United States Department of Agriculture

Marketing and Regulatory Programs

Animal and Plant Health Inspection Service

Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area

Environmental Assessment
May 2007

Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area

Environmental Assessment
May 2007

Agency Contact:
Christine Markham
National Program Director
USDA, APHIS, PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

Table of Contents

I. Introduction

After the discovery, in 1996, of Asian longhorned beetles (*Anoplophora glabripennis*) (ALB) on several species of hardwood trees in Brooklyn, New York, the Secretary of Agriculture declared an emergency in order to combat the infestation with regulatory and control actions. ALB is believed to have been introduced into the United States from wood pallets and other wood packing material accompanying cargo shipments from Asia. The native range of the ALB includes China and Korea.

The initial beetle infestation in Brooklyn, New York, spread to Long Island, Queens, and Manhattan. In 1998, a separate introduction of the beetle was discovered on trees in Chicago, Illinois, and subsequently in surrounding suburbs. Beetles were also detected in two separate New Jersey locations—in Jersey City in 2002 and in Middlesex/Union counties in 2004. More recently it has been found in Richmond County, New York (Staten Island), across the Arthur Kill River from the Middlesex/Union Counties infestation. Currently, USDA–APHIS' Plant Protection and Quarantine (PPQ) is implementing quarantine and control strategies in New York, Illinois, and New Jersey that seek to eradicate this serious pest from the United States. The Illinois quarantine was removed in 2006 since no infested trees have been detected since 2003 (IDA, 2006). Eradication is projected in Illinois for 2008.

A. Biology

The ALB is classified in the wood boring beetle family, Cerambycidae. Adults are 1 to 1 ½ inches in length with long antennae and are shiny black with small white markings on the body and antennae. After mating, adult females chew depressions into the bark of various hardwood tree species in which they lay (oviposit) their eggs. The host trees that the ALB infests include: maple and box elder, elm, horsechestnut, willow, birch, poplar, ash, London plane and sycamore, European mountain ash, mimosa (silk tree), and hackberry.

Once the eggs hatch, small white larvae bore their way through the bark into the tree, feeding on the sensitive vascular layer beneath. The larvae continue to feed deeper into the tree's heartwood forming tunnels, or galleries, in the trunk and branches. This damage weakens the integrity of the tree and will eventually kill it if the infestation is severe enough. Heavy sap flow may occur from the damaged sites on the tree caused by the larval tunneling and feeding. Sawdust debris (or frass) is commonly found on the base of afflicted trees as well.

Infested trees are also prone to secondary attack by other diseases and insects.

Over the course of a year, a larva will mature and then pupate near the surface of the tree, under the bark. From the pupa an adult beetle emerges, chewing its way out of the tree, forming characteristic round holes approximately 3/8ths of an inch in diameter. The emergence of beetles typically takes place from June through October with adults then flying in search of mates and new egg-laying sites to complete their life cycle.

B. Purpose and Need

APHIS has responsibility for taking actions to exclude, eradicate, and/or control plant pests, including Asian longhorned beetle, under the Plant Protection Act (7 United States Code (U.S.C.) 104). APHIS has been delegated the authority to administer this act and has promulgated Quarantines and Regulations (7 Code of Federal Regulations (CFR) 319) which regulate the importation of commodities and means of conveyance.

The current exclusion and eradication program consists of various regulations designed to require treatment of wood articles and packing materials to eliminate ALB. The approach has been effective at preventing new infestations from imported wood items. Eradication and containment of existing populations is difficult and expensive. Effective elimination of the beetle by removal of infested host plants depends upon early detection, timely identification of infestations in trees, and cutting the host trees within a defined radius around any infested tree before the beetle can disperse farther. Small infestations that are detected early may be eradicated relatively easily, but several small infestations in a localized area are more difficult to eliminate, as are infestations that have gone undetected and untreated for several years. In addition to cutting and removal of host trees within a defined radius around an infested tree, the program also employs chemical methods to prevent infestation of healthy trees from adult beetles, thereby preventing further dispersal of the infestation.

This environmental assessment (EA) considers the potential environmental impacts of the Asian Longhorned Beetle Cooperative Eradication Program in the New York metropolitan area (as defined by the Census Bureau as the New York, Northern New Jersey, Long Island area—New York, New Jersey, Connecticut, Pennsylvania). This EA has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321–4327) and it's implementing regulations.

APHIS has prepared three other EAs that are relevant to this current EA: Asian Longhorned Beetle Control Program (December, 1996), Asian Longhorned Beetle Program (February, 2000), and Asian Longhorned Beetle Cooperative Eradication Program, Hudson County, New Jersey (March, 2003). This current EA is tiered to the three previous EAs, and, thereby, incorporates the analysis in the other EAs by reference.

II. Alternatives

This EA analyzes the potential environmental consequences associated with the proposed action to eradicate ALB from the New York metropolitan area. Two alternatives are being considered: (1) no action by APHIS to treat new infestations of ALB in the New York metropolitan area, and (2) the preferred alternative which includes quarantine, cutting of ALB host trees within a defined area followed by chipping or burning, and chemical injections of soil or host trees outside the cutting and chipping or burning zone in any new areas within the New York metropolitan area where ALB has been detected.

A. No Action

Under the no action alternative, APHIS would continue to implement the quarantine restrictions in areas as defined in 7 CFR 301.51–3. Surveys and treatments of these areas would continue; however, any new ALB finds, including the recent find in Richmond County, New York, would not be treated by APHIS. Some control measures could be taken by other Federal or non-Federal entities; however, these measures would not be controlled or funded by APHIS.

B. Preferred Alternative

Under the preferred alternative, APHIS, in cooperation with the States within the New York metropolitan area, would implement an eradication program to rid ALB from any new finds in the New York metropolitan area, including Richmond County, New York. The eradication program will consist of adding any new areas to the ALB quarantine area, cutting ALB host trees within a defined area followed by chipping or burning, and treating soil or host trees within a certain zone with imidacloprid.

The ALB eradication program is an adaptive management program that is based upon the strategic plan that was developed by APHIS and its cooperating partners in 2005 (APHIS, 2005). As experience dictates, the need for minor changes in the program can be incorporated to maximize the effectiveness of the eradication efforts

without having to complete extensive environmental documentation. If, however, the changes are not minor, such as a change in chemicals or use of a different technology, additional environmental documentation will be required.

The current quarantine restricts the movement of firewood, green lumber, and other living, dead, cut, or fallen material including nursery stock, logs, stumps, roots, and branches from potential host trees. These articles may not move outside the quarantine zone unless they are issued a certificate by an APHIS or State cooperating inspector. The new area in Richmond County would add approximately 8-square miles to the current quarantine zone. If additional new finds of ALB are made, areas around them will also be quarantined.

Surveys are made of all host trees within a designated area of an infested tree to insure that they are not infested with ALB. Control actions include host removal, destruction through chipping or burning, and chemical treatments. A radius will be defined for the area of cutting and chemical treatment. ALB host trees located closest to an ALB find will be cut and either chipped or burned. Chemical treatments will be used in areas outside this cutting and chipping or burning area. Destruