

**Finding of No Significant Impact and Decision  
for  
Bird Damage Management in Oklahoma**

The U.S. 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 caused by wildlife in Oklahoma. WS activities are conducted in cooperation with other federal, state, and local agencies, as well as private organizations and individuals.

WS prepared an environmental assessment (EA) to conduct bird damage management (BDM) in Oklahoma. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management (WDM) actions, and research and developmental activities may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). However, we prepared the EA to conduct BDM throughout Oklahoma to facilitate planning and interagency coordination, to streamline program management, and to clearly communicate with the public the analysis of cumulative impacts. The predecisional EA, released by WS in July 2003, documented the need for BDM in Oklahoma and assessed potential impacts and effects of various alternatives addressing the resolution of bird damage problems. This EA is tied to the programmatic Environmental Impact Statement (EIS) for the Wildlife Services Program<sup>1</sup> (USDA 1997).

WS' proposed action is to conduct BDM in Oklahoma utilizing Integrated Wildlife Damage Management (IWDM) principles to mitigate or alleviate bird damage or bird damage threats to resources in a biologically and environmentally sound manner. An IWDM approach would be implemented which would allow use of any legal technique or method, used singly or in combination, to meet requests or needs for resolving conflicts with wildlife affecting valued resources which could include agriculture, property, livestock, natural resources, and human health and safety.

WS cooperates with the Oklahoma Department of Agriculture, Food and Forestry (ODAFF) as authorized under State Law, Title 2, O.S.2001, §12-1, in the management of bird damage. In Oklahoma, state statutes permit landowners and resource managers to take many bird species (those not requiring a federal permit) including European starlings (*Sturnus vulgaris*), feral domestic pigeons (*Columbia livia*), and house sparrows (*Passer domesticus*) and crows (*Corvus brachyrhynchos*) and blackbirds (the blackbird group, Subfamily Icterinae (including red-winged (*Agelaius phoeniceus*), rusty (*Euphagus carolinus*), Brewer's (*E. cyanocephalus*), and yellow-headed blackbirds (*Xanthocephalus xanthocephalus*); brown-headed cowbird (*Molothrus ater*); great-tailed grackle (*Cassidix mexicanus*), and common grackle (*Quiscalus quiscula*)) under a U. S. Fish and Wildlife Service (USFWS) Standing Depredation Order when they are causing damage. These species are responsible for the majority of requests for BDM in Oklahoma and are targeted most often. The WS BDM EA only evaluated alternatives for WS involvement in management of bird damage to resources. Therefore, a major overarching factor in determining how to analyze potential environmental impacts of WS' involvement in BDM in Oklahoma is that such management will apparently be conducted by state, local government, or private entities that are not subject to compliance with NEPA if WS is not involved. In fact, the Secretary of Agriculture over ODAFF has stated in a letter that in the event that WS does not conduct BDM, ODAFF would with available State resources. This means that the Federal WS program has limited ability to affect the environmental outcome of BDM in the state, except that the WS program is likely to have lower risks to

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<sup>1</sup> USDA, (APHIS) Animal and Plant Health Inspection Service, (ADC) Animal Damage Control Program. 1997 (revised). Final Environmental Impact Statement. USDA, APHIS, WS Operational Support Staff, 4700 River Road, Unit 87, Riverdale, MD 20737.

nontarget species and less impact on bird populations than some alternatives available to ODAFF and private landowners. Therefore, WS has limited ability to affect the environmental *status quo*. Despite this limitation of federal decision-making in this situation, this EA process is valuable for informing the public and decision-makers of the substantive environmental issues and alternatives of BDM for resource protection.

### **Public Involvement**

Following interagency review of a preliminary draft of the EA, including USFWS, ODAFF, and the Oklahoma Department of Wildlife Conservation, a predecisional EA was prepared. The predecisional EA was available for public review and comment during a 41-day period (July 11 – August 20, 2003), which complies with public involvement guidelines/policies contained in NEPA, Council On Environmental Quality (CEQ) regulations, and APHIS's Implementing Regulations, as well as all pertinent agency laws, regulations, and policies. A Legal Notice of Availability was published in the Daily Oklahoman, a daily newspaper with statewide coverage, for three days (July 11- July 13, 2003). Additionally, a mailing list of potentially interested parties which included Native American Tribes, agencies, interested groups and individuals was compiled from previous NEPA document mailings and 99 separate entities were identified from this process; the predecisional EA was mailed directly to these persons and groups in early July. The EA was also made available for public review at the WS State Office, 2800 N. Lincoln, Blvd., Oklahoma City, OK, and by any requests through the U.S. Mail. As a result of the newspaper and mailings, one more EA was sent by mail and two additional copies of the EA were supplied from requests in person at the WS State Office.

