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

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (hereafter referred to as "WS"), conducts programs to resolve or prevent damage from animals to agricultural resources, natural resources, and property, including threats to human safety. USDA prepared the programmatic environmental impact statement (EIS) entitled "Animal Damage Control Program: Final Environmental Impact Statement (revised)" in 1997 to document the potential environmental consequences of such activities.

The Tennessee Valley Authority (TVA) contracts with WS to provide mammal damage management on TVA properties and facilities in Tennessee. TVA also owns or maintains electrical power substations and switching stations and the associated transmission lines and right-of-way easements in Tennessee. Further, TVA operates recreation areas throughout the State of Tennessee, including campgrounds, day-use areas, and boat launching ramps.

TVA proposes to continue to contract with WS for mammal damage management services on TVA facilities and properties including reservoir lands and property easements in Tennessee. Mammal damage and threats of damage at TVA facilities and properties have occurred primarily to property and pose threats to human safety. Woodchucks and armadillos burrowing into earthen levees and dikes used to impound water can compromise the integrity of the structures and threaten property and the safety of people downstream. Raccoons, opossums, foxes, coyotes, bobcats, feral cats, and feral dogs all reside on TVA lands. These animals frequently become overpopulated or lose their fear of humans, causing zoonotic disease transmission and aggressive behavior toward humans. Mammals that enter substations and power generation facilities can threaten the interruption of power by chewing on components or shorting out electrical circuits. Contracting with WS in Tennessee would meet TVA's needs for managing mammal damage, and the use of WS staff would be encouraged. On occasions when it may benefit TVA to perform this work independently, contingent on site specific reviews, TVA staff would use the same method(s) as WS. These methods are described in Appendix B of the attached WS environmental assessment (EA).

WS prepared an EA to document the potential environmental effects of continuing its mammal damage management activities in the state of Tennessee and issued a finding of no significant impacts (FONSI) on December 12, 2012. That EA tiered from the 1997 USDA programmatic EIS. Because of TVA's involvement with WS concerning mammal damage control and management in Tennessee, TVA cooperated in the preparation of the EA. The WS EA is incorporated by reference.

### **Alternatives**

The WS EA evaluated potential environmental consequences under three alternatives. These include Alternative 1 - Continue the Current Adaptive Integrated Mammal Damage Management Program (Proposed/ No Action); Alternative 2 - Mammal Damage Management by WS through Technical Assistance Only; and Alternative 3 - No Mammal Damage Management Conducted by WS.

Under Alternative 1, the Proposed/ No Action, WS would continue its current mammal damage management program in Tennessee. This program consists of implementing an integrated damage management approach to resolve and prevent mammal damages and to reduce threats to human safety. WS would continue to respond to requests for assistance with, at a minimum, technical assistance, or when funding is available, operational damage management. Non-lethal methods would be given first consideration or implemented before recommending or implementing lethal methods. However, the most appropriate response could be a combination of non-lethal and lethal methods, or there could be instances where application of lethal methods alone would be the most appropriate strategy. Technical assistance provided under this alternative would be similar to technical assistance described under Alternative 2.

Under Alternative 2, WS would address every request with technical assistance only. Technical assistance would provide information and recommendations on mammal damage management that could be employed without direct involvement by WS. Those entities experiencing damage or threats of damage associated with mammals could employ methods recommended by WS, employ other methods, seek further assistance from other entities, or take no further action. Similar to Alternative 1, those methods described in Appendix B of the WS EA would be available except the use of Gonacon™, immobilizing drugs, and euthanasia chemicals.

Under Alternative 3, WS would not be involved with any aspect of mammal damage management in Tennessee. Technical assistance and operational damage management services would cease. Information on mammal damage methods would remain available through a variety of public and private sources. All requests for assistance would be referred to the Tennessee Department of Wildlife, Fisheries and Parks (MDWFP), and/or other appropriate entities. The only methods that would not be available to manage damage caused by mammals would be Gonacon™, immobilizing drugs, and euthanasia chemicals. Gonacon™ is not registered for use in Tennessee and if registered would only be available for use by the MDWFP. Immobilizing drugs and euthanasia chemicals would only be available for use by the MDWFP or appropriately licensed veterinarians.

Alternative 1, the Proposed/No Action, is TVA's preferred alternative.

### **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 on the aesthetic values of mammals;
- Issue 5 - Humaneness and animal welfare concerns of methods;
- Issue 6 - Effects of damage management activities on the regulated harvest of mammals.

Mammal damage management activities, as conducted by WS, are specific to the state of Tennessee and are not regional or national in scope. Implementing Alternative 1 would pose minimal risks to public health and safety. Risks to the public from the methods described in the EA were determined to be low. Therefore, mammal damage management methods available would not adversely affect human safety. The effects of the proposed activities are not highly uncertain and would not impose unique or unknown risks on the human environment. Mammal

damage management under Alternative 1 is effective for target species and would not adversely impact non-target species. It also offers a balanced approach to the issues of humaneness and aesthetics when all facets of those issues are considered.

The implementation of Alternative 1 would not adversely affect any species that are currently state or federally listed as threatened and endangered in Tennessee. The U.S. Fish and Wildlife Service has concurred with this determination. No impacts to cultural resources are anticipated from the implementation of Alternative 1. Implementing the Proposed/No Action would not significantly impact soils, geology, minerals, water quality, prime farmlands, floodplains, wild and scenic areas, wetlands or ecologically critical habitat. WS standard operating procedures and adherence to applicable laws and regulations would further assure that WS' activities do not harm the environment. No significant cumulative environmental impacts are anticipated from the implementation of Alternative 1.

### **Public Involvement**

A notice of availability and the EA were made available for public review and comment on the APHIS website. A letter of availability was also mailed directly to agencies, organizations, and individuals with probable interest in the proposed program. No comments were received during the public comment period.

### **Mitigation**

No specific non-routine environmental mitigation measures were identified by TVA to reduce potential environmental effects. Implementation of the best management practices described in the WS EA and FONSI will minimize the potential for adverse environmental effects.

### **Conclusion and Findings**

TVA has independently reviewed the WS EA 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 contracting with WS for mammal damage management services or conducting its own mammal damage management activities on TVA facilities and properties including reservoir lands and property easements in Tennessee 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