

Decision and Finding of No Significant Impact

Predator Control on Cocos Island, Guam

United States Department of Agriculture,
Animal and Plant Health Inspection Service,
Wildlife Services

April, 2008

1. Introduction

The Guam Department of Agriculture has requested the assistance of United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services program (Wildlife Services) to eradicate rodents and control monitor lizards and possible future brown treesnake incursions on Cocos as part of an ecosystem restoration project that would in part remove non-native predators of the endangered Guam rail (*Gallirallus owstoni*, also called Ko'ko') to prepare habitat for its establishment.

The EA presents an analysis of the potential impacts of the proposed project to assist the Government of Guam with integrated predator control with rodent eradication via trapping, hand broadcast of diphacinone and if necessary, brodifacoum, and brodifacoum bait stations, monitor lizard control via trapping and shooting and brown treesnake control via trapping and toxicants (Alternative 1). The proposed action was compared with an alternative that would use integrated predator control with rodent eradication via trapping, brodifacoum hand broadcast and bait stations, monitor lizard control via trapping and shooting and brown treesnake control via trapping and toxicants (Alternative 2). In addition, a No Action alternative was compared under which WS would take no action to control predators (Alternative 3).

I have reviewed the final EA dated April 2008 and the public and agency comments received on the EA, and I have decided to adopt the proposed action (Alternative 1 - integrated predator control with rodent eradication via trapping, hand broadcast of diphacinone and if necessary, brodifacoum, and brodifacoum bait stations, monitor lizard control via trapping and shooting and brown treesnake control via trapping and toxicants) as described in the EA, and to issue this Finding of No Significant Impact (FONSI).

2. Purpose

The purpose of the selected program is to assist the Government of Guam with creating a rodent free environment for establishing the endangered Guam rail on the island, and follow-up to maintain that status, as described in the EA. The EA also contains provisions for controlling other predators if needed (monitor lizards and rodent and brown treesnake incursions) The need

for action as described in the EA presents the nature and extent of predation threats and how the proposal would assist with other efforts to restore the ecosystem on Cocos Island.

3. Issues

The following issues, fully defined in the EA, were identified during the NEPA process as important to Wildlife Services, the cooperating agencies and the public, and were used to drive the environmental analysis and compare the impacts of the alternatives.

- The effectiveness of the program was added to the environmental impact analysis to determine which alternatives would most likely meet program objectives.
- Impacts on vegetation
- Effects on human health and safety
- Effects on the ecology and environment
- Economic effects
- Social values

4. Decision and Rationale

The alternative courses of action were developed based on the reasonable options that could be used by Wildlife Services to assist the Government of Guam with removing predators of the Guam rail. For the reasons indicated below, I have decided to select the proposed action as described in the EA and to issue a FONSI.

Alternative 1: Proposed Action Integrated Predator Control with Rodent Eradication via Trapping, Hand Broadcast of Diphacinone and if Necessary, Brodifacoum, and Brodifacoum Bait Stations, Monitor Lizard Control via Trapping and Shooting and BTS Control via Trapping and Toxicants)

The proposed action is an integrated approach that would use trapping, hand broadcast of the toxicant diphacinone and brodifacoum bait stations as a primary tool to eradicate rats. Hand broadcast of brodifacoum would only be used if diphacinone applications failed to achieve eradication of rats and mice, and only when and if a label becomes approved by the US Environmental Protection Agency, as discussed in the EA. Monitor lizards would be controlled by trapping and shooting, and brown treesnakes would be controlled with trapping and toxicants if they are found on the island (currently they are not present). Based on variables encountered in the field such as vegetation, proximity to human uses, or levels of predator use, Wildlife Services will select the most appropriate methods to use.

Based on the analysis in the EA, the proposed alternative was found to have a high potential for success in eradication of non-native rodents, and be effective in controlling other species as defined in the proposed action, including a plan to control future incursions should that become an issue. There would be negligible commitments of irreversible and irretrievable resources (from the use of fossil fuels and electrical energy), and there would not be any significant

cumulative effects on non-target animals, humans, or the environment. The proposed action is expected to have a low negative effect on avian species while providing a benefit to the Guam rail by removing predators prior to its establishment. Wildlife Services has obtained a concurrence from the USFWS that the proposal is not likely to adversely affect the endangered green sea turtle. The EA revealed that fish are unlikely to be affected and minimal negative effects on native lizards are expected. Crabs and other invertebrates are not expected to be adversely affected. No protected plant species would be harmed. The proposal would be likely to benefit native species by removing rodents. Based on the low potential for risks to public health and the precautions and public notification procedures as discussed in the EA, no effects on public health are expected from the use of toxicants or other methods. Ecological effects are expected to be beneficial by removing non-native predators. The proposed action would require a short term crab harvest moratorium on Cocos Island. The proposal may in part enhance tourism if a natural environment is restored.

