DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT

WILDLIFE DAMAGE MANAGEMENT AT BALTIMORE/WASHINGTON INTERNATIONAL AIRPORT MARYLAND

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared. The EA documents the need for wildlife damage management at Baltimore/Washington International (BWI) Airport, Maryland and assessed potential impacts of various alternatives for responding to damage problems. The EA analyzes the potential environmental and social effects for resolving wildlife damage related to the protection of property, and health and safety. WS' proposed action is to implement an Integrated Wildlife Damage Management (IWDM) program at BWI airport . Comments from the public involvement process were reviewed for substantive issues and alternatives which were considered in developing this decision.

WS is the Federal program authorized by law to reduce damage caused by wildlife (Act of 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c), and the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2001, Public Law 106-387, October 28, 2000. Stat. 1549 (Sec 767). 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). WS uses an IWDM approach, commonly known as Integrated Pest Management (WS Directive 2.105) in which a combination of methods may be used or recommended to reduce damage. WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). All WS wildlife damage management activities are in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973.

Consistency

The analyses in the EA demonstrate that Alternative 1: 1) best addresses the issues identified in the EA, 2) provides safeguards for public health and safety, 3) provides WS the best opportunity to reduce damage while providing low impacts on non-target species, 4) balances the economic effects to property, and 5) allows WS to meet its obligations to government agencies or other entities.

Monitoring
The Maryland WS program will annually review its impacts on wildlife species addressed in the EA to ensure that WS program activities do not impact the viability of target and non-target wildlife species. In addition, the EA will be reviewed each year to ensure that it and the analysis are sufficient.

Public Involvement
The pre-decisional EA was prepared and released to the public for a 30-day comment period by a legal notice in *The Baltimore Sun, Capital-Gazette Newspaper*, and *Maryland Gazette*. WS received one request for a copy of the Pre-Decisional EA. No comments were received during the comment period.

Major Issues
The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Effects on Target Wildlife Species Populations
- Effects Other Wildlife Species Populations, including T&E Species
- Economic Losses to Property as a Result of Wildlife Damage
- Effects on Human Health and Safety
- Effects on Aesthetics
- Humaneness and Animal Welfare Concerns of Lethal Methods Used by WS

Affected Environment
The affected area includes Baltimore/Washington International Airport within the perimeter fence and adjacent properties. Adjacent properties include all public and private lands and waters within a 2 mile radius of BWI airport property. BWI Airport and areas within the critical zone (approx.2 miles) contain types of habitat such as woodlands, wetlands, grasslands, and suburban areas.

Alternatives That Were Fully Evaluated
The following four alternatives were developed to respond to the issues. Three additional alternatives were considered but not analyzed in detail. A detailed discussion of the effects of the Alternatives on the issues is described in the EA; below is a summary of the Alternatives.

<u>Alternative 1</u>: WS Integrated WDM program (Proposed Action/No Action).
The proposed action is to continue the current WS WDM program to protect property, and human health and safety at BWI airport. An IWDM approach would be implemented which would allow use of any legal technique or method, used singly or in combination, to meet request or needs for resolving conflicts with wildlife affecting the use of the airfield and safe airport operations. Airport personnel requesting assistance would be provided with information regarding the use of effective non-lethal and lethal techniques. Lethal methods used or recommended by WS would include shooting, trapping, toxicants, or euthanasia following live capture by trapping. Non-lethal methods used or recommended by WS may include habitat alteration, chemical immobilization, repellents, fencing, barriers and deterrents, netting, capture and relocation, and harassment or scaring devices. In many situations, the implementation of non-lethal methods such as habitat alteration, structural modifications, and exclusion-type barriers would be the responsibility of the airport to implement. WDM by WS would be allowed on BWI airport and adjacent properties

(within 2 miles of airport property), when requested, where a need has been documented and upon completion of an Agreement for Control. All management actions would comply with appropriate federal, state, and local laws.

Alternative 2: WS non-lethal WDM program only.
This alternative would require WS to use and recommend non-lethal methods only to resolve wildlife damage problems. Requests for information regarding lethal management approaches would be referred to the Maryland Department of Natural Resources (MDNR), US Fish and Wildlife Service (USFWS), local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, contract for WS direct control services, use contractual services of private businesses, or take no action. Currently, DRC-1339 and Alpha-Chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal. Under this alternative, Alpha-Chloralose or other approved capture drugs would be used by WS personnel to capture and relocate wildlife.

Alternative 3: WS lethal WDM program only.
Under this alternative, WS would provide only lethal direct control services and technical assistance. Technical assistance would include making recommendations to the USFWS and MDNR regarding the issuance of permits to resource owners to allow them to take wildlife by lethal methods. Requests for information regarding non-lethal management approaches would be referred to MDNR, USFWS, local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS lethal recommendations, implement non-lethal methods or other methods not recommended by WS, contract for WS direct control services, use contractual services of private businesses, or take no action. In some cases, control methods employed by others could be contrary to the intended use or in excess of what is necessary.

Alternative 4: No WS WDM program.
This alternative would eliminate all WS involvement in WDM at BWI airport. WS would not provide direct operational or technical assistance and requesters of WS services would have to conduct their own WDM without WS input. Requests for information would be referred to MDNR, USFWS, local animal control agencies, or private businesses or organizations. Individuals might choose to conduct WDM themselves, use contractual services of private businesses, or take no action. DRC-1339 and Alpha-Chloralose are only available for use by WS employees. Therefore, use of these chemicals by private individuals would be illegal.

Alternative Considered but not Analyzed in Detail:

Technical Assistance Only
This alternative would not allow a WS operational WDM program at BWI airport. WS would only provide technical assistance and make recommendations when requested. This alternative has been determined ineffective based upon the unsuccessful attempts by airport personnel to conduct WDM prior to WS direct control involvement

White-tailed deer population stabilization through birth control
Deer would be sterilized or contraceptives administered to limit the ability of deer to produce offspring. Contraceptive measures for deer can be grouped into four categories: surgical

sterilization, oral contraception, hormone implantation, and immunocontraception (the use of contraceptive vaccines). These techniques would require that deer receive either single, multiple, or possibly daily treatment to successfully prevent conception. The use of this method would be subject to approval by Federal and State Agencies. This alternative was not considered in detail because: (1) it would take a number of years of implementation before the deer population would decline and therefore, damage would continue at the present unacceptable levels for a number of years; (2) surgical sterilization would have to be conducted by licensed veterinarians, would therefore be extremely expensive, (3) it is difficult, time-consuming, and expensive to effectively live trap, chemically capture, or remotely treat the number of deer necessary to effect an eventual decline in the population; (4) no chemical or biological agents for contracepting deer have been approved for use by State and Federal regulatory authorities.

Live-capture and relocation of white-tailed deer

Under this alternative WS would capture deer alive using cage-type live traps or capture drugs administered by dart gun and then relocate the captured deer to another area. Numerous studies have shown that live-capture and relocation of deer is relatively expensive, time-consuming, and inefficient (Ishmael and Rongstad 1984, O'Bryan and McCullough 1985, Diehl 1988, Jones and Witham 1990, Ishmael et al. 1995). Population reduction achieved through capture and relocation is labor intensive and would be costly ($273-$2,876/deer) (O'Bryan and McCullough 1985, Bryant and Ishmael 1991). Additionally, relocation frequently results in high mortality rates for relocated deer (Cromwell et. al. 1999, O'Bryan and McCullough 1985, Jones and Witham 1990, Ishmael et al. 1995). Deer frequently experience physiological trauma during capture and transportation and deer mortality after relocation has ranged from 25-89% (Jones and Witham 1990, Mayer et al. 1993). O'Bryan and McCullough (1985) found that only 15% of radio-collared black-tailed deer that were live-captured and relocated from Angel Island, California, survived for 1 year after relocation. Although relocated deer usually do not return to their location of capture, some do settle in familiar suburban habitats and create nuisance problems for those communities (Bryant and Ishmael 1991). High mortality rates of relocated deer, combined with the manner in which many of these animals die, make it difficult to justify relocation as a humane alternative to lethal removal methods (Bryant and Ishmael 1991). Chemical capture methods require specialized training and skill. A primary limitation of darting is the limited range at which deer can be effectively hit which is generally less than 40 yards. With modern scoped rifles, however, a skilled sharpshooter can hit the head or neck of a deer for a quick kill out to 200 yards and beyond. Thus, chemical capture is far less efficient, more labor intensive, and much more costly than removal with rifles. Additionally, the American Veterinary Medical Association, the National Association of State Public Health Veterinarians, and the Council of State and Territorial Epidemiologists oppose relocation of mammals because of the risk of disease transmission (USDA 1997).

Finding of No Significant Impact

The analysis in the EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:

1. Wildlife damage management as conducted by WS at BWI Airport is not regional or national in scope.

2. The proposed action would pose minimal risk to public health and safety. Risks to the public from WS methods were determined to be low in a formal risk assessment (USDA 1997, Appendix P).

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. Built-in mitigation measures that are part of WS's standard operating procedures and adherence to laws and regulations will 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 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 this assessment. The EA discussed cumulative effects of WS 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.

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 project would not adversely affect any Federal or Maryland State listed threatened or endangered species. This determination is based on the conclusions made by the FWS during their 1992 programmatic consultation of WS activities and subsequent Biological Opinion (USDA 1997, Appendix F). In addition, WS has determined that the use of WDM methods not included in the 1992 BO will have no effect on the bald eagle. Furthermore WS has determined that WDM methods used by WS will have no effect on any listed plant species. WS has determined that WS WDM activities at BWI airport and adjacent properties would not adversely affect any State listed T&E species and species in Need of Conservation. The MDNR concurs with WS not likely to adversely affect determination.

10. The proposed action would be in compliance with all federal, state, and local laws.

Decision and Rationale

I have carefully reviewed the Environmental Assessment (EA) prepared for this proposal and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 1 (WS Integrated Wildlife Damage Management Program

(Preferred Alternative/No Action)) and applying the associated mitigation measures discussed in Chapter 3 of the EA. Alternative 1 is selected because (1) it offers the greatest chance at maximizing effectiveness and benefits while minimizing cumulative impacts on the quality of the human environment that might result from the program's effect on target and non-target species populations; (2) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health and safety; and, (3) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of these issues are considered. Therefore, it is my decision to implement the preferred alternative as described in the EA.

Copies of the EA are available upon request from the Maryland Wildlife Services Office,1568 Whitehall Road, Annapolis, MD 21401.

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Charles S. Brown, Regional Director Date
APHIS-WS Eastern Region

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