### **Public Comments**

Upon the closing date, August 20, 2003, two public comment letters were received in response to the predecisional EA, one from a state agency and the other from a non-profit organization. The letters included several comments which are discussed below.

**Comment 1a:** "We believe that that the scope of the EA is too broad, both in terms of the bird species ... that would be affected by the proposed action."

**Response:** The EA covered a number of bird species including European starlings, blackbirds, house sparrows, feral domestic pigeons, crows and jays (family Corvidae), egrets and herons (family Ardeidae), woodpeckers (family Picidae), gulls (Lauridae), cormorants (Phalacrocoracidae), waterfowl (family Anatidae), coots (*Fulica americana*), swallows (family Hirundinidae), owls (order Strigiformes), and raptors including hawks, kites, vultures (order Falconiformes). BDM projects protecting resources in Oklahoma often involve many of these species at one site. BDM at airports could virtually involve any of the above species or a species from a group that resides or migrates through Oklahoma. Therefore, to provide the best cumulative impact analysis for these species from WS BDM, it is important to be all inclusive. The impacts analysis in Chapter 4 discusses those species that are targeted the most by WS BDM activities and impacts to their populations. This is actually only a small portion of the species or species in groups given above (about 17 of 88 normally found in Oklahoma). The remaining species are very infrequently the target of BDM activities, and the take of no more than a few in a given year would not impact these populations. According to NEPA implementing guidelines, BDM actions involving these other species could be Categorically Excluded, but they were included to give the reader a better understanding of BDM in Oklahoma.

**Comment 1b:** "We believe that that the scope of the EA is too broad, both in terms of . . . and the geographic region that would be affected by the proposed action."

**Response:** Bird management data compiled by regulatory/management agencies and groups in Oklahoma are most reflective of populations at a statewide level, as compared to a specific site; bird management information also used by WS includes various surveys (i.e. the Breeding Bird Surveys, Audubon Christmas Counts, etc.), legal harvest/take estimates, etc. This information tends not to be significant at the local level (populations can vary widely from year to year), but, at best, the statewide level (often information is only significant at the regional level). Birds, by the ability of flight and their behavior (including migration and various dispersal mechanisms) are not confined to the boundaries of the State; therefore, much of the information compiled by Federal management agencies may also include regions (multiple states or areas) or flyways that can stretch the distance of the Americas. The Migratory Bird Treaty Act, which protects the conservation of migratory birds in Canada, the U.S. and Mexico, purposefully has a broad scope of geographic areas for this very reason. The geographic scope of the EA was addressed in Section 1.6.3 and then again the issue of being too broad geographically was addressed briefly in Section 2.3.1 of the EA. Federal agencies have the discretion to determine the geographic scope of their NEPA analyses and WS has determined that preparation of this EA to address BDM activities for Oklahoma in its entirety is appropriate. In terms of considering local cumulative impacts, one EA covering BDM activities in Oklahoma is likely to provide a better analysis of impacts than multiple EA's covering smaller zones within the analysis area. The information from agencies and surveys helps WS to monitor cumulative impacts in Oklahoma and at the regional level. A more detailed and more site-specific level of analysis would not substantially improve the decision-making process, and pursuing a more site-specific and more detailed analysis might even be considered inconsistent with NEPA's emphasis on reducing unnecessary paperwork (Eccleston 1995).

**Comment 2:** "We find the document to be a thorough coverage of the biological and programmatic issues."

**Response:** WS is mandated by Congress to manage wildlife damage to various resources. Wildlife is a valued public resource and WS is concerned with potential environmental impacts that could occur from wildlife management practices. The ultimate purpose of the NEPA process through this EA is to make the proper decisions based on analysis of biological and programmatic issues through various alternatives.