Alternative 2 – Integrated Predator Control with Rodent eradication via Trapping, Brodifacoum Hand Broadcast and Bait Stations, Monitor Lizard Control via Trapping and Shooting and BTS Control via Trapping and Toxicants

This alternative differs from the proposed action in that it would rely on the more toxic rodenticide brodifacoum to eradicate rats and mice. Under this alternative, the EA describes that the use of brodifacoum may be more effective in eradicating rats and mice and would require only one application. Other aspects of the alternative in controlling monitor lizards, incursions of brown treesnake and reinvasion of rodents would be the same as Alternative 1. Non-target effects from the use of brodifacoum would be expected to be higher in birds, invertebrates, sea turtles, fishes and lizards than under the proposed action. The effects on vegetation would be the same as under the proposed action. While risks to humans is higher under this alternative, precautions included in the proposed action (moratorium on crab collection, notifications) to reduce human exposure would result in this alternative having a minimal potential risk to human health and safety. This alternative was not selected because of higher toxicity risks.

Alternative 3 No Action

This alternative would not allow Wildlife Services to assist the Government of Guam with predator control to benefit the Guam rail. Wildlife Services would have no effect on any of the resource issues identified. It is expected that rodents and other non-native predators would continue to thrive on Cocos Island and would hamper or prevent successful establishment of the Guam rail. This alternative was not selected since it would not allow WS to fulfill its mission to assist the Government of Guam with its request to assist in improving the ecology of Cocos Island.

5. Public Involvement

Public participation in the National Environmental Policy Act (NEPA) process for the pre-decision EA was conducted consistent with Wildlife Service's NEPA procedures. Issues related

to the proposed action were identified from Wildlife Services, cooperating agency input, prior public involvement for other EAs, and a 30-day public comment period for the pre-decision EA. The pre-decision EA was prepared in consultation with cooperating agencies and a pre-decisional EA was issued to the public on January 28, 2008 via direct mailings to individuals and groups thought to be interested in the proposal, publication of legal notices in the Pacific Daily News, and posting the document on the Wildlife Services NEPA web page at http://www.aphis.usda.gov/regulations/ws/ws_nepa_environmental_documents.shtml. Public comments received on the pre-decision EA are included in the Final EA as Appendix C. A series of signatures were obtained in the form of a petition that opposed the proposal, however they were not provided as comment on the EA. The petition concerns were included in the public comments the EA in Appendix C. A notice of the availability of a Final EA and this Decision and FONSI will be issued to the public in the same manners as the pre-decision EA.

Finding of No Significant Impact

A careful review of the EA indicates that there will not be a significant impact on the quality of the human environment as a result of this proposal. I agree with this conclusion, and therefore, determine that an Environmental Impact Statement (EIS) will not be prepared. This determination is based on consideration of the following factors:

1. The proposed activities will occur in localized areas on Cocos Island as requested by the Government of Guam. The proposed activities are not national or regional in scope.
2. The proposed activities will not significantly affect public health and safety. The methods used and the precautions built into the proposed action are not likely to affect public health and safety.
3. The proposed activities will not have an impact on unique characteristics of the geographic area such as historical or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas. The nature of the methods proposed do not affect the physical environment.
4. The effects on the quality of the human environment of the proposed activities are not highly controversial. Although some people are opposed to the use of toxicants, the methods and impacts are not controversial among experts.
5. The possible effects of the proposed activities on the quality of the human environment are not highly uncertain and do not involve unique or unknown risks.
6. The proposed activities do not establish a precedent for actions with future significant effects or represent a decision in principle about a future consideration.
7. There are no significant cumulative effects identified by this assessment. The EA described that the cumulative effects when combined with other past, present and reasonably foreseeable future effects will not significantly affect the environment on Cocos Island.
8. The proposed activities will not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places nor will it cause a loss or destruction of significant scientific, cultural, or historical resources. The methods proposed do not have the potential to affect historic properties.
9. The proposed activities will fully comply with the Endangered Species Act of 1973, as amended. The proposed activities would not be likely to adversely affect the green sea turtle, and may provide benefit by removing nest and egg predators.
10. There are no irreversible or irretrievable resource commitments identified by this assessment, except for a minor consumption of fossil fuels and electricity for routine operations.

