APPENDIX A

Summary of Public Comments and Responses

Based on our request for public comments on the draft Environmental Assessment (EA), we received 13 comments from various international and state agencies, organizations, and private individuals. Nine of these were fully supportive of APHIS-WS' Oral Rabies Vaccination (ORV) programs and the proposed field trial and two were supportive of the program, but had concerns or suggested corrections to the EA, as described below. Two of the comments submitted were opposed to APHIS-WS's proposal; one suggested that APHIS-WS had not properly informed the public of the intended field trial and the other thought the field trial was a waste of money. Three of the comments brought up issues that required a response. The comments and APHIS-WS' responses to those comments are below.

Comment 1

Unintentional human exposure will occur, especially when the product is used in high density population hand baiting areas. Twenty percent of calls from individuals to the toll free number printed on the packets, reported human contact with open packets. And the number of calls from areas with high hand baiting was significantly higher than those from predominately air baited areas. At a minimum, a system to appropriately identify, advise, diagnose, and provide appropriate medical care for individuals with significant exposure (open wounds, bites, mucous membranes) to the vaccine should be put in place.

Response 1

APHIS-WS will undertake several measures to mitigate potential bait/vaccine exposures. All ORV programs, including this field trial, are widely advertised and public outreach is employed to inform the affected public of measures to take in the event that they find a bait (i.e. don't touch the bait or move it; if bait must be moved, pick it up with a shovel, etc.; do not remove a bait from a pet's mouth). The ORV baits are labeled with a toll-free number to call for further information or guidance if a bait is found. Aerial distribution of baits will occur in rural areas only. In urban and more developed areas, baits will be distributed by hand by WS personnel. These measures further reduce the potential of baits being placed in areas frequented by humans and pets.

APHIS-WS recognizes the need for an established protocol to triage callers in the event of a vaccine exposure or unlikely adverse health event. APHIS-WS has established a Field Trial Oversight Committee to oversee the development of this EA and to address potential concerns regarding the AdRG1.3 field trial, including those outlined in this comment. The committee consists of officials from APHIS-WS, Veterinary Services-Center for Veterinary Biologics, Ontario Ministry of Natural Resources (OMNR), Quebec Ministry of Natural Resources and Wildlife (QMNR), and the Centers for Disease Control and Prevention (CDC). Both the OMNR and QMNR were able to provide expertise and experience with the use of the AdRG1.3 rabies vaccine in field trials in their respective Provinces (there have been no reports of adverse events resulting from these field trials). APHIS-WS and the CDC have worked closely to establish a response protocol and develop a SOP flow chart to assist Health agency personnel in assessing the potential risk to callers who report contacting a bait. Additionally, this SOP for bait contacts also includes guidance for working with the CDC and following up with callers at specified intervals depending on the risk level.

Comment 2

The National Park Service (NPS) should be added to the list of cooperators in Section 1.9 of the EA. Additionally, the commenter requested that Section 1.9.2 of the EA be corrected to reflect the fact that even though states exercise their authorities under state law to propose or approve the distribution of ORV baits onto lands owned by other entities, the ultimate authority with jurisdiction over distribution of ORV baits on NPS lands is NPS.

Response 2

Regarding the first suggestion to add NPS to the list of cooperators in Section 1.9, APHIS-WS has decided not to change the current wording in the EA. Section 1.9 reads: "*The APHIS-WS National Rabies Management Program (NRMP) cooperates and coordinates closely with the United States Forest Service (USFS) and the Bureau of Land Management (BLM). Additionally, the APHIS-WS NRMP consults with the United States Fish and Wildlife Service (USFWS), the Tennessee Valley Authority (TVA), the United States Army Corps of Engineers (USACE), the United States Coast Guard (USCG), the Department of Defense (DoD), the National Aeronautics and Space Administration (NASA), the Federal Bureau of Investigation (FBI), the Bureau of Indian Affairs (BIA), and other agencies when necessary and as appropriate. Finally, the NRMP cooperates closely with state agencies such as the State Health and Wildlife Departments.*" APHIS-WS has a specific Memorandum of Agreement with both the USFS and BLM and, therefore, these agencies are official cooperators regarding several APHIS-WS programs. A similar Memorandum of Agreement is not in place with the NPS and NPS lands are not specifically analyzed in this EA as the field trial does not occur on NPS land. However, APHIS-WS does work closely with NPS and, in fact, has several separate EAs in place with NPS for ORV activities that occur on NPS units. Regarding the commenter's second suggestion, APHIS-WS will make the requested change to the language of the EA to improve its clarity. APHIS-WS agrees that a State cannot make the decision to distribute ORV baits on NPS lands without NPS approval.

Comment 3

Commenter suggested that APHIS-WS had not properly informed the residents of West Virginia of the proposed field trial. This commenter also thought that the comment period should be extended to allow time for the public to submit comments.

Response 3

APHIS-WS and State and local officials have been conducting outreach activities, which have included meetings, televised information sessions, and one-on-one contact with area residents since 2010.

A Notice of Availability was published in the *Federal Register,* (Docket No. APHIS-2011-0089) on August 8, 2011, that informed the public of the availability of the draft EA and allowed for a 30-day comment period. The commenter provided no justification why the comment period should be extended so this suggestion was not considered further.