



United States  
Department of  
Agriculture

Animal and Plant  
Health Inspection  
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Wildlife  
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**DECISION  
and  
FINDING OF NO SIGNIFICANT IMPACT  
for  
BIRD DAMAGE MANAGEMENT IN THE IDAHO  
WILDLIFE SERVICES PROGRAM**

**INTRODUCTION**

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program, prepared an Environmental Assessment (EA) in 1998 which addressed the need to conduct Bird Damage Management (BDM) and analyzed potential impacts of various alternatives for responding to bird damage problems in Idaho. The EA analyzed bird damage management for: 1) the protection of agricultural and natural resources, aquaculture and property, 2) public health and safety, and 3) bird caused nuisances.

A Decision and Finding of No Significant Impact (FONSI) were issued on December 18, 1998. The Decision selected Alternative 1 (the Proposed Action), which was to Continue the Current Federal BDM Program. A Monitoring Report was completed on March 27, 2000 which analyzed data from Fiscal Year (FY) 98 (Oct. 1, 1997-Sept. 30, 1998) and FY99 (Oct. 1, 1998-Sept. 30, 1999). The FY 1998-1999 Monitoring Report concluded that a revision of the EA was not necessary and that the 1998 Decision remained valid since the affected environment and impacts remained essentially unchanged from the analyses in the EA.

In March 2002, a Monitoring Report (FY00 and 01) to the 1998 Bird EA was completed. The purpose of the Monitoring Report was to: 1) review data relevant to FY00 (Oct. 1, 1999-Sept. 30, 2000) and FY01 (Oct. 1, 2000-Sept. 30, 2001) BDM activities in Idaho, 2) provide rationale for potential use of laser lights, a new nonlethal method, and to provide more detailed description of methyl anthranilate, a nonlethal repellent, 3) determine if the Decision and FONSI made in conjunction with the 1998 EA were still appropriate, and, 4) take appropriate action if the affected environment or impacts have significantly changed from the analyses in the 1998 EA. The result of the draft FY 2000 and 2001 Monitoring Report determined that the total number of ring-billed and California gulls, and American robins removed by WS exceeded the number analyzed in the 1998 EA. An Amendment to the 1998 EA was prepared to further assess the effects of WS' BDM activities to ring-billed and California gulls, and American robin populations and to consider the potential use of methyl anthranilate and laser lights. The FY 2000 and 2001 Monitoring Report and the Amendment were combined into one document, the FY 2000-2001 Monitoring Report and Amendment, which was released to the public on March 21, 2002. A "Notice of Availability" was published for 3 consecutive days, starting March 21, 2002 in the legal notice sections of The Idaho Statesman, Boise; The Times News, Twin Falls; Idaho State Journal, Pocatello; Post Register, Idaho Falls; Lewiston Tribune, Lewiston; and Coeur d' Alene Press, Coeur d' Alene. The Notice of Availability stated that WS was accepting public comments for a 30-day period and copies of the 1998 EA, the most current Monitoring Report, and the Amendment could be obtained from the USDA-APHIS-WS State Office in Boise. The WS State Office mailing address and phone number were provided. Additionally, copies of the FY 2000-2001 Monitoring Report and Amendment and an invitation to provide comments were mailed to 5 individuals and organizations who had previously expressed an interest in the WS program.

As a result of the Notice of Availability, WS received one request from the public for a copy of the 1998 EA and the FY 2000-2001 Monitoring Report and Amendment. Copies were mailed March 22, 2002, the same day these documents were requested.

WS did not receive any written comments during the 30-day public comment period, nor has the program received any comments up to and including the signing date of this Decision and FONSI.



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Copies of the 1998 EA, the 1998 Decision and FONSI, the FY 1998-1999 Monitoring Report, and the FY 2000-2001 Monitoring Report and Amendment are available from the Idaho WS State Office, USDA, APHIS, 9134 W. Blackeagle Drive, Boise, Idaho, 83709-1572.

## MAJOR ISSUES

Cooperating agencies helped identify a variety of issues relevant to the scope of the 1998 EA. These issues were grouped into the following 5 primary issues considered in detail:

- Cumulative effects of WS BDM on target bird species populations.
- Effects of WS BDM on nontarget species populations, including Threatened and Endangered (T/E) species.
- Risks posed by WS BDM methods to the public and domestic pets.
- Efficacy and selectivity of BDM methods.
- Cost-effectiveness of BDM methods.

## ALTERNATIVES ANALYZED IN DETAIL

Four alternatives were developed and analyzed in relation to the issues identified above. Three additional alternatives were considered but not analyzed in detail. A detailed discussion of the anticipated effects of the alternatives on the issues is described in Chapter 4 of the 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 requirement (40 CFR 1502) of the National Environmental Policy Act and is a viable and reasonable alternative that could be selected. It also serves as a baseline for comparison with the other alternatives. The No Action/Proposed Action is to continue the current Idaho WS BDM program for the protection of agricultural and natural resources, aquaculture, property; public health and safety; and bird nuisances. WS would respond to all requests for assistance with, at a minimum, technical assistance, or, where appropriate and when cooperative funding is available, direct operational assistance, whereby WS personnel conduct damage management actions. An integrated wildlife damage management approach would be implemented allowing for use of all lethal methods, either singly or in combination, to meet the requester needs for reducing or stopping damage or other related problems. Alternative 1 results in only low levels of impact on bird populations, presents very low risks to the public, T/E and nontarget species, and is cost-effective. Methods used are selective and effective.