**Comment 3:** "Though birds in Oklahoma may be susceptible to 65 zoonotic diseases, this says nothing of the likelihood of such transmission of diseases to humans. The citations for these diseases were over 30 years old."

**Response:** The prevention of disease is a need for action (discussed in Section 1.3.2), but only a part of the overall need for BDM in Oklahoma (Section 1.3). The likelihood or extent of disease transmission from birds to humans is largely unknown, and in the case of some zoonotics, may never be known or fully understood. This is true of many other diseases, beyond wildlife zoonotics. The Centers for Disease Control (CDC) does monitor a few of the zoonotic diseases, but not all of them because they are not reportable diseases. CDC and other zoonotic disease websites have stated that many zoonoses are grossly underreported because they may not cause symptoms in all humans or mimic other diseases such as influenza. In the publication, "Pocket Guide to the Humane Control of Wildlife in Cities and Towns", it is stated, "Wildlife serves as a reservoir for many diseases common to domestic animals and humans. Persons engaged in wildlife damage control should be alert to the potential for disease transmission from animals." (HSUS, 1991). The purpose of BDM is to minimize overall risk and the potential of human exposure to wildlife zoonoses and reduce damage associated with birds for other resources as discussed in Section 1.3 of the EA. Finally, the references used in the EA for bird diseases came from the late 1970s. However, not much new research has been conducted on the potential for commensal bird species (pigeons, starlings, and house sparrows) to transmit diseases to humans, but what has been done is still valid (R. McClain, DVM, NWRC, pers. comm. 2003)

**Comment 4:** "I would suggest a change in the wording describing section 2.3.6. I believe that a statement incorporating the term mortality rates may be more accurate . . ."

**Response:** Section 2.3.6 describes the numbers of birds that die in any given year to various causes, and the terminology was based on previous comments in regard to the subject. The term "mortality rates" would likely be a more descriptive term to describe the occurrence.

**Comment 5:** "...we are surprised to find absolutely no indication of the *effectiveness* of BDM, as outlined in the proposed action, in reducing any of these types of damage [damage to agriculture, property and nuisance complaints] or in reducing depredations to livestock and poultry."

**Response:** A very challenging task for WS has been to determine the effectiveness of WS applied BDM because one must first predict how much more damage would have occurred if a control strategy had not been implemented. With this number, cost effectiveness can be determined for resources with monetary value, but cannot for nonmonetary values such as the protection of human lives at airports or disease prevention. WS would not continue to be requested for services by the public, had control strategies not been effective at stopping or curtailing damage.

The need for action is established in Section 1.3 of the EA. It is known that bird damage can and does occur to resources. Without any action to mitigate for that damage, it can be stated that bird damage events will continue to occur. For example, pigeons are well known to accelerate the deterioration of a building such as a mall and, if left unchecked, can result in tens of thousands of dollars in damage rapidly. Spending up to a few thousand dollars to remove pigeons inhabiting the building and retrofitting the building and its components such as air conditioning units with exclusionary devices can make an area relatively pigeon-free for years and save the owner thousands and thousands of dollars. The application and resulting effectiveness of BDM would vary conditionally, but would likely halt or alleviate the rate at which damages to resources occur. For example, an airport in Oklahoma documented that bird strikes before BDM averaged 222 strikes to aircraft annually; after the application of BDM, bird strikes were reduced by 44% or about 126 strikes annually. The value of this reduction cannot be determined because the primary goal is to reduce the potential for a catastrophic accident involving human lives.

**Comment 6:** "...we are concerned that the management methods listed may not include the most recent innovations in methods for preventing and reducing bird damage, many of which are developed by researchers at the USDA/APHIS/WS/National Wildlife Research Center."

**Response:** WS' National Wildlife Research Center (NWRC) is a world leader in the development of new BDM strategies. NWRC developments include many of the methods, including effigies, described in Appendix E of the EA, "Bird Damage Management (BDM) Methods Available for Use or Recommended by the Oklahoma Wildlife Services Program"; these methods developed by NWRC are for field use by the program. They have determined through research that many of these methods are effective in resolving damage. NWRC routinely updates WS operations with new techniques and methods used in BDM and WS does keep up with these. When new products are available, NWRC typically will determine if these methods are effective in reducing damage. Product owners often readily tell the public and WS the effectiveness of their product. However, WS may not necessarily use these until it is determined that they are effective in reducing damage. A good example is the use of ultrasonics to deter birds such as pigeons. It was claimed to be very effective for birds, but NWRC found that they had no value in tests (R. Dolbeer, WS, pers. comm... 2003).

**Comment 7:** "We are . . . concerned that WS in Oklahoma may not be up to date on the latest innovations in bird damage reduction, particularly techniques that can effectively prevent or control

damage (or nuisance complaints) either non-lethally or with a minimum of pain and suffering by the animals targeted.”

**Response:** WS' National Wildlife Research Center (NWRC) is a world leader in the development of new BDM strategies. NWRC developments and BDM methods in Oklahoma are discussed in Section 3.3.1.4, and also Appendix E, "Bird Damage Management (BDM) Methods Available for Use or Recommendation by the Oklahoma Wildlife Services Program." Humaneness and animal welfare are identified as an issue in Chapter 2, section 2.2.5, and analyzed in Chapter 4, section 4.1.8. We believe that the EA speaks for itself.

**Comment 8:** "... we find it remarkable that WS has not included an alternative that would require, in each damage situation, that all feasible non-lethal methods be exhausted before turning to lethal control of birds." "...would prefer the use of only non-lethal control and management techniques, a "lethal before non-lethal" strategy could be designed in such a way that it should be acceptable to most individuals experiencing bird damage, as well as most members of the general public who are concerned for the welfare and conservation of wild birds."

**Response:** From the context, it is interpreted that the commenter meant "non-lethal before lethal" rather than "lethal before non-lethal"; however, both the "lethal before non-lethal" or "non-lethal before lethal" strategies contain regimented elements that interfere with IWDM methodology and the WS Decision Model. WS Directive 2.101 provides guidelines used for selecting control methods. It is WS policy to give preference to nonlethal methods first where their implementation would be practical and effective. Because each BDM situation is different and is subject to further variables, the implementation of mandated control options does not adhere to a strategy of IWDM (WS Directive 2.105), where the flexibility of multiple methods can precipitate a cumulative effect (Chapter 1, section 1.3, Need for Action, also section 3.3). In order to implement IWDM, the WS Decision Model (WS Directive 2.201 – Appendix F of the EA) is also involved to insure the most appropriate decision is made for the situation. The nonlethal before lethal strategy was analyzed in the WS Final Environmental Impact Statement (USDA 1997) and many WS EAs; this Alternative has always been found to have higher negative environmental impacts than the current Proposed Action in the EA. Therefore, this Alternative was not considered in the EA. The EA adequately addressed a range of Alternatives, wide enough to provide the decision-maker with enough information to make an informed decision.

## **Monitoring**

WS monitoring procedures direct that State Directors within the agency assure that each EA (for those which they are responsible), the Decision associated with the EA, and the activities specified in the Decision will be reviewed annually for applicability and accuracy of the documents, monitoring compliance, and the need for further analysis and documentation due to new information or changes in activities. A report of this review is prepared and filed in the respective WS State or District Office and with the appropriate WS Regional Director's Office. This EA will be reviewed annually to ensure that it is complete and still appropriate to the scope of WS's BDM activities.

## **Major Issues**

WS and other agencies helped identify a variety of issues deemed relevant to the scope of this EA. These issues were consolidated into the following five primary issues that were considered in detail in the predecisional EA:

Effects on Target Bird Species Populations  
Effects on Nontarget Species Populations, including T&E Species

Effects on Human Health and Safety  
Effects on Aesthetics  
Humaneness of Lethal Methods Used by WS

### **Alternatives Analyzed in Detail**

Four potential alternatives were developed to address the issues identified above. Four additional alternatives were considered, but not analyzed in detail. A detailed discussion of the anticipated effects of the alternatives on the objectives and issues is described in Chapters 3 & 4 of the predecisional EA. The following summary provides a brief description of each alternative and its anticipated impacts.

