DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT

Management of Feral and Free-Ranging Cat Populations to Reduce Threats to Human Health and Safety and Impacts to Native Wildlife Species In the Commonwealth of Puerto Rico

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife in Puerto Rico. WS has prepared an environmental assessment (EA) that analyzes alternatives for managing feral and free-ranging cat populations to reduce threats to human healthy and safety and impacts to native wildlife species in the Commonwealth of Puerto Rico. APHIS procedures for implementing the National Environmental Policy Act (NEPA) allows for the categorical exclusion of individual wildlife damage management actions (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). However, to properly address WS involvement in this action statewide, an EA was prepared to facilitate planning, interagency coordination, and the streamlining of program management, and to clearly communicate with the public the analysis of cumulative impacts. The pre-decisional EA released by WS in April 11, 2003, documented the need for managing feral and free-ranging cat populations to reduce threats to human health and safety and impacts to native wildlife species in the Commonwealth of Puerto Rico and assessed potential impacts of various alternatives for responding to feral and free-ranging cat issues involving human health and safety and predation. Comments from the public involvement process were reviewed for substantial issues and alternatives which were considered in developing this decision.

WS's proposed action was to implement an integrated wildlife damage management program that would include education and non-lethal and lethal methods to reduce threats to human health and safety and impacts to native wildlife species in the Commonwealth of Puerto Rico and to incorporate WS's current technical assistance approach to managing feral and free-ranging cat conflicts with humans and wildlife. Direct control assistance will only take place after a request for services has been received and where permission has been granted by private landowner or government manager. All WS wildlife damage management activities are conducted in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973.

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 *San Juan Newspaper* on April 11, 2003. The pre-decisional EA was also mailed directly to agencies, organizations, and individuals with probable interest in the proposed program. WS recieved one request for a copy of the pre-decisional EA. No comment letters were received by WS within the said comment period.

Monitoring

Review of the EA and associated Decision/FONSI will be conducted each year. This review will take place at the time of the wildlife damage management work planning process and will involve WS, City of San Juan, the NPS and other appropriate agencies and/or entities to ensure that the EA and its anyalsis is sufficient.

Affected Environment

The areas of the proposed action include the entire Island of Puerto Rico, but more specifically, areas where free-ranging and feral cat threats to human health and safety and impacts to native wildlife species has occurred or may occur in the future. The proposed action could occur on private or public properties within the Commonwealth of Puerto Rico.

Objectives

The objectives of the proposed action are to:

1) Respond to 100% of the requests for assistance with the appropriate action (technical assistance or direct control) as determined by Florida/Puerto Rico WS personnel, applying the ADC Decision Model (Slate et al. 1992).

2) Reduce and eliminate feral and free-ranging cat populations to the greatest extent possible, on properties with a federal WS operational program.

3) Reduce or eliminate human health and safety, and nuisance issues concerning feral and free-ranging cats to the greatest extent possible, on properties with a federal WS operational program.

4) Reduce the impact of feral and free-ranging cats on native wildlife species, on properties with a federal WS operational program.

5) Live-capture all cats possible, within control areas, before resorting to lethal methods and transfer all live-trapped cats to animal shelters.

6) Maintain the lethal take of nontarget animals by WS personnel during damage management to less than 1% of the total animals taken.

Major Issues

Several major issues were contained in scope of this EA. These issues were consolidated into the following 6 primary issues to be considered in detail:

1) Effects of Feral and Free-Ranging Cats on Human Health and Safety, and Native Wildlife

2) Effects on Target Species Populations

3) Effects of Control Methods on Nontarget Species Populations, Including T&E Species

4) Humaneness of Control Methods

5) Effects of Control Methods on Human Health and Safety

6) Effects on the Aesthetic Values of Targeted Species and Protected T&E Species

Alternatives Analyzed in Detail
Five potential alternatives were developed to address the issues identified above. A detailed discussion of the anticipated effects of the alternatives on the objectives and issues are contained in the EA. The following summary provides a brief description of each alternative.

Alternative 1 - No Action - This alternative precludes any and all WDM activities by WS to protect human health and safety, alleviate nuisance issues, and protect native wildlife species from impacts associated with feral and free-ranging cat populations in the Commonwealth of Puerto Rico.

