Environmental Action Statement (EAS)
U.S. Department of the Interior
U.S. Fish and Wildlife Service (FWS)
April 3, 2019

OFFICE: USFWS, Region 6, Migratory Bird Program

PROPOSED ACTION TITLE/TYPE: Bird Damage Management (BDM) in Colorado

LOCATION/LEGAL DESCRIPTION: State of Colorado

APPLICANT (if any): USDA, APHIS, Colorado Wildlife Services Program (WS)

Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

The proposed action is for U.S. Fish and Wildlife Service to issue a Migratory Bird Depredation (Migratory Bird Treaty Act, 50 CFR 21.41) permit to USDA-APHIS-Colorado Wildlife Services (WS) in order to respond to requests for BDM to protect human health and safety, agricultural resources such as livestock feed, livestock, livestock health, aquaculture, and crops, property such as turf, landscaping, and structures, and natural resources such as T&E species, other wildlife, and forestry in Colorado. More specifically, WS has applied for a Depredation permit for the removal of 2,000 resident Canada Geese along the Front Range of Colorado (essentially from Pueblo to Fort Collins) from June 1, 2019 through December 31, 2019. The three primary components of the WS BDM program in Colorado have been the goal of reducing threats or hazards to human health and safety at airports, the protection of livestock feed and the risk of bird-related livestock health problems. Additionally, WS has conducted BDM where overabundant resident Canada Geese were causing excessive damage, primarily in urban areas. However, several projects also have been conducted for migratory Canada/Cackling Geese, all but a few at airports where they posed a wildlife hazard to aircraft. Other projects involved associated damage at a water treatment plant and human safety where nesting geese were attacking pedestrians/bicyclists when they neared the nest. On average, WS has taken 143 Canada Geese from FY06 to FY10, a minimal number that did not impact the population. These geese mostly came from the "resident" population. WS has also hazed an average of 75,000 Canada Geese annually from FY06 to FY10, more than any other species except Red-winged Blackbirds, primarily at airports. Program goals for Colorado WS are also to minimize damage or the risk of damage to other agricultural resources, natural resources such as wildlife species, property, or other public or private resources from birds, and to conduct disease surveillance. To meet these goals, WS has the objective of responding to all requests for assistance with, at a minimum, technical assistance or self-help advice, or, where appropriate and when cooperative or congressional funding is available, direct control assistance where professional WS personnel conduct BDM.

Colorado WS anticipates that BDM could be conducted most often for "resident" Canada Geese (rather than on geese that migrate through or overwinter in Colorado), with the possibility of taking up to 2,000 geese in 2019. In fact, many WS programs nationally have requested to cull a few thousand annually in various states as the populations have increased exponentially (page 128 in EA). Following a similar pattern to other areas where Canada Geese were introduced or transplanted, Colorado WS has recently seen an increase in requests to conduct "culling" to reduce populations considered overabundant, especially in parks and at golf courses with considerable damage. BDM by WS would be allowed in Colorado upon issuance of a Depredation Permit by USFWS, when requested, on private property sites or public facilities where a need has been documented, upon completion of an Agreement for Control. All management actions would comply with appropriate federal, state, and local laws.

Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

U.S. Department of Agriculture-Animal and Plant Health Inspection Service- Colorado Wildlife Services Program. 2013. Final Environmental Assessment, Finding of No Significant Impact, and Decision for Bird Damage Management in Colorado. USDA-APHIS-WS, 12345 West Alameda Pkwy, Suite 210, Lakewood, CO 80228. 208 pp.

U.S. Department of Agriculture-Animal and Plant Health Inspection Service-Colorado Wildlife Services Program. 2013. Finding of No Significant Impact and Decision for Bird Damage Management in Colorado. 8pp.

NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes, the new proposed action is similar to the existing NEPA documents and any activities will occur in the same analysis area. There are no differences between the proposed actions, specifically for resident Canada Geese, and those listed under the existing NEPA document. The U.S. Fish and Wildlife Service is proposing to adopt the EA published by WS in 2013, for its NEPA compliance in consideration of WS' depredation permit application.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, the alternatives analyzed in the existing NEPA documents are appropriate for the current proposed actions to manage resident Canada Geese causing various forms of damage or hazards. No new alternatives are being proposed by either USFWS or WS to address additional issues or concerns. No new information has been identified for resident Canada Geese that requires change or consideration of new alternatives.

3. Is the existing analysis valid in light of any new information or circumstances? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, WS' 2013 EA analyzed impacts to the appropriate affected environment for the proposed action that USFWS is considering. The 2013 EA analyzed the impacts associated with removal of birds that damage resources within the state of Colorado. The take of 2,000 geese would represent 15% of the annual mortality or 6% of the total population, which is not expected to impact viability of the population (Page 129 in EA). WS would coordinate removal efforts with Colorado Parks and Wildlife to determine if they wanted to translocate the Canada Geese to a wildlife management area, as this has been shown to be successful (Hall and Groninger 2002), but could move problems to other areas of the state (e.g., Canada Geese damage urban landscaping could be moved to a wildlife management area where close by crops would become damaged). Overall, WS believes that it will take relatively few geese to resolve problems in most areas, but could take higher numbers of geese in urban areas where their population is abundant. Most of WS' actions will be conducted in June and early July when geese are flightless (i.e., when molting/replacing flight feathers). The numbers associated with the removal of birds will have no negligible effects on the population levels of those birds. Currently there is no new information or circumstances involving resident Canada Geese in Colorado that would change the analysis of the WS' proposed action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, both the direct and indirect level of take associated with management of bird damage across the state of Colorado would be similar both quantitatively and qualitatively to the existing NEPA document. WS is proposing a take of 2000 resident Canada Geese along the front range of Colorado. This information is provided in the 2013 EA and discussed on pages 128-130.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. When this EA first came out, there was a 34-day comment period along with a Notice of Availability which included a link to view the EA was sent directly to 67 interested parties on National and State mailing list compiled from direct requests for WS EAs and previous NEPA document mailing including Native American Tribes, agencies, interested groups, and individuals. USFWS was not a Cooperating Agency on the 2013 EA from WS; thus USFWS will open a 30 day public comment period to receive comments on our proposal to adopt this EA to support a decision on a permit application dealing with management of resident Canada Geese.

6. Persons/Agencies/FWS Staff Consulted

Refer to the 2013 EA for a complete list of the team members and public who participated in the preparation of the previous environmental analyses or planning documents (page 172 in EA). This document was reviewed and analyzed by the FWS Region 6, Migratory Bird Program, as shown below.

Name	Title	Assignment
David Olson	Wildlife Biologist	EAS Author
Brian W. Smith	Chief, Migratory Bird Program	Managerial Review

Conclusions

Based on the review documented above, I conclude that the WS 2013 EA adequately supports and conforms to the requested depredation permit application submitted to USFWS by WS, and that the NEPA documentation fully covers the proposed action and constitutes USFWS' compliance with the requirements of the NEPA. The final permit decision will be documented in a decision record, and in a FONSI, if appropriate to do so after considerations of public comments.

Wildlife Biologist, Dave Olson — Date: 4/3/19

Migratory Bird Chief, Brian W Smith — Date: 4/3/19

Deputy Regional Director — Date: 4.5.19

Agency Contacts

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