#### **Alternative 1 - Continue the Current Federal BDM Program (No Action/Proposed Action)**

The No Action Alternative is a procedural NEPA requirement (40 CFR 1502), 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 the Council on Environmental Quality's (CEQ's) definition (CEQ 1981). In the case of the BDM EA for Oklahoma, the No Action Alternative was the equivalent of the Proposed Action Alternative and the Current Program.

Under the current program, WS responds to requests for BDM to protect human health and safety, agricultural resources, crops, turf, landscaping, livestock feed, livestock, livestock health, property, natural resources, threatened and endangered species, other wildlife, forestry and aquaculture in the State of Oklahoma. A major component of the current program is the protection of human health and safety at airports and property from wildlife strikes to aircraft. Another important portion of the current program is implementing an integrated strategy to minimize damage or the risk of damage to pecans and peanuts from wintering and resident crows in the State. The program would also operate to reduce or minimize the loss of livestock feed and the risk of bird-related livestock health problems presented by starlings and blackbirds at requesting dairies and feedlots, and to meet requests to minimize bird damage or the risk of damage to all other resources. To meet these goals WS would have the objective of responding to all requests for assistance with, at a minimum, technical assistance or self-help advice, or, where appropriate and when cooperative or congressional funding is available, direct damage management assistance in which professional WS Specialists and/or Biologists conduct damage management actions. An IWDM approach would be implemented which would allow use of any legal technique or method, used singly or in combination, to meet the needs of requestors for resolving conflicts with birds. Agricultural producers and others requesting assistance would be provided with information regarding the use of effective nonlethal and lethal techniques. In many situations, the implementation of nonlethal methods such as exclusion-type barriers would be the responsibility of the requestor to implement which means that, in those situations, WS's only function would be to implement lethal methods if determined to be necessary. BDM by WS would be allowed in the State, when requested, on private property sites, public facilities or other locations where a need has been documented, upon completion of an Agreement for Control. All management actions would comply with appropriate Federal, state, and local laws.

#### **Alternative 2 - Nonlethal BDM Only By WS**

This alternative would require WS to use nonlethal methods only to resolve bird damage problems. Persons receiving technical assistance could still resort to lethal methods that were available to them. Currently, DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal.

### **Alternative 3 - Technical Assistance Only**

This alternative would not allow for WS operational BDM in Oklahoma. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, or others could conduct BDM using any lethal or nonlethal method available. Avitrol could only be used by State certified pesticide applicators. Currently, DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal.

### **Alternative 4 - No Federal WS BDM**

This alternative would eliminate Federal involvement in BDM in Oklahoma. WS would not provide direct operational or technical assistance and requesters of WS services would have to conduct their own BDM without WS input. DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal. Avitrol could be used by any State certified restricted-use pesticide applicator.

### **Alternatives considered but not analyzed in detail were:**

**Lethal BDM Only By WS** - Under this alternative, WS would not conduct any nonlethal control of birds for BDM purposes in the State, but would only conduct lethal BDM. This alternative was eliminated from further analysis because many situations can be resolved effectively through nonlethal means. Lethal BDM Only does not interface with the overall concept of IWDM, where multiple methods can achieve a desired cumulative effect. Restricting that portion of the program to lethal methods only would likely not be socially acceptable to various agencies, groups and individuals.

**Compensation for Bird Damage Losses** - The Compensation alternative would require the establishment of a system to reimburse persons or entities impacted by bird damage. This alternative was eliminated from further analysis because no federal or state laws currently exist to authorize such action. Under such an alternative, WS would not provide any direct control or technical assistance. Aside from lack of legal authority, analysis of this alternative in the FEIS indicated that the concept has many drawbacks including exorbitant costs (USDA 1997).

**Short Term Eradication and Long Term Population Suppression** - An eradication alternative would direct all WS program efforts toward total long term elimination of bird populations on private, state, local government, and tribal lands within entire cooperating counties or larger defined areas in the State. In Oklahoma, eradication of native bird species is not a desired population management goal of state agencies and most members of the public. It is not realistic or practical to consider large-scale population suppression as the basis of the WS program. Typically, WS activities in the State would be conducted on a very small portion of the sites or areas inhabited or frequented by problem species.

