

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**ENVIRONMENTAL ASSESSMENT: INTEGRATED WILDLIFE DAMAGE MANAGEMENT
OF COYOTES AND FERAL DOGS IN PENNSYLVANIA**

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 livestock from damage and risks associated with coyotes and feral dogs in Pennsylvania (USDA 2016). 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 26 to May 31, 2016 through a Notice of Availability (NOA) published in *The Patriot News*. 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, P.O. Box 60827, Harrisburg, PA 17106-0827.

ISSUES ASSOCIATED WITH LIVESTOCK PROTECTION 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 coyotes and feral dogs
- Effects on other wildlife species, including threatened and endangered species (T&E)
- Effects on human health and safety
- Humaneness and animal welfare concerns

AFFECTED ENVIRONMENT

Although the range and habitat used by individual species varies, coyotes and feral dogs discussed in this analysis can be found in any location within the state where suitable habitat exists for foraging and shelter. Consequently, damage or threats of damage caused by coyotes and feral dogs can occur statewide wherever they occur. However, coyote and feral dog 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 has been signed between WS and a cooperating entity.

Upon receiving a request for assistance, WDM activities could be conducted on federal, state, municipal, and private properties. Areas where damage or threats of damage could occur include, but are not limited to, agricultural fields, vineyards, orchards, farmyards, dairies, ranches, livestock operations, railroad yards, waste handling facilities, industrial sites, natural resource areas, park lands, and historic sites; state, county, and interstate highways and roads; railroads and their right-of-ways; property in or adjacent to subdivisions, businesses, and industrial parks; timberlands, croplands, and pastures; property where burrowing can cause damage to structures, dikes, ditches; public and private properties in rural/urban/suburban areas where coyotes and feral dogs can cause damage to landscaping and natural resources, property, and pose risks to human safety. The area would also include airports and military airbases where coyotes and feral dogs are a threat to human safety and to property; and public property where coyotes and feral dogs are negatively impacting historic structures and cultural landscapes.

DESCRIPTION OF THE ALTERNATIVES

The following three alternatives were developed to respond to the issues identified in Chapter 2 of the EA (USDA 2016). 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 Coyote and Feral Dog Damage Management Program (Proposed Action / No Action Alternative)

The Proposed Action/No Action alternative would continue the current implementation of an adaptive integrated approach utilizing non-lethal and lethal techniques, identified through use of the WS Decision Model, to reduce damage and threats caused by coyotes and feral dogs in Pennsylvania. Under this alternative, WS, in consultation with the Pennsylvania Game Commission (PGC) and the Pennsylvania Department of Agriculture (PDA), would continue to 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 coyotes and feral dogs, or 3) providing technical assistance and direct operational assistance to a property owner or manager experiencing damage. WS would also continue to work with the PGC, PDA, Penn State University Extension Service, and other entities to produce and distribute materials and provide educational programs on methods for preventing damage. Funding could occur through federal appropriations or from cooperative funding.

When a request for direct operational assistance is received to resolve or prevent damage caused by coyotes and feral dogs, WS conducts site visits to assess damage or threats and identifies the cause of the damage. WS applies the decision model described by Slate et al. (1992) to develop an effective site specific management strategy which minimizes risk of adverse environmental impacts and risks to human health and safety from coyote and feral dog damage management methods and is consistent with landowner/manager management objectives. Property owners or managers requesting assistance would be provided with information regarding the use of effective and practical non-lethal and lethal techniques. 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. Property owners or managers may choose to implement WS' recommendations on their own (i.e., use WS technical assistance), use contractual services of private businesses, use volunteer services of private organizations, or use the services of WS (i.e., direct operational assistance). Property owners may also take management action themselves without consulting another private or governmental agency, or take no action.

Alternative 2: Technical Assistance Only

Under this alternative, WS would only provide technical assistance to cooperators requesting assistance. WS would not provide any operational damage management. Technical assistance could include providing information, demonstrations, and recommendations on available and appropriate methods available. In some instances, wildlife-related information provided to the requestor by WS results in tolerance/acceptance of the situation. In other instances, damage management options are discussed and recommended. Only those methods legally available for use by the appropriate individual would be recommended or loaned by WS. 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 are of limited availability for use by private entities (e.g., loaning of large cage traps). Technical assistance may be provided through a personal or telephone consultation, or during an on-site visit with the requester. Under a technical assistance only alternative,

WS would recommend an integrated approach. Generally, several management strategies are described to the requester for short and long-term solutions to managing damage; these strategies are based on the level of risk, need, and the practicality of their application. WS would use the Decision Model to recommend those methods and techniques available to the requestor to manage damage and threats of damage.

This alternative would place the immediate burden of operational damage management work on the resource owner, other governmental agencies, and/or private businesses. Cooperators receiving technical assistance from WS could implement those methods recommended by WS, could employ other methods not recommended by WS, could seek assistance from other entities, or take no further action. Property owners/managers frustrated by lack of operational WS' assistance with the full range of coyote or feral dog 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 Coyote and Feral Dog Damage Management Conducted by WS

Under this alternative, WS would not be involved with any aspect of coyote or feral dog damage management. Information on coyote and feral dog damage management methods would still be available to producers and property owners through other sources such as the PGC, Penn State University Extension Service offices, or pest control organizations. Currently, the PGC only provides direct coyote and feral dog damage management assistance in limited situations, but does provide technical assistance. They also issue permits for coyote damage management activities as appropriate and allows landowners to conduct management without permits as outlined in their nuisance management guidelines (PGC 2010). Requests for information would be referred to these entities.

Persons experiencing damage caused by coyotes and feral dogs could continue to resolve damage by employing those methods legally available. All methods except for Compound 1080 would be available for use by persons experiencing damage or threats from those species. Some take may require additional permitting from the PGC or certification by the PDA to use restricted chemicals. Other restrictions may include the use of immobilizing drugs or euthanasia chemicals. Immobilizing drugs and euthanasia chemicals can only be used by WS, licensed veterinarians, or those that are trained and working under the supervision of an appropriate DEA license holder.

CONSISTENCY

Wildlife damage management activities are consistent with work plans, MOU's, and policies of WS, the PGC, the PDA, and the US Fish and Wildlife Service (USFWS). WS consulted with the PGC regarding potential impacts to wildlife from the proposed action in the EA. The PGC provided no concerns regarding WS' determination that the proposed action would not adversely impact populations of state-listed species.

MONITORING

The WS program will annually review its effects on target 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 target wildlife by WS would not have significant impacts on statewide 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 coyotes and feral dogs 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) wildlife 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 issue of humaneness when all facets of that issue 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. Wildlife damage management, as conducted by WS, 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 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 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 has determined that the proposed program would not affect any federally listed T&E species currently listed in the state. In addition, WS has determined that the proposed activities would not adversely affect state-listed T&E species.
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) wildlife 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.


 Janet Bucknall, Director-Eastern Region
 USDA/APHIS/WS
 Raleigh, North Carolina


 Date

APPENDIX A
LITERATURE CITED

Slate, D. A., R. Owens, G. Connolly, and G. Simmons. 1992. Decision making for wildlife damage management. Transactions of the North American Wildlife and Natural Resources Conference 57:51-62.

USDA (U.S. Department of Agriculture). 2016. Environmental Assessment: Integrated Wildlife Damage Management of Coyotes and Feral Dogs in Pennsylvania. USDA, APHIS, WS, Harrisburg, PA.