

DECISION AND FINDING OF NO SIGNIFICANT IMPACT

Environmental Assessment: Bird Damage Management in the State of Illinois

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 reducing bird damage to agricultural resources, natural resources, property, livestock, and public health and safety in Illinois (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 7, 2015 to May 7, 2015. The document was made available through a Notice of Availability (NOA) published in the *State Journal Register* and sent to interested parties through the APHIS Stakeholder Registry. WS also published the document on the program website. No comments were received. All correspondence on the EA is maintained at the WS State Office, 3430 Constitution Drive, Suite 121, Springfield, IL 62711.

ISSUES ASSOCIATED WITH BIRD DAMAGE MANAGEMENT ACTIVITIES

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

- Issue 1 - Effects on target bird populations
- Issue 2 - Effects on non-target species, including threatened and endangered (T&E) species
- Issue 3 - Effects on human health and safety
- Issue 4 - Effects on the aesthetic value of birds

AFFECTED ENVIRONMENT

Bird damage or threats of damage can occur statewide in Illinois wherever those bird species occur. However, bird 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 in Illinois. Requests for assistance to resolve bird damage generally occur in areas in and around commercial, industrial, public, and private buildings, facilities and properties, and at other sites where birds may roost, loaf, feed, nest, or otherwise occur. Areas where bird damage management activities could be conducted include, but are not limited to, residential buildings, golf courses, athletic fields, recreational areas, swimming beaches, parks, hatcheries or nurseries, corporate complexes, subdivisions, businesses, industrial parks, schools, wetlands, restoration sites, cemeteries, public parks, bridges, industrial sites, urban/suburban woodlots, reservoirs and reservoir shore lands; nuclear, hydro and fossil power plant sites; substations, transmission line rights-of-way, landfills, military bases, or at any other sites where birds may roost, loaf, feed, or nest. Damage management activities could also be conducted at agricultural fields, vineyards, orchards, farmyards, dairies, ranches, livestock operations, grain mills, and grain handling areas (e.g., railroad yards) where birds destroy crops, feed on spilled

grains, or contaminate food products for human or livestock consumption. Additionally, activities could be conducted at airports and surrounding properties where birds represent a threat to aviation safety.

DESCRIPTION OF THE ALTERNATIVES

The following three alternatives were developed to respond to the issues identified in Chapter 2 of the EA. A detailed discussion of the effects of the alternatives on the issues is described in the EA under Chapter 4 (USDA 2015); below is a summary of the alternatives.

Alternative 1 - Continue the Current Integrated Approach to Managing Bird Damage (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 birds in Illinois. A major goal of the program would be to resolve and prevent bird damage and to reduce threats to human safety. To meet this goal, WS, in consultation with the United States Fish and Wildlife Service (USFWS) and the Illinois Department of Natural Resources (IDNR), 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 birds would integrate the use of the most practical and effective methods to resolve a request for damage management as determined by site-specific evaluations. 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. The USFWS could continue to issue depredation permits to WS and to those entities experiencing bird damage when requested by the entity and when deemed appropriate by the USFWS for those species that require a permit.

Under this alternative, WS could 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 birds, or 3) providing technical assistance and direct operational assistance to a property owner or manager experiencing damage.

The most effective approach to resolving wildlife damage is to integrate the use of several methods simultaneously or sequentially. The philosophy behind integrated wildlife damage management is to implement the best combination of effective management methods in a cost-effective manner while minimizing the potentially harmful effects on humans, target and non-target species, and the environment. Integrated damage management may incorporate cultural practices (e.g., animal husbandry), habitat modification (e.g., exclusion, vegetation management), animal behavior modification (e.g., scaring, repellents), removal of individual offending animals (e.g., trapping, shooting, and avicides), local population reduction, or any combination of these, depending on the circumstances of the specific damage problem.

Alternative 2 - Bird Damage Management by WS using only Non-lethal Methods

Under this alternative, WS would be restricted to only using or recommending non-lethal methods to resolve damage caused by birds in Illinois. Lethal methods could continue to be used under this alternative by those persons experiencing damage 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 state, local animal control agencies, or private businesses or organizations. Property owners or managers may 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 (non-lethal or lethal) from a private or public entity other than WS.

Alternative 3 – No Bird Damage Management Conducted by WS

This alternative precludes any activities by WS to reduce threats to human health and safety, and alleviate damage to agricultural resources, property, and natural resources. WS would not be involved with any aspect of bird damage management. All requests for assistance received by WS to resolve damage caused by birds would be referred to the USFWS, the IDNR, and/or private entities. This alternative would not deny other federal, state, and/or local agencies, including private entities, from conducting damage management activities directed at alleviating damage and threats associated with birds.

CONSISTENCY

Wildlife damage management activities conducted in Illinois are consistent with work plans, MOU's, and policies of WS, the IDNR, and the USFWS. WS reviewed the list of T&E species in Illinois as determined by the USFWS, the National Marine Fisheries Services, and the IDNR. Based on that review during the development of the EA, WS determined that activities conducted pursuant to the proposed action would have no effect on federally or state listed T&E species.

MONITORING

The Illinois WS program will annually review its effects on target bird 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 birds by WS would not have significant impacts on statewide bird populations when known sources of mortality were considered. No risk to public safety were identified 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 when no assistance is 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 birds 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 analysis 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) bird 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 (Alternative 1) as described in the EA.

Based on the analysis provided in the EA, there are no indications that the proposed action (Alternative 1) 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. Bird 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 analysis 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 is some opposition to bird 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 within the State of Illinois.
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 adversely 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 species of concern.
10. The proposed action would comply with all applicable federal, state, and local laws.
11. No significant cumulative effects were identified by this assessment or other actions implemented or planned within the area.

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) bird 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 Illinois would continue to provide effective and practical technical assistance and direct management techniques that reduce damage and threats of damage.



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7/29/15
Date

APPENDIX A
LITERATURE CITED

USDA (United States Department of Agriculture). 2015. Environmental Assessment: Bird Damage Management in the State of Illinois. USDA APHIS WS, Springfield, IL.