**Use of Bird-Proof Feeders in Lieu of Lethal Control at Dairies and Cattle Feeding Facilities** - A number of feeder designs have been proposed that would limit the access of livestock feed to free-ranging birds. Similar type systems could be recommended by WS under the current program should any become available that are effective, practical, and economically feasible for producers to implement; therefore, bird-proof feeders would be a partial solution in an IWDM strategy. Because of these factors, this alternative was not considered any further, but will be for individual producers where this could work effectively.

## **Finding of No Significant Impact**

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 the Proposed Action. I agree with this conclusion and therefore find that an Environmental Impact Statement need not be prepared. This determination is based on the following factors:

1. BDM, as conducted by WS in Oklahoma, is not regional or national in scope. It is a statewide program and the scope was discussed thoroughly in the EA.
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 activities. In addition, risks from most BDM methods used by WS have been analyzed in USDA (1997) and found to pose only minimal risks to the public, pets and nontarget wildlife species. This issue was addressed in the EA and the Proposed Action was found to have the least impacts.
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. Almost all BDM projects conducted by WS occur in urban, agricultural and other developed areas. None of the methods used in BDM would have an adverse significant effect on these areas as discussed in the EA.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to bird control, this action is not highly controversial in terms of size, nature, or effect. No bird population will be significantly affected by BDM under the Proposed Action, but is more uncertain under the other Alternatives depending on the efforts of other individuals to conduct BDM and the hypothetical illegal use of toxicants.
5. Based on the analysis documented in the EA, the effects of the proposed BDM program on the human environment would not be significant. The effects of the activities under the Proposed Action are not highly uncertain and do not involve unique or unknown risks. The other Alternatives could potentially involve unique and unknown risks by non-professionals implementing BDM and frustrated property owners that have been ineffective with BDM resorting to the illegal use of chemicals.
6. The proposed action would not establish a precedent for any future action with significant effects. All issues under the proposed action were discussed thoroughly, and these would not add cumulatively to any known future actions that would result in significant effects.
7. No significant cumulative effects on the quality of the human environment were identified through this assessment. The number of animals of any of the species taken by WS, added to the total known other take of such species, is either within levels sustainable by populations or is within levels authorized or desired by the responsible Federal and State agencies that represent their interests.
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 anything, the Proposed Action would have beneficial effects on these resources.

9. An evaluation of the proposed action and its effects on T&E species determined that no significant adverse effects would occur to such species. This is supported by the 1992 Biological Opinion (USDA 1997) and a subsequent Biological Assessment (WS 1999) with Concurrence from USFWS (1999). No other T&E species have been listed in Oklahoma since then.
10. The proposed action would be in compliance with all Federal, State, and local laws imposed for the protection of the environment. The proposed activity does not violate the Migratory Bird Treaty Act, the Endangered Species Act, or any other law. It is most probable that these could be broken under the other alternatives by the potential illegal use of chemicals by frustrated resource owners.
11. There are no irreversible or irretrievable resource commitments identified by this assessment, except for a minor consumption of fossil fuels for routine operations.

#### Literature Cited

Eccleston, C. 1995. Determining when an analysis contains sufficient detail to provide adequate NEPA coverage. Federal Facilities Environmental Journal, Summer. p. 37-50.

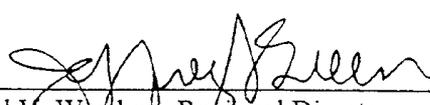
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#### Decision

I have carefully reviewed the EA and the input resulting from the public involvement process. I believe the issues and objectives identified in the EA would be best addressed through implementation of Alternative 1 (the proposed action to continue the current program). Alternative 1 is therefore selected because (1) it offers the greatest chance at maximizing effectiveness and benefits to affected resource owners and managers within current program funding constraints; (2) it will maximize selectivity of methods available; (3) it offers a balanced approach to the issue of humaneness when all facets of the issue are considered; (4) it will continue to minimize risk to or conflicts with the public; and (5) it will minimize risks to nontarget and T&E species. WS in Oklahoma will continue to use an Integrated Wildlife Damage Management approach in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA.

For additional information regarding this decision, please contact John E. Steuber, USDA-APHIS-WS, 2800 N. Lincoln Blvd., Oklahoma City, Oklahoma, (405) 521-4039.

  
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Michael V. Wooten, Regional Director  
APHIS-WS Western Region

Date

10/9/03