**Alternative 2. Nonlethal Damage Management Required Before Lethal.** This alternative would not allow for the use of lethal methods by WS until nonlethal methods have been used in a given damage situation and found to be ineffective or inadequate. No preventive lethal damage management would be allowed. Alternative 2 may result in the removal of fewer target individuals than in Alternative 1, however, levels of damage caused by birds and risks of illegal toxicant use by non-WS entities would probably be higher. Risks to the public and domestic pets from WS methods would probably be the same as Alternative 1 once the "nonlethal before lethal requirement" is met. Selectivity of methods used would be similar to Alternative 1, however, costs to conduct BDM would increase because of the additional time WS would have to invest to conduct, supervise, and/or monitor nonlethal damage management methods and results.

**Alternative 3. Technical Assistance Only.** Alternative 3 would not allow for WS direct operational BDM in Idaho. WS would only provide technical assistance and make recommendations when requested. Agricultural producers, property owners, agency personnel, or others could conduct BDM using legally available lethal or nonlethal methods. DRC-1339 and alpha-chloralose would not be available for use by the public or government agencies. Bird damage would likely increase, particularly starling and blackbird damage at feedlots, without the option of using DRC-1339. Agricultural producers inability to legally and effectively reduce bird damage could lead some producers to consider use of toxicants which are not currently registered for BDM or as selective as DRC-1339. This could potentially result in increased risks and impacts to nontargets, including T/E species, and to the public and pets. Costs to WS would probably be lower than the Proposed Action because the number of WS personnel needed to conduct BDM would be reduced to only those needed to provide technical assistance.



**Alternative 4. No Federal WS BDM.** This alternative would eliminate WS' involvement in BDM in Idaho. WS would not provide direct operational or technical assistance and people who might otherwise request assistance from WS would have to conduct their own BDM without WS input or recommendations. Information on BDM methods development might still be available to producers and property owners from sources other than WS. DRC-1339 and alpha-chloralose would not be available for use by the public or government agencies. Bird damage would likely increase, particularly starling and blackbird damage at feedlots and dairies, without the option of using DRC-1339. WS would not have any impact on target, nontarget or T/E species populations. It is possible that frustration from the public caused by the inability to effectively reduce bird losses could lead to illegal use of toxicants, increasing risks to T/E species, nontarget wildlife, pets, and the public and decreasing selectivity for target birds.

### FINDING OF NO SIGNIFICANT IMPACT

Based on a review of information available since the completion of an earlier EA (USDA 1998) and the analysis provided in the FY 2000-2001 Monitoring Report and Amendment, there continue to be no indications that WS BDM is having a significant impact, individually or cumulatively, on the quality of the human environment. 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 Idaho, is not regional or national in scope.
2. WS BDM activities pose minimal risk to public health and safety. No injuries to any member of the public are known to have resulted from these activities in the analysis areas.
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.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to the use of avicides, this action is not highly controversial in terms of size, nature, or quantity applied, or effect.
5. Based on the analysis documented in the 1998 EA, the FY 1998-1999 Monitoring Report, the FY 2000-2001 Monitoring Report and Amendment, and the accompanying administrative files, the effects of BDM activities on the human environment would not be significant. The effects of these activities are not highly uncertain and do not involve unique or unknown risks.
6. These activities do not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through the EA or through his review. The number of birds taken by WS annually or the anticipated number of birds taken would not adversely impact the viability of any species' populations.
8. None of the BDM activities would 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. An informal Section 7 consultation with the US Fish and Wildlife Service confirmed that the BDM activities carried out by WS would not likely adversely affect any T/E species.
10. All BDM activities are carried out in compliance with Federal, State, and local laws imposed for the protection of the environment.

## DECISION

Based on the above monitoring information and the FY 2000-2001 Monitoring Report and Amendment to the 1998 BDM EA, it is my determination that continuation of WS BDM activities under the alternative selected in the December 16, 1998 Decision is still appropriate. The selected alternative is to continue the current Federal BDM program. The analysis of impacts as discussed in the 1998 EA and in the FY 2000-2001 Monitoring Report and Amendment would pose a low magnitude of impact to the overall population. Additionally, the selected alternative would provide the greatest effectiveness and selectivity of methods available, the best cost-effectiveness, and has a low level of risk to the public, pets, nontarget species including T/E species, and the environment. WS will continue to use the currently authorized BDM methods in compliance with applicable mitigation measures in Idaho where WS has been requested to provide assistance since the completion of the *Bird Damage Management in the Idaho Wildlife Services Program* EA. For additional information or questions regarding this FONSI or Decision, please contact George Graves, State Office, USDA, APHIS, WS, 9134 West Blackeagle Drive, Boise, ID 83709-1572, telephone (208) 378-5077.

  
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Mark Collinge, State Director  
APHIS, Wildlife Services, Idaho

1-24-03  
Date

## Literature Cited

USDA (United States Department of Agriculture). 1998. Environmental assessment, bird damage management in the Idaho wildlife services program. United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, Boise, USA.