

## **ADOPTION AND FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY MAMMAL DAMAGE MANAGEMENT IN GEORGIA**

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program in Georgia conducts programs to resolve or prevent damage from animals to agricultural resources, natural resources, and property, including threats to human safety. WS and the Tennessee Valley Authority (TVA) have identified those mammal species most likely to be responsible for causing damage in the State based on previous requests for assistance. Identified mammals associated with damage and threats of damage in GA are bobcats (*Lynx rufus*), beaver (*Castor canadensis*), coyotes (*Canis latrans*), eastern chipmunk (*Tamias striatus*), feral cats (*Felis domesticus*), feral dogs (*Canis familiaris*), feral swine (*Sus scrofa*), gray fox (*Urocyon cinereoargenteus*), gray squirrels (*Sciurus carolinensis*), mink (*Neovison vison*), muskrats (*Ondatra zibethicus*), nine-banded armadillos (*Dasypus novemcinctus*), raccoons (*Procyon lotor*), red fox (*Vulpes vulpes*), striped skunks (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), white-tailed deer (*Odocoileus virginianus*), and woodchucks (*Marmota monax*).

WS prepared an EA (WS EA) to evaluate the need for action to manage damage associated with mammals, the potential issues associated with managing damage, and the environmental consequences of conducting different alternatives to meet the need for action while addressing the identified issues. WS defined the issues associated with meeting the need for action and identified preliminary alternatives through consultation with the Georgia Department of Natural Resources. WS issued a finding of no significant impacts (FONSI) on January 19, 2017. Because of TVA's involvement with WS concerning mammal damage control and management in Georgia, TVA independently reviewed the WS EA, provided comments to WS, and found it to be adequate. TVA is therefore adopting the WS EA.

TVA continues to experience damage and threats of damage associated with mammals at facilities or properties they own or manage in Georgia. If needed, the TVA could request further assistance from WS to manage damage or threats of damage at those facilities and properties.

### **Alternatives**

The WS EA evaluated the potential environmental consequences under three alternatives. Alternative 1 would continue the current implementation of an adaptive methods approach utilizing non-lethal and lethal techniques, when requested, as deemed appropriate using the WS Decision Model, to reduce damage and threats caused by mammals in Georgia. Alternative 2 would limit WS's involvement to providing recommendations on methods that people could use to manage damage without any direct involvement by WS. Under Alternative 3, the WS program in Georgia would not provide any assistance with managing damage associated with mammals in the State.

### **Impacts Assessment**

Issues related to wildlife damage management were initially identified and defined during the development of the 1997 USDA programmatic EIS. The following issues were within the scope of the analysis of the EA:

- Issue 1 - Effects of damage management activities on target mammal populations;
- Issue 2 - Effects on non-target wildlife species populations, including threatened and endangered species;
- Issue 3 - Effects of damage management methods on human health and safety;
- Issue 4 - Effects of mammal damage management activities on the aesthetic value;
- Issue 5 - Humaneness and animal welfare concerns of methods;
- Issue 6 - Effects of beaver removal and dam manipulation on the status of wetlands in the State

### **Issue 1 - Effects of Damage Management Activities on Target Mammal Populations**

WS personnel could employ non-lethal and/or lethal methods to resolve a request for assistance. Non-lethal methods consist of capturing, dispersing, excluding, or making an area unattractive to mammals causing damage. Lethal methods can remove specific mammals that personnel of WS identify as causing damage or posing a threat to human safety. Neither method would adversely affect the populations of the target species under any of the alternatives.

### **Issue 2 - Effects on Non-Target Wildlife Species Populations, Including Threatened and Endangered Species**

To reduce the likelihood of dispersing, capturing, or removing non-target animals, WS would employ the use of attractants that were as specific to the targeted species as possible. WS would use standard operating procedures to reduce any potential adverse effects on non-target animals. These methods are “*not likely to adversely affect*” threatened or endangered species or their designated critical habitats in the State. USFWS concurred with the effects determination made by WS during consultation. This applies to all alternatives.

### **Issue 3 - Effects of Damage Management Methods on Human Health and Safety**

WS’ employees would consider risks to human safety when conducting available methods of managing damage caused by mammals. The type of wildlife species responsible for causing damage or threats and WS’ directives would also be considered. The threats to human safety from the use of methods would be similar across the alternatives.

### **Issue 4 - Effects on the Aesthetic Values of Mammals**

Mammals may provide aesthetic enjoyment to some people in the State, such as through observations, photographing, and knowing they exist as part of the natural environment. Methods available WS could use under each alternative could result in the dispersal, exclusion, live-capture, or lethal removal of individuals or small groups of mammals to resolve damage and threats. However, these methods would not reach a magnitude that would prevent ability to view mammals outside the area where damage was occurring. The aesthetic values of mammals would be minimal across the alternatives.

### **Issue 5 - Humaneness and Animal Welfare Concerns of Methods**

The EA also analyzed the issue of humaneness and animal welfare concerns in relationship to methods available under each of the alternatives. The ability of WS to provide direct operational assistance under Alternative 1 would ensure WS’ personnel employed methods as humanely as possible. Under the other alternatives, other entities could use methods inhumanely if used inappropriately or without consideration of target animal behavior. However, the skill and knowledge of the person implementing methods to resolve damage would determine the efficacy and humaneness of methods.

### **Issue 6 - Effects of Beaver Removal and Dam Manipulation on the Status of Wetlands in the State**

When receiving a request for assistance to manage damage associated with beaver, WS could also receive requests to remove or manipulate beaver dams to alleviate flooding. Under Alternative 1, WS could manipulate water levels associated with water impoundments caused by beaver dams using either dam breaching, dam removal, or the installation of water flow devices, including exclusion devices. If wetland conditions were present at the site, WS’ employees would notify the entities requesting assistance from WS that a permit under section 404 of the Clean Water Act (CWA) might be required to remove/breach the dam. WS would recommend the property owner or manager seek guidance from the Georgia Department of the Environmental Management and the United States Army Corps of Engineers pursuant to Georgia State Law and CWA.

### **Cumulative Impacts of the Proposed Action**

No significant cumulative environmental impacts are expected from any of the four alternatives, including TVA and WS’s preferred alternative (Alternative 1). The analysis in the EA adequately addressed the identified issues,

which reasonably confirmed that an integrated methods approach would not result in significant cumulative adverse effects on the quality of the human environment

Based on the analyses in the EA, selecting Alternative 1 would best address the issues identified in Chapter 2 of the EA when applying the associated standard operating procedures discussed in Chapter 3 of the EA. Alternative 1 successfully addresses (1) managing damage using a combination of the most effective methods and does not adversely impact the environment, wetlands, property, human health and safety, target species, and/or non-target species, including threatened or endangered species; (2) it offers the greatest chance of maximizing effectiveness and benefits to resource owners and managers; (3) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health and safety; and (4) it offers a balanced approach to the issues of humaneness, animal welfare, and aesthetics when all facets of those issues are considered.

The preferred alternative contemplates that, for any request for assistance, WS will apply the Decision Model which assesses the problem, evaluates management methods available, and then formulates a management strategy and continues to monitor that strategy. Any decision made using the Decision Model would be in accordance with WS' directives and standard operating procedures as well as relevant laws and regulations. The WS EA states, "The monitoring of activities by WS would ensure the EA remained appropriate to the scope of activities conducted by WS in Georgia and damage management activities that WS could conduct on property owned or managed by the TVA under the selected alternative."

**Public Involvement**

WS made the EA available to the public for review and comment by a legal notice published in the Atlanta Journal and Constitution newspaper from November 7, 2016 through November 9, 2016. WS also made the EA available to the public for review and comment on the APHIS website on October 31, 2016 and on the regulations.gov website beginning on October 28, 2016. WS also sent a notice of availability directly to agencies, organizations, and individuals with probable interest in managing mammal damage in the State. The public involvement process ended on December 16, 2016. During the public comment period, WS received two comment responses on the draft EA resulting in minor changes, but did not change the analysis provided in the EA.

**Conclusion and Findings**

TVA has independently reviewed the WS EA, provided comments on the document, and found it to be adequate. TVA is therefore adopting the WS EA. Based on the analyses in the EA and the findings documented above, TVA concludes that conducting its own mammal damage management activities or contracting with WS for mammal damage management services on TVA facilities and properties in Georgia as described under Alternative 1 above would not be a major federal action significantly affecting the environment.

Accordingly, an environmental impact statement is not required.



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Date Signed