situations, animals would be removed as humanely as possible using shooting, trapping, nest/egg destruction, chemical methods, and other products. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, 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. All management activities would comply with appropriate Federal, State, and Local laws.

Alternative 3 – Non-lethal Wildlife Damage Management Only By WS – This alternative would require WS to use non-lethal methods only to resolve wildlife damage problems on PBCPRD properties. Information on lethal WDM methods would still be available through other sources such as Florida Fish and Wildlife Conservation Commission, USDA Agricultural Extension Service offices, universities, or pest control organizations. The PBCPRD could choose to implement WS non-lethal recommendations, implement lethal methods, or methods not recommended by WS, contract for WS non-lethal direct control services, use contractual services of private businesses, or take no action. The PBCPRD could still resort to lethal methods that were available to them.

Alternative 4 – No Federal WS Wildlife Damage Management – This alternative would eliminate WS involvement in WDM on PBCPRD properties. WS would not provide direct operational or technical assistance. PBCPRD would have to conduct their own WDM without WS input. Information on WDM methods would still be available through other sources such as Florida Game and Freshwater Fish Commission, USDA Agricultural Extension Service offices, universities, or pest control organizations. The PBCPRD might choose to conduct WDM themselves, use contractual services of private businesses, or take no action.

Alternatives Considered but not Analyzed in Detail with Rationale

Lethal Wildlife Damage Management Only by WS - Under this alternative, WS would not conduct any non-lethal control of wildlife for WDM purposes on PBCPRD

properties, but would only conduct lethal WDM. This alternative was eliminated from further analysis because some wildlife damage problems can be resolved effectively through non-lethal means. Additionally, lethal methods may not always be available for use due to safety concerns or local ordinances prohibiting the use of some lethal methods, such as the discharge of firearms.

Finding of No Significant Impact (FONSI)

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

1. Wildlife damage management as conducted by WS in Palm Beach County, Florida is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety. Risks to the public from WS methods were determined to be low in a formal risk assessment (USDA 1997, Appendix P).
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. Built-in mitigation measures that are part of WS's standard operating procedures and adherence to laws and regulations will 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 wildlife 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 this assessment. The EA discussed cumulative effects of WS on target and non-target species populations and concluded that such impacts were not significant.
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. If an individual activity with the potential to affect historic resources is planned under the selected alternative, then site-

specific consultation as required by Section 106 of the NHPA would be conducted as necessary.

9. WS has determined that the proposed project would not adversely affect any Federal or Florida State listed threatened or endangered species. This determination is based upon concurrence from the US Fish and Wildlife Service and Florida Fish and Wildlife Conservation Commission that the project will not likely adversely affect any threatened or endangered species.
10. The proposed action would be in compliance with all federal, state, and local laws.

Decision and Rational

I have carefully reviewed the Environmental Assessment prepared for this proposal and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 2 (*Integrated Wildlife Damage Management - Proposed Action*) and applying the associated mitigation measures discussed in Chapter 3 of the EA. Alternative 2 is selected because (1) it offers the greatest chance at maximizing effectiveness and benefits to resource owners and managers while minimizing cumulative impacts on the quality of the human environment that might result from the program's effect on target and non-target species populations; (2) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health and safety; and, (3) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of these issues are considered. Therefore, it is my decision to implement the proposed action as described in the EA.

Copies of the EA are available upon request from the USDA, APHIS, WS, 2820 East University Avenue, Gainesville, FL 32641.



Charles S. Brown, Regional Director
USDA-APHIS-WS Eastern Region



Date

Literature Cited:

USDA. 1997. Final Environmental Impact Statement. U.S. Dept. Agric., Anim. Plant Health Inspection Serv., Animal Damage Control, Operational Support Staff, 4700 River Road, Unit 87, Riverdale, MD 20737.

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The Wildlife Society. 1992. Conservation policies of The Wildlife Society: A stand on issues important to wildlife conservation. The Wildlife Society, Bethesda, Md. 24pp.