DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT

ENVIRONMENTAL ASSESSMENT: MAMMAL DAMAGE MANAGEMENT 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) 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 Connecticut (USDA 2015). The EA documents the need for action and assesses potential impacts on the human environment of three alternatives to address that need.

PUBLIC COMMENTS

The EA was made available for review and comment from April 1 to May 9, 2015 through a Notice of Availability (NOA) published in the *Hartford Courant* and sent to interested parties through the APHIS stakeholder registry. WS also published this EA on the program website. No comments were received. All correspondence on the EA is maintained at the WS State Office, USDA APHIS Wildlife Services, 463 West Street, Amherst, MA 01002.

ISSUES ASSOCIATED WITH MAMMAL DAMAGE MANAGEMENT ACTIVITIES

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

- Effects on target mammal populations
- Effects on other wildlife species, including threatened and endangered (T&E) species
- Effects on human health and safety
- Humaneness and animal welfare concerns of methods

AFFECTED ENVIRONMENT

Mammal damage or threats of damage can occur statewide 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 three alternatives were developed to respond to the issues identified in Chapter 2 of the EA (USDA 2015). 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: Continue the Current Adaptive Integrated Mammal Damage Management Program (No Action/Proposed Action)

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, to reduce damage and threats caused by mammals. WS, in consultation with the CT DEEP, would continue to respond to requests for assistance with, at a minimum, technical assistance, or when funding is available, operational damage management.

The adaptive approach to managing damage associated with mammals would integrate the use of the most practical and effective methods to resolve a request for damage management as determined by site-specific evaluation to reduce damage or threats to human safety for each request. City/town managers, agricultural producers, property owners, and others requesting assistance would be provided information regarding the use of appropriate non-lethal and lethal techniques. To be most effective, damage management activities should begin as soon as mammals begin to cause damage. Mammal damage that has been ongoing can be difficult to resolve using available methods since mammals are conditioned to an area and are familiar with a particular location. Subsequently, making that area unattractive through the use of available methods can be difficult to achieve once damage has been ongoing. WS would work closely with those entities requesting assistance to identify situations where damage could occur and begin to implement damage management activities under this alternative as early as possible to increase the likelihood of those methods achieving the level of damage reduction requested by the cooperating entity.

Under this alternative, WS would 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 mammals, or 3) provide technical assistance and direct operational assistance to a property owner or manager experiencing damage. The take of many of the mammal species native to Connecticut or designated a game species can only legally occur through regulated hunting and trapping seasons or through the issuance of a permit or license by the CT DEEP and only at levels specified in the permit.

Alternative 2: Non-lethal Mammal Damage Management Only by WS

Under this alternative, WS would be restricted to only using or recommending non-lethal methods to resolve damage caused by mammals. Lethal methods could continue to be used under this alternative by those persons experiencing damage by mammals without involvement by WS. In situations where non-lethal methods were impractical or ineffective to alleviate damage, WS could refer requests for information regarding lethal methods to the CT DEEP, local animal control agencies, or to private businesses or organizations. Property owners or managers might choose to implement WS' non-lethal recommendations on their own or with the assistance of WS, implement lethal methods on their own, or request assistance (nonlethal or lethal) from a private or public entity other than WS. Property owners/managers frustrated by lack of WS' assistance with the full range of mammal damage management techniques may try methods not recommended by WS or use illegal methods (e.g., poisons). In some cases, property owners or managers may misuse some methods or use some methods in excess of what is necessary.

Alternative 3: No Mammal Damage Management Conducted by WS

This alternative would preclude any and all activities by WS to reduce threats to human health and safety, and to alleviate damage to agricultural resources, property, and natural resources. WS would not be involved with any aspect of mammal damage management. All requests for assistance received by WS to resolve damage caused by mammals would be referred to the CT DEEP and/or other private entities.

Despite no involvement by WS in resolving damage and threats associated with mammals, those persons experiencing damage caused by mammals could continue to resolve damage by employing those methods legally available since the take of mammals to alleviate damage or threats can occur despite the lack of involvement by WS. The take of mammals could occur through the issuance of permits by the CT DEEP, when required, and during the hunting or trapping seasons.

CONSISTENCY

Wildlife damage management activities are consistent with work plans, MOU's, and policies of WS, the CT DEEP, and the US Fish and Wildlife Service (USFWS). WS consulted with the CT DEEP regarding potential risks to state-listed species proposed in the EA. The CT DEEP concurred with WS' determination that the proposed action would not adversely impact populations of state-listed species.

MONITORING

The Connecticut WS program will annually review its effects on target mammal species and other species addressed in the EA to ensure those activities do not impact the viability of wildlife species. In addition, the EA 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 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 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 under Alternative 2 and when no assistance was 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 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 prepared for this proposal and the input from the public involvement process. 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 analysis in the EA adequately addresses 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 1 and applying the associated standard operating procedures. Alternative 1 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 as described in the EA.

Based on the analyses provided in the EA, there are no indications that the proposed action 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 may be 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 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.

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 Information for Planning and Conservation 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) 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 Connecticut would continue to provide effective and practical technical assistance and direct management techniques that reduce damage and threats of damage.

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

7/23/15
Date

APPENDIX A
LITERATURE CITED

USDA (U.S. Department of Agriculture). 2015. Environmental Assessment: Mammal Damage Management in the State of Connecticut. USDA, APHIS, WS, Amherst, MA.