



**FINDING OF NO SIGNIFICANT IMPACT
and
DECISION
for
*Rodent Damage Management in Idaho***

United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Animal and
Plant Health
Inspection
Service

Wildlife
Services

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Introduction

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program responds to a variety of requests for assistance from individuals, organizations and agencies experiencing damage and other related problems caused by wildlife. WS is the Federal program authorized by Congress and directed by law to reduce damage caused by wildlife (Animal Damage Control Act of March 2, 1931, as amended, 46 Stat. 1468; 7 U.S.C. 426-426c), and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, as amended (Public Law 100-202, Stat. 1329-1331). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992).

This Environmental Assessment (EA) documents the analysis of the potential environmental and social effects of WS' proposed beaver (*Castor canadensis*), muskrat (*Ondatra zibethicus*), jackrabbit (*Lepus* spp.), marmot (*Marmota* spp.), ground squirrel (*Ammospermophilus leucurus*, *Spermophilus mollis idahoensis*, *S. m. mollis*, *S. m. artemisiae*, *S. armatus*, *S. columbianus*, *S. elegans* and *S. beldingi*), porcupine (*Erethizon dorsatum*), pocket gopher (*Thomomys* spp.), vole (*Microtus*, *Clethrionomys*, *Phenacomys* and *Lemmys* spp.), deer mouse (*Peromyscus* spp.) and field mouse damage management program (hereafter referred to as rodent damage management) to protect human health and safety, agricultural and natural resources, and property on private and public lands in Idaho. WS generally uses an Integrated Wildlife Damage Management approach in which a combination of methods may be used or recommended to reduce damage. Resource management agencies and individuals are required to request WS activities, and all Idaho WS rodent damage management is in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973 (letters of concurrence from the U. S. Fish and Wildlife Service (USFWS), April 13, 2004; and the National Oceanic and Atmospheric Administration (NOAA Fisheries), April 22, 2004).

Idaho WS rodent damage management is implemented based on application of the WS Decision Model (Slate et al. 1992, USDA 1994, WS Directive 2.201). Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual rodent damage management actions are categorically excluded and do not require an EA (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). However, to evaluate and determine if there might be any potentially significant impacts to the quality of the human environment from WS' planned and proposed rodent damage management program an EA was prepared. The pre-decisional EA was released by WS in July 2003 for a 30-day public comment period. The pre-decisional EA documents the need for rodent damage management in Idaho and assessed potential impacts of various Alternatives in responding to rodent damage and other related problems. WS' proposed action is to continue the current Idaho WS rodent damage management program on all land classes in Idaho when requested.



United States Department of Agriculture
Animal and Plant Health Inspection Service

Safeguarding American Agriculture

Scope of the EA

Rodents can have a negative economic impact and threaten public health and safety in Idaho. Beaver cut and girdle trees, and their dam building can cause flooding on forest and farm land; they plug culverts, and roads and railroad beds can wash-out (Miller 1983, DeAlmeida 1987). Muskrats, marmots, ground squirrels and pocket gophers can burrow into dikes and embankments causing them to weaken, and jackrabbits and field rodents feed on crops causing economic losses. Wywialowski (1994) reported that 19% of field crop producers, 20% of vegetable, fruit, or nut producers, and 19% of farmers or ranchers who store commodities (whole grain, feed or seed) cited damage from rodents and rabbits. Ground squirrels, woodchucks and gophers were reported by vegetable, fruit or nut producers as the primary species causing damage (Wywialowski 1994). Of 49 State wildlife agencies that responded to a survey conducted by Conover and Decker (1991), 94% and 79% reported that beaver and muskrats, respectively, were causing problems in their State.

The scope and purpose of the EA is to evaluate the potential impacts from WS rodent damage management to protect agricultural and natural resources, property, and public health and safety in Idaho. Damage problems can occur throughout the State, resulting in requests for WS assistance. Under the Proposed Alternative, rodent damage management could be conducted on private, Federal, State, Tribal, county, and municipal lands in Idaho. Idaho encompasses about 53.5 million acres, and during Federal Fiscal Year (FY) 02, WS had 291 *Agreements for Control* to conduct rodent damage management on 452,483 acres. However, Idaho WS generally only conducts rodent damage management on a small portion of the properties under Agreement in any one year. In FY02, 219 rodent damage management actions were conducted on properties containing an area of about 46,673 acres or about 10% of the area under Agreement and about 0.09% of the land area of Idaho (MIS 2002).

