

FINDING OF NO SIGNIFICANT IMPACT

Adoption of the U.S. Department of Agriculture, Animal and Plant Health Inspection Service Decision Finding of No Significant Impact for Field Release of the Insects *Calopltya latiforceps* (Hemiptera: Calophyidae) and *Pseudophilothrips ichini* (Thysanoptera: Phlaeothripidae) for Classical Biological Control of Brazilian Peppertree in the Contiguous United States and on the Lower Suwannee National Wildlife Refuge, Florida

January 2021

Proposed Action and Alternatives: The U.S. Fish and Wildlife Service (USFWS), National Wildlife Refuge System (NWRS) will allow the environmental release of an insect, *Pseudophilothrips ichini* (agent or thrips), (Thysanoptera: Phlaeothripidae), at the Lower Suwannee National Wildlife Refuge (NWR or Refuge). The agent will be used for the biological control of the noxious, invasive-exotic Brazilian Pepper Tree (BP), *Schinus terebinthifolius*. Before allowing the release of *Pseudophilothrips ichini*, USFWS must analyze the potential impacts of the release of this organism onto Refuge lands. The USFWS hereby adopts the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) *Pseudophilothrips ichini* Environmental Assessment (EA) that analyzed the potential environmental consequences of this action within the continental U.S. (USDA 2019).

The EA analyzed the following two alternatives in response to a request for permits authorizing environmental release of *Pseudophilothrips ichini*: (1) no action, and (2) allowing the release of *Pseudophilothrips ichini* (thrips) for biological control of *Schinus terebinthifolius*. A third alternative, to allow a thrips release with special provisions or requirements concerning release procedures or mitigating measures, was considered. However, this alternative was dismissed because no issues were raised that indicated that special provisions or requirements were necessary. The No Action alternative, as described in the EA, would likely result in the continued use at the current level of chemical, mechanical, and biological control methods for the management of BP. These control methods described are not alternatives for decisions to be made by APHIS but are presently being used to control BP on the Refuge and may continue regardless of field release(s) of *Pseudophilothrips ichini*.

Public Review: Notice of the USDA EA was made available in the Federal Register on February 27, 2019 for a 30-day public comment period by the USDA APHIS, Plant Protection and Quarantine, Pests, Pathogens, and Biocontrol Permits branch. APHIS received a total of [129 comments on the EA](#) by the close of the comment period ([USDA May 2019](#)). Most comments (120) were in favor of the release of the biological control agents ([USDA May 2019](#)). Nine

comments were either not in favor of or raised concerns regarding the release of the two agents ([USDA May 2019](#)). These comments are addressed in Appendix 7 of the USDA APHIS document ([USDA May 2019](#)).

Selected Action: Alternative 2 – Adopt the USDA’s FONSI and allow the release of *Pseudophilothrips ichini* for biological control of the Brazilian Pepper Tree, *Schinus terebinthifolius*

Refuge Goals, Objectives and Resources

These purposes and the mission of the National Wildlife Refuge System (NWRS) are fundamental to determining the goals and objectives of proposed management actions for the Lower Suwannee NWR. Both the [NWRS Mission](#) and the purposes of the Refuge include habitat restoration.

The purposes of Lower Suwannee NWR are:

...” to protect, maintain, enhance, and where appropriate, restore habitats along the lower reaches of the Suwannee River.” ([Lower Suwannee and Cedar Keys NWRs Comprehensive Conservation Plan 2001](#)).

Lower Suwannee NWR already conducts extensive and costly (in staff time, capacity, equipment, chemicals, and maintenance support) invasive plant species removal, primarily BP, through mechanical, physical, and chemical treatments; both with staff and with volunteers. The [Refuge’s 2001 Comprehensive Conservation Plan’s](#) (CCP) Wildlife Strategy 1.1.11 identifies invasive species control as a management priority, which has been ongoing for years, as it is on most Florida NWRs and State-managed lands. For land managers in Florida, BP control efforts are a standard part of *pro forma* operations.

