

**Finding of No Significant Impact Asian Longhorned Beetle Eradication Program in
Clermont County, Ohio**

**Revised Environmental Assessment
May 2013**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) prepared a revised environmental assessment (EA) for eradication of Asian longhorned beetle (ALB) from Clermont County, Ohio. The revised EA is incorporated into this Finding of No Significant Impact (FONSI) by reference and is available at the APHIS website at
or from-

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The draft EA for Clermont County that was made available to the public for comment in May 2012 was prepared because the September 2011 EA for ALB eradication activities in Clermont and Brown Counties considered only two alternatives: (1) no action by APHIS, and (2) to cut down and remove infested trees to prevent further spread of ALB. However, because APHIS is considering other tools and strategies in addition to the removal of infested trees, four alternatives were evaluated for eradication of ALB in Clermont County in a May 2012 draft EA. That EA was prepared and made available to the public for a 60-day public comment period beginning on May 9, 2012, on the APHIS web site at .
Notice of the availability of that EA was published in several local newspapers, including legal notices and articles, post cards to residents, fact sheets, an opinion editorial and factsheet in the Clermont Sun, a television media tour with APHIS officials in May, website and social media posts through Facebook and Twitter accounts, distribution through email channels, and an informational meeting held on June 19, 2012. APHIS received more than 250 comments on the EA. However, after considering the comments received, APHIS revised the EA. The revised EA reflects important changes made to the May 2012 version, including the identification of a preferred alternative and a more detailed explanation of that alternative. Responses to comments from the EA were included in the revised EA (Appendix G). The revised EA was made available to the public for a 30-day public comment period beginning on January 16, 2013, on APHIS' web site. A notice of availability for the revised EA was published in local newspapers and an informational meeting was held during the comment period to solicit comments and discuss the revised EA. The public comment period ended on February 16, 2013. APHIS received approximately 107 comment letters via regular mail, email, and at the informational meeting held on February 11, 2013. The responses to those comments are included in appendix F of the revised EA.

Alternative D described in the revised EA was identified as the preferred alternative for the ALB Cooperative Eradication Program in Clermont County, OH. Alternative D includes maintaining the current ALB quarantine and adding new areas to it if additional ALB-infested areas are discovered within the county. APHIS will remove infested trees and use a combination of tree removal and chemical treatment of high risk host trees up to a radius of a ½ mile of known infestations. APHIS will implement this adaptive management strategy for managing high risk host trees as a means of providing flexibility in the program and responding to infestations on a site-specific basis. Conditions such as host tree density and distribution, insecticide efficacy, environmental conditions, and logistical constraints require a non-prescriptive approach to managing high risk host trees. This approach with ALB eradication is similar to strategies that have been implemented for other infestations in the United States. Recommendations from the program regarding chemical treatment or removal of high risk host trees will be made to landowners who have the right to refuse removals or treatment. In those instances APHIS will continue survey activities and remove trees if they become infested.

The analysis in the revised EA regarding impacts from alternative D suggests that significant impacts to human health and the environment would not be expected. While isolated areas of concentrated tree removal may occur, logistical constraints regarding removal suggests that the total number of trees that could be removed per year is small relative to the remaining number of trees within the quarantined area and county. The number of impacted trees from removal would be expected to decrease even further over time as infestations are identified and eradication strategies are implemented, reducing the spread of ALB. This would also apply to the amount of pesticide use proposed under the preferred alternative. The number of trees that can be treated is approximately ten times the number that can be removed each year. The proposed use pattern for each pesticide as well its fate and toxicity, as discussed in the revised EA, suggest that significant impacts to the environment would not be anticipated.

Impacts of tree removal or imidacloprid applications on wood products, hunting, wildlife, forests, parks, firewood, and residential trees are not expected to be significant because of the limited number of host trees that can be treated or removed compared to the total number of trees in Clermont County, and because the program has the flexibility to choose the most appropriate treatment of high risk host trees depending on site-specific characteristics. Also, under the preferred alternative, APHIS will evaluate opportunities to conduct surveys and control activities more efficaciously by targeting highly preferred hosts such as *Acer* (maple and box elder); *Aesculus* (horse chestnut); *Salix* (willow); *Ulmus* (elm); and *Betula* (birch).

Impacts of imidacloprid and tree removal on air, water, and soil quality are not expected to be significant. The low number of trees that would be removed relative to the total number available, the small incremental improvement in air quality from trees in large urban areas, and the replanting of areas with grass and non-ALB host trees would not result in significant negative impacts to air quality parameters (e.g., particulate matter and other pollutants) within the current quarantine or Clermont County. Under the preferred alternative, removal of high risk host trees


would be limited in areas where soil is erodible, and with the implementation of best management practices would reduce impacts to soil and water and would not be expected to result in significant watershed impacts.

Impacts from the use of the herbicides used by the program are not significant. The potential for off-site movement via drift or runoff is very small as it would only be applied by hand sprayer or painted directly on the stumps of cut host material.

APHIS has consulted with the U.S. Fish and Wildlife Service and has determined that the preferred alternative may affect, but is not likely to adversely affect threatened and endangered species or designated critical habitat in Clermont County. In addition, implementation of recommendations from the U.S. Fish and Wildlife Service will protect bald and golden eagles and migratory birds.

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." APHIS will continue to coordinate with the Ohio State Historic Preservation Office to ensure the program will have no impact to historic properties, including sites of tribal importance, pursuant to Section 106 of the National Historic Preservation Act.

I have determined that there would be no significant impact on the quality of the human environment from the implementation of the preferred alternative. APHIS' finding of no significant impact from the preferred alternative is based on past experience with ALB eradication efforts, additional information received during the comment period, and the evaluation of potential impacts to human health and the environment analyzed in this EA. Lastly, because I have not found evidence of significant environmental impact associated with the proposed program, I further find that no additional environmental documentation needs to be prepared and that the program may proceed.



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5-1-13

Date