Consistency

No rodent damage management is conducted by WS on U.S. Forest Service (Forest Service) or Bureau of Land Management (BLM) administered lands without first ensuring that the activity would be consistent with land management and/or resource management plans. In the Forest Service, these management plans are termed Land and Resource Management Plans (LRMPs) or more commonly "*Forest Plans*," and on BLM lands, the equivalent documents are called Resource Management Plans (RMPs) or in some older documents, Management Framework Plans (MFPs). If the proposed rodent damage management activity is consistent with LRMPs, RMPs or MFPs, then no further action would be necessary.

If a program is inconsistent with LRMPs, RMPs or MFPs, the land management agency could amend their plans to be consistent with this EA, or the planned rodent damage management activity could be modified. The program would not be implemented on Federal lands until all inconsistencies are resolved either through amendment of the plans or modification of the activity.

Monitoring

The Idaho WS program will annually provide to the Idaho Department of Fish and Game (IDFG) a list of target and non-target animals killed by WS to help ensure that the total Statewide take (WS and other known harvest/mortality) does not impact the viability of any wildlife species found in Idaho as determined by the IDFG. Currently available rodent harvest/mortality data and population information used for evaluation suggest that current populations are healthy and stable to increasing.

Interdisciplinary Approach and Public Involvement

Issues related to the Proposed Alternative were developed after soliciting input from 1) 19 offices of Federal natural resources agencies and other Federal agencies having regulatory responsibilities (i.e., USFWS, BLM, Forest Service, U.S. Army Corps of Engineers, Bureau of Reclamation, U.S. Department of Transportation, Natural Resource Conservation Service and Craters of the Moon National Monument), 2) 15 offices of State agencies (i.e., Idaho State Department of Agriculture, IDFG, Idaho Department of Health and Welfare, Idaho Department of Environmental Quality, Idaho Department of Lands (IDL), Idaho Transportation Department, Idaho Department Parks and Recreation, Idaho Department of Water Resources and Idaho Bureau of Hazardous Materials), and 3) 5 American Indian Tribes (i.e., Nez Perce, Shoshone-Bannock, Shoshone-Paiute, Coeur d' Alene and Kootenai Tribe of Idaho). As part of a review and comment process, and as required by the Council on Environmental Quality (CEQ 1981) and APHIS NEPA Implementing Regulations, a pre-decisional EA was made available to the public through a "Notice of Availability" (NOA) that was published for 3 consecutive days in local newspapers and through direct mailings of NOAs to interested parties. The NOA was published in the legal notice section of The Post Register, Idaho Falls; The Idaho Statesman, Boise; Lewiston Morning Tribune, Lewiston; Coeur d' Alene Press, Coeur d' Alene; Time-News, Twin Falls; and The Idaho State Journal, Pocatello. The NOA provided a 30-day comment period for the public to identify any concerns or new issues. In addition, copies of the EA were mailed to 53 different natural resources and agricultural organizations and Federal and State government agencies having interest in rodent damage management or WS issues. WS received 2 comment letters during the 30-day comment period. Those letters were from the USFWS and the Federal Highway Administration (FHA) requesting that their respective agencies be deleted from the EA title page listing cooperating agencies. No other comment letters were received, nor were any new issues or Alternatives raised during or after public review of the EA. The 2 comment letters are maintained in an administrative file located at the Idaho WS State Office, 9134 W. Blackeagle Drive, Boise, ID 83709-1572.

Major Issues

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

- Concerns about the cumulative effects of WS rodent damage management on target rodent populations.
- Concerns about the effects of WS rodent damage management on non-target species populations, including T/E species.
- Concerns about the risks posed by WS rodent damage management methods to the public and domestic pets.
- Concerns about the efficacy and selectivity of rodent damage management methods.
- Effects of beaver dam breaching on wetland wildlife habitat areas.

Alternatives Analyzed in Detail

Five potential Alternatives were developed to address 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.

- **Alternative 1** - Continue the Current Idaho WS Rodent Damage Management Program: (No Action/Proposed Alternative).