The 2019 USDA APHIS Decision and Findings of No Significant Impact document analyzed the effects of the release of *Pseudophilothrips ichini* for biological control of the BP and found that the thrips are sufficiently host-specific posing little, if any threat, to United States’ biological resources including non-target plant species. *Pseudophilothrips ichini* posed no threat or cumulative impact to the health of animals and humans, and found thrips are not likely to adversely affect federally listed species or their critical habitats ([USDA April 2019](#)).

Finding of No Significant Impact

I have decided to authorize the USFWS NWRS Lower Suwannee NWR to allow the environmental release of thrips, *Pseudophilothrips ichini*. The reasons for my decision are:

- The 2019 USDA NRCS [analysis, review, and approval process](#) for release of biological control agents is exhaustive. Public comments on the release of *Pseudophilothrips ichini* for biological control of the Brazilian pepper tree, *Schinus terebinthifolius* provided much valuable, supportive feedback available in [the Federal Register](#). This was completed prior to release approval and is well substantiated in a thorough public review.
- Biological control of Brazilian pepper tree has had long term support from Florida Fish and Wildlife Conservation Commission, U.S. Army Corps of Engineers (in Florida), Southwest Florida Water Management, Florida Department of Agriculture and Consumer Services, University of Florida Institute for Food and Agricultural Sciences, and the Comprehensive Everglades Restoration Program (CERP). Florida’s Department of Agriculture and Consumer Affairs thrips (*Pseudophilothrips ichini*) project team included researchers at the University of Florida and members of the USDA’s Agricultural Research Service (Steiniger, email personal communication).
- Two thrips releases occurred within the state of Florida in 2019; the first official release was in July 2019 in a Broward County park ([Tree Tops Park in Davie](#)) and the other was on the [Adam’s Ranch cattle ranch](#) in Ft. Pierce. Additionally, many other releases have been coordinated on agriculture/cattle lands, on military bases and other federal property in central and south Florida, and throughout CERP areas under guidance from several conservation/land/water management agencies operating in the Everglades (Steiniger, email personal communication).
- The USDA APHIS FONSI and Environmental Assessment were closely reviewed and found sufficient (USDA April 2019 and May 2019). The U.S. Fish & Wildlife Service was a close partner agency to this effort and in the Section 7 process (Hall, C. and W. Thomas, personal and email communication, 2020).
- This biological control agent is sufficiently host-specific and poses little, if any, threat to the biological resources (USDA April 2019, page 2) of the Refuge.
- The release “may affect but is not likely to adversely affect” federally listed threatened and endangered species or their habitats (USDA April 2019, page 2) on the Refuge (Region 4 Intra-Service Section 7 Biological Evaluation Form, April 2020).
- *Pseudophilothrips ichini* poses no threat to the health of humans or wild or domestic animals (USDA April 2019, page 2).
- Negative cumulative impacts are not expected from release of *Pseudophilothrips ichini*.

- There are no disproportionate adverse effects to minorities, low-income populations, or children in accordance with Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations" and Executive Order 13045, "Protection of Children from Environmental Health Risks and Safety Risks" (USDA April 2019, page 2).
- The use of a biological control agent for BP is consistent with and supports integrated pest management (IPM) for control of invasive plants as required by [Department of Interior's IPM Policy \(517 DM 1\)](#) and [USFWS's IPM Policy \(569 FW 1\)](#). In accordance with these policies, the use of biocontrols would likely reduce pesticide usage on refuge lands to control BP and achieve resource management objectives. The Service has determined that the introduction of *Pseudophilothrips ichini* outside the historic range is essential for the control of BP (Hall 2020).
- Although there is not total assurance that the release of *Pseudophilothrips ichini* into the environment will be reversible, there is no evidence this organism will cause any adverse environmental effects (Hall 2020).
- The release of *Pseudophilothrips ichini* or the biological control of BP is consistent with [601 FW 3 \(Biological Integrity, Diversity, and Environmental Health \[BIDEH\]\)](#) Introduction of *Pseudophilothrips ichini* is essential for control of BP ([Policy 601 FW 3.3](#)).
- Use of a biological control agent for BP is consistent with the purposes of Lower Suwannee NWR, the requirements of the National Wildlife Refuge System Administration Act, as amended; and other applicable statutes, regulations and policies governing management of national wildlife refuges, including the Endangered Species Act.
- The actions and effects that could occur on the Lower Suwannee NWR have been fully analyzed herein and they are consistent with those in the EA, which covers the surrounding landscapes.

Document Availability

In addition to the public engagement detailed above, the USDA's 2019 Environmental Assessment and their Finding of No Significant Impact were made available to the public for a 30-day review period from June 2020 into July 2020 as part of a proposed Refuge Compatibility Determination review. The USDA's 2019 Environmental Assessment and their Finding of No Significant Impact was again distributed for a 30-day public review period which began in 4

November 2020 and ended 6 December 2020 when the Refuge analyzed this action, as such, and developed our own FONSI, adopting the USDA 2019 FONSI.

Copies of the all the relevant documents were available in the [Lower Suwannee and Cedar Keys National Wildlife Refuges office](#) and on line on the following websites: [Cedar Key News](#), [Lower Suwannee NWR's](#) and [Cedar Keys NWR's](#) websites, and the [Friends of the Lower Suwannee and Cedar Keys NWRs](#) website. The public had had the opportunity to call the Refuge Manager to view or have copies made of all the relevant documents and reference documents. The documents and all the references contained therein, and listed in this document, were available as web links on the afore listed websites and distributed to local news outlets: Cedar Key News, Gainesville Sun, Dixie County Advocate, and the Chiefland Citizen.

The two comments received by 24 July, the first public comment period, were supportive of the action (Appendix A). One comment urged caution on the unintentional introduction of non-native species such as *Pseudophilothrips ichini*. No comments were received by 6 December, from the second public comment period.

An environmental impact statement (EIS) must be prepared if implementation of the proposed action may significantly affect the quality of the human environment.

I have determined that there would be no significant impact to the human environment from the implementation of either of the action alternatives and, therefore, no EIS needs to be prepared.

David Viker
Regional Chief, National Wildlife Refuge System
South Atlantic-Gulf and Mississippi Basin Unified Regions
U.S. Fish and Wildlife Service

Date

Supporting References:

- 2001. Lower Suwannee and Cedar Keys NWRs Comprehensive Conservation Plan. USFWS NWRs, Atlanta, Georgia.

- 2019. Regulations.gov: Notice of Availability of an Environmental Assessment for the Release of Biological Control of Brazilian Peppertree. Docket ID: APHIS-2018-0075. USDA APHIS; Link:

<https://www.regulations.gov/docketBrowser?rpp=50&so=DESC&sb=postedDate&po=0&dct=PS&D=APHIS-2018-0075>.

February 2019. USDA, Federal Register: Notice of Availability of an Environmental Assessment for the Release of Biological Control of Brazilian Peppertree, A Notice by the APHIS on 02/27/2019. APHIS, USDA. Link:

<https://www.federalregister.gov/documents/2019/02/27/2019-03322/notice-of-availability-of-an-environmental-assessment-for-the-release-of-biological-control-of>.

April 2019. USDA, Marketing and Regulatory Programs, APHIS Decision and Finding of No Significant Impact for Field Release of the Insects *Caloptya latiforceps* (Hemiptera: Calophyidae) and *Pseudophilothrips ichini* (Thysanoptera: Phlaeothripidae) for Classical Biological Control of Brazilian Peppertree in the Contiguous United States.

May 2019. USDA, [Environmental Assessment: Field Release of the Insects *Calophya latiforceps* \(Hemiptera: Calophyidae\) and *Pseudophilothrips ichini* \(Thysanoptera: Phlaeothripidae\) for Classical Biological Control of Brazilian Peppertree in the Contiguous United States](#). Plant Protection and Quarantine, Animal and Plant Health Inspection Service, U.S. Department of Agriculture, Riverdale, Maryland.

USDA, APHIS website; Summary:

http://www.aphis.usda.gov/plant_health/ea/biocontrol_weeds.shtml; *Pseudophilothrips ichini* Materials: <https://usdasearch.usda.gov/search?utf8=%3F&affiliate=usda-aphis&query=Pseudophilothrips+ichini&commit=Search>.

July 2019. CBS TV Channel 4, Miami News, Davie, Florida;, “Tiny Bugs Being Used To Fight Invasive Brazilian Peppertree In South Florida:

<https://miami.cbslocal.com/2019/07/16/tiny-bugs-being-used-to-fight-invasive-brazilians-peppertree-in-south-florida/>. July 16, 2019 at 6:05 pm. Link: <https://miami.cbslocal.com/2019/07/16/tiny-bugs-being-used-to-fight-invasive-brazilians-peppertree-in-south-florida/>.

October 2019. National Public Radio All Things Considered. “Florida Researchers Use Pests to Help Control Pesky Brazilian Peppertree Plant”, October 30, 2019 12:00 PM ET. Link:

<https://www.npr.org/2019/10/30/774415087/florida-researchers-use-pests-to-help-control-pesky-brazilian-peppertree-plant>.

April 2020. Hall, Cindy and William Thomas. National Invasive Species Coordinator and Southeast Region Invasive Species Coordinator, U.S. Fish & Wildlife Service, National

Wildlife Refuge System, Washington, D.C. and Boynton Beach, Florida; personal communication.

April 2020. Region 4 Intra-Service Section 7 Biological Evaluation Form, Field Release of *Pseudophilothrips ichini*, (Thysanoptera: Phlaeothripidae), for Biological Control of Brazilian Pepper Tree, *Schinus terebinthifolius*, at the Lower Suwannee National Wildlife Refuge, Florida. Northeast Florida Ecological Services Field Office, Jacksonville, Florida.

May 2020. Steiniger, Sedonia; Biological Scientist, Division of Plant Industry, Florida Department of Agriculture and Consumer Services, Gainesville, Florida. Email personal communication 7 May 2020.

February 2020. Hall, Cindy, U.S. Fish and Wildlife Service National Coordinator Integrated Pest Management. Email Subject: Template for Biocontrol FONSI; Friday 2/21/2020 9:37 AM; To: Thomas, William G; Cc: Gude, Andrew; Attachment: FONSI Template - NEPA Adoption for Biocontrol.docx 18 KB.

APPENDIX A

A Summary of Public Comments and Responses from the U.S. Fish and Wildlife Service

Summary of Public Comments on the Finding of No Significant Impact for Field Release of the Insects Calopltya latiforceps (Hemiptera: Calophyidae) and Pseudophilothrips ichini (Thysanoptera: Phlaeothripidae) for Classical Biological Control of Brazilian Peppertree in the Contiguous United States and for Field Release of Pseudophilothrips ichini, for Biological Control of Brazilian Pepper Tree, Schinus terebinthifolius, on the Lower Suwannee National Wildlife Refuge, Florida.

Public comment on the Finding of No Significant Impact for field release of the *Pseudophilothrips ichini* (thrips) for biological control of the highly invasive Brazilian Peppertree on the Lower Suwannee National Wildlife Refuge, Florida (NWR) were submitted in writing. Comments were received during the public review and comment period from two members of the general public.

Under NEPA, the Service must respond to substantive comments. For the purposes of this planning process, a substantive comment is one that was submitted during the public review and comment period, which was within the scope of the proposed action, was specific to the proposed action, had a direct relationship to the proposed action, and included reasons for the Service to consider it. For example, a substantive comment could be that the document referenced 500 individuals of a particular species, but that current research found 600. In such a case, the Service would likely update the document to reflect the 600, citing the current research. While a comment that would not

be considered substantive would be: “We support the proposal.” Comments outside the scope of the proposal were not addressed.

One substantive comment is summarized, and the associated Service response is included.

Comment:

I presume that the FWS has performed due diligence in regard to the impact of *Pseudophilothrips ichini* on non-target species. It is always a risk to introduce nonnative species, but in this case, given the impact of *Schinus* on coastal ecosystems throughout Florida, I urge you to proceed with caution.

Response:

The U.S. Department of Agriculture’s Animal and Plant Health Inspection Service was the lead on the environmental compliance (cited in the publicly reviewable Compatibility Determination) for the thrips releases in Florida. They did an extensive review of this with multiple cooperating and consulting agencies, one of which was the Service.