Alternative 2 - Nonlethal Control Before Lethal Control - This alternative would not allow the use of lethal control by WS until all available nonlethal methods had been applied and determined to be inadequate in each damage situation.

Alternative 3 - Nonlethal Control Only - This alternative would involve the use of nonlethal management techniques only by WS.

Alternative 4 - Lethal Control Only - This alternative would involve the use of lethal management techniques only by WS.

Alternative 5 - Integrated Wildlife Damage Management (the Proposed Action) - This alternative would incorporate an integrated approach to wildlife damage management using components of the wildlife damage management techniques and methods addressed in Alternatives 2, 3, and 4, as deemed appropriate by WS and other participating entities.

Alternatives Considered but not Analyzed in Detail with Rationale

1) Trap, Neuter, and Release (TNR) or Trap, Neuter, Vaccinate, and Release (TNVR) Alternative - This topic has undergone considerable debate in animal welfare and scientific communities for a number of years. Two main questions or viewpoints dominate this debate: 1) Does trap-neuter-release work in controlling cat populations over the long run or even the short run? and 2) Does TNR programs address or alleviate problems (i.e., diseases) created by cat colonies? Trap, neuter, and release programs have been going on for decades in Britain and Europe. Today, feral and free-ranging cats are causing the same problems they were causing ten years ago. Cat colonies have not died out or reduced in size, many continue to increase. Common consensus is that some cat colonies stabilize, but never come close to extinction. Many of these colonies would not survive if it were not for the supplemental feeding by humans in some areas (Smith and Shane 1986). So the problem with wildlife and human health issues have not been resolved by the TNR philosophy.

The National Association of State Public Health Veterinarians and the American Veterinarians Medical Association oppose TNR programs based on health concerns and threats (JAVMA 1996). First, diseases and parasites transmitted by cats to humans including ringworm, bartonellosis, larval migrans, cat scratch fever, toxoplasmosis, and vector-borne zoonotic diseases are not controlled in colony situations. Second, rabies is a major concern because cats are the number one domesticated species testing positive for rabies in the United States and other species commonly infected by the disease are also attracted to feeding stations in cat colonies.

As a result of the prevalent and perpetual threat to human health and safety created by TNR programs (cat colonies) and the continued threat to threatened and endangered wildlife and native wildlife in general, WS will not consider this issue further or be a participant of TNR programs in Puerto Rico.

2) Frightening Devices Alternative - Frightening devices such as electronic guards, pyrotechnics, propane cannons, and lights can be used to temporarily alleviate some animals' activity. The effectiveness of these devices depends upon the individual animal's fear of, and subsequent aversion to the offensive stimuli. Once an animal habituates to these stimuli, it often resumes its normal activities and movements.

The continuous and prolonged utilization of artificial lighting along some locations could have significant impacts on certain wildlife species. One well documented problem has been with beach habitats and nesting sea turtles and shorebirds. The use of artificial lighting may deter female sea turtles (Witherington and Martin 1996) and shorebirds, discouraging them from nesting at historic nesting sites. In addition, newly hatched sea turtles are strongly attracted to light sources (Raymond 1984, Witherington 1995, Witherington 1991). This disorientation could lead to increased mortality due to predation, dehydration, and exhaustion. Lights could also inhibit the foraging behavior of other nocturnal species. Additionally, artificial lights will not alter long-term cat behavior by disrupting movement or causing avoidance of lite site in urban areas.

The impact of noise resulting from the use of electronic guards, pyrotechnics, and propane exploders would not be allowed in an urban setting for extended periods of time. There is little evidence to suggest that such frightening techniques would cause cats to avoid an area. Noise associated with the above devices, potentially could impact both the humans and native wildlife proposed for protection in this EA.

3) Trap and Relocate Back into the Wild Alternative - This alternative would allow the live capture of feral and free-ranging cats using cage traps, snares, and/or leghold traps. Captured animals would be tranquilized and translocated to other areas where they would be released back into the wild or free living state.

Relocation of wildlife is often viewed as inhumane and biologically unsound management, especially when the wildlife species being relocated is already abundant or common in an area. Relocated animals are forced into a new environment where they often have to compete for space and resources with already well established animals of the same species or species better adept to

live in a wild situation. This is especially true of feral and free-ranging cats These cats originated from domesticated stock, one or two generations removed, that were bred to be companion animals in a human dwelling or household and not as wild, self-reliant animals. Consequently, WS will not relocate any feral and free-ranging cats captured during control operations back into the wild. Relocation will consist only of the transfer of captured cats to animal shelter facilities. If certain segments of the public demand relocation, then it will be up to that group(s) to acquire the appropriate permits and/or homes for the cats.

4) Biological Control Alternative - Biological control is most commonly used to control select evasive plant and insect species. Very little effort has been devoted to the biological control of feral and free-ranging cats for two reasons: 1) there has not been any biological control agent developed that will work on feral and free-ranging cat populations only and not effect cats kept indoors and 2) it is not known how any potential biological control agents for cats would effect other closely related species (Dobson 1988).

5) Poisoning Alternative - Historically, poisoning has been a common practice in controlling many nuisance wildlife populations. It was common for both target and non-target species to be negatively impacted by broad scale poisoning campaigns. The use of select toxicants have proven effective at removing feral cats on some island situations in New Zealand (Eason 1992) and poisoning is still commonly used to control some nuisance species in the United States (i.e., rodents, starlings, etc.). However, due to concerns associated with poisoning, Wildlife Services will not incorporate poisoning into its integrated wildlife damage management program in Puerto Rico for controlling feral and free-ranging cats.

Finding of No Significant Impact (FONSI)

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) Feral and free-ranging cat damage management, as conducted by WS in the Commonwealth of Puerto Rico, is not regional or national in scope.

2) Based on the analysis documented in the EA, the impacts of the proposed action will not significantly affect public health or safety. Risks to the public from WS methods were determined to be low in a formal risk assessment (USDA 1997, Appendix P).

3) The proposed action will not have a significant impact on unique characteristics such as park lands, wetlands, wild and scenic areas, or ecologically critical areas. 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 certain individuals may be opposed to managing feral and free-ranging cat populations, this action is not controversial in relation to size, nature, or effects.

5) Mitigation measures adopted and/or described as part of the proposed action minimize risks to the public, prevent adverse effects on the human environment, and reduce uncertainty and risks. Effects of methods and activities, as proposed, are known and do not involve uncertain or unique risks.

6) The proposed action does not establish a precedent for future actions with significant effects, including future feral and free-ranging cat damage management that may be implemented or planned within the Commonwealth of Puerto Rico.

7) No significant cumulative effects were identified through this assessment. The number of feral and free-ranging cats that will be taken by WS annually is very small in comparison to regional and island wide populations. Adverse effects on wildlife species and on wildlife habitat would be minimal. 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 Commonwealth of Puerto Rico.

8) This action will not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historic resources. Wildlife damage management would not disturb soils or any structures and, therefore, would not be considered a "Federal undertaking" as defined by the National Historic Preservation Act.

9) WS determined that the proposed project would not adversely affect Federally or State listed species in the Commonwealth of Puerto Rico. This determination was concurred with by the Puerto Rican government (C. Maysonet-Negrón, Dept. of Natural and Environmental Resources, Administrator) and the USFWS (D. Flemming, USFWS, Ecological Services).

10) The proposed action is consistent with local, state, and Federal laws that provide for or restrict WS wildlife damage management. Therefore, WS concludes that this project is in compliance with federal, state and local laws for environmental protection.

Decision and Rational

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 5 (*Integrated Wildlife Damage Management - Proposed Action*) and applying the associated mitigation measures discussed in Chapter 3 of the EA. Alternative 5 is selected because (1) it offers the greatest chance at maximizing effectiveness and benefits to resource owners and managers 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 proposed action as described in the EA.

Copies of the EA are available upon request from the USDA, APHIS, WS, 2820 East University Avenue, Gainesville, FL 32641.

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Charles S. Brown
Eastern Regional Director
USDA-APHIS-WS

Date

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ENVIRONMENTAL ASSESSMENT

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In Cooperation with:

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