The No Action Alternative (Proposed Alternative) would continue the current Idaho WS rodent damage management program primarily for the protection of agricultural resources and property, but also to safeguard public health and safety. The current program is a collection of cooperative programs with private individuals, associations and governmental agencies. Idaho WS conducts technical assistance and operational preventive rodent damage management (as indicated by potential threats to aviation resulting from the presence of rodents or lagomorphs or disease threats to humans, animals or wildlife) and corrective rodent damage management (in response to current loss) under Cooperative Agreements and Agreements for Control. All damage management is based on interagency relationships, which require close coordination and cooperation because of overlapping authorities and responsibilities. Idaho WS has Memoranda of Understanding with the BLM, Forest Service, IDL and IDFG (through the State Animal Damage Control Board) and Cooperative Agreements with Federal, State, county, and city governments, and individuals to conduct rodent damage management.

Before rodent damage management would be conducted on private lands, *Agreements for Control on Private Property* are signed with the landowner or manager that describe the methods to be used and the species to be managed. For Federal, State, county, city and Tribal lands, Idaho WS would coordinate damage management with the appropriate land management agency. Damage management would be directed toward localized populations or groups and/or individual animals, depending on the circumstances.

- **Alternative 2** - Continue the Current Rodent Damage Management Program, but Non-lethal Required Before Lethal Control.

This Alternative is similar to Alternative 1, however, it would not allow for the use of lethal methods by WS until non-lethal methods have been employed in a given damage situation and found to be ineffective or inadequate. No preventive lethal damage management would be allowed.

- **Alternative 3** - Continue the Current Rodent Damage Management Program, but Without the use of Rodenticides or Other Chemicals.

This Alternative would preclude WS' use of aluminum and zinc phosphide, gas cartridges and other rodenticides, chemical repellents, euthanasia and immobilization drugs, and binary explosives used to breach beaver dams. Other damage management methods would be allowed as long as they were not a rodenticide or chemical in nature.

- **Alternative 4 - Idaho WS Technical Assistance Rodent Damage Management Program Only.**

This Alternative would eliminate WS operational rodent damage management in Idaho. Idaho WS personnel would only provide technical assistance and make recommendations when requested. However, private landowners, contractors or others could conduct their own damage management on Federal, State, county, city, Tribal and private lands.

The "*technical assistance only*" Alternative would place the immediate burden of operational damage management work on other Federal, State, county, and city agencies and Tribal and private property owners. Individuals experiencing rodent damage would, independently or with Idaho WS recommendations, carry out and fund damage management activities. Individuals or agencies could implement damage management as part of the cost of doing business or assume a more active role in providing operational damage management. If this Alternative were selected, Idaho WS could not direct how Federal, State, county, or city agencies or property owners would implement rodent damage management. Some agencies or property owners may choose not to take action to resolve damage while other situations may warrant the use of legally available management methods because of public demands.

- **Alternative 5 - No Idaho WS Rodent Damage Management Program.**

This Alternative would eliminate all WS rodent damage management (operational and technical assistance) in Idaho. However, rodent damage management activities would continue to be conducted in Idaho because of the need for this type of expertise and service. Federal, State, county, city and Tribal governments, State and/or county agricultural organizations, private pest control operators and contractors, the public and possibly other entities, would have to fill the void left by the elimination of WS rodent damage management services. Idaho WS would not be available to provide technical assistance or make recommendations to these groups or organizations.

Alternatives Considered but not Analyzed in Detail, with Rationale

Compensation for Rodent Damage Losses would require the establishment of a system to reimburse resource owners for damages. Under such an Alternative, WS would not provide any operational damage management or technical assistance. Aside from lack of legal authority, analysis of this Alternative in USDA (1994) indicates that the concept has many drawbacks such as: 1) it would require larger expenditures of money and manpower to investigate and validate all losses, and to determine and administer appropriate compensation, 2) it would be difficult, if not impossible, to assess and confirm losses in a timely manner for all requests, and, therefore, many losses could not be verified and would go uncompensated, 3) compensation would give little incentive to resource owners to limit damage by implementing rodent damage management strategies and methods, 4) not all resource owners would rely completely on a compensation program and rodent damage management activities including lethal damage management would likely continue as permitted by State law, 5) compensation would not be practical for public health and safety problems, and 6) full market value of the damaged resource would not likely be compensated.

Bounties are payment of funds for killing rodents suspected of causing economic losses and have not been supported by most wildlife professionals for many years (Latham 1960). WS concurs with these agencies and wildlife professionals because of several inherent drawbacks and inadequacies in the payment of bounties, including: 1) bounties are generally ineffective at controlling damage, especially over a wide area such as Idaho, 2) circumstances surrounding the take of animals are typically arbitrary and completely unregulated, 3) it is difficult or impossible to assure that the animals claimed for bounty were taken from the damage management area, and 4) WS does not have the authority to establish a bounty program.

Eradication and Long Term Population Suppression would direct all WS Program efforts toward total long term elimination of select rodents in entire areas in Idaho. The eradication of rodents is not a desired goal of State agencies, although these species may be taken by the general public in areas where they are causing damage. Eradication as a general objective for rodent damage management will not be considered by WS in detail because: 1) WS opposes eradication of any native wildlife species, 2) IDFG and ISDA oppose eradication of any native Idaho wildlife species, 3) the eradication of a native species or local population would be extremely difficult, if not impossible to accomplish, and cost-prohibitive in most situations, and 4) eradication is not acceptable to most members of the public.

Suppression would direct Idaho WS efforts toward managed reduction of certain problem populations or groups. When a large number of requests for rodent damage management are generated from a localized area, WS would consider suppression of the local population or groups of the offending species, if appropriate. However, it is not realistic, practical or allowable under present WS policy to consider large-scale population suppression as the basis of the WS Program. Typically, WS activities in Idaho are conducted on a small portion of the area inhabited by rodents, and on a very small Statewide area (<0.1%, see Section 1.1 of the EA).

Finding of No Significant Impact

The analysis in the EA indicates that there would 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 preparation of an Environmental Impact Statement is not necessary. This determination is based on the following factors:

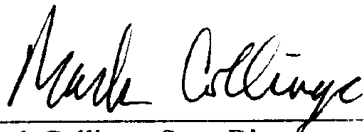
1. Rodent damage management, as conducted by WS in Idaho, is not regional or national in scope.
2. The Proposed Action would pose minimal risk to public health and safety. No injuries to any member of the public are known to have resulted from WS rodent damage management activities in Idaho.
3. There 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 human environment are not highly controversial. Although there is some public opposition to some rodent damage management methods, this action is not highly controversial in terms of size, nature, quantity applied, or effect.
5. Based on the analysis documented in the EA, the effects of the Proposed Action on the human environment would not be significant. The effects of the Proposed Action 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 this assessment. The number of rodents taken by WS annually or the anticipated number of rodents taken would not adversely impact overall population levels.
8. The Proposed Action would not affect or cause any loss or destruction of significant cultural or historical resources or sites.
9. An informal Section 7 consultation with the USFWS and NOAA Fisheries confirmed that the Proposed Action would not likely adversely affect any T/E species. The Idaho Division of Environmental Quality also concurred that the Proposed Actions would not likely have any significant adverse effects on the environment.
10. The Proposed Action would be in compliance with all Federal, State, and local laws and regulations imposed for the protection of the environment.

Decision and Rationale

I have carefully reviewed the EA and the input resulting from the public involvement process. I believe the issues identified in the EA would be best addressed through implementation of Alternative 1 (*i.e.*, Continue the Current Idaho WS Rodent Damage Management Program) and applying the associated mitigation and monitoring measures discussed in Chapter 3 of the EA. Alternative 1 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, non-target species, T/E species and the environment, and provides for cooperative relationships between WS and other wildlife management and natural resource agencies/entities. WS will continue to use all currently authorized rodent damage management methods in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA. Although USFWS and FHA were consulted in the development of the EA, those agencies names have been removed as "cooperating agencies" in the final EA, as requested by those agencies. However, the analysis and all other aspects of the pre-decisional EA remain the same in the final EA on "*Rodent Damage Management in Idaho*".

For additional information regarding this decision, please contact George E. Graves, APHIS, WS, 9134 Blackeagle Dr., Boise, ID 83709, e-mail: george.e.graves@aphis.usda.gov, or telephone (208) 378-5077.



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4-28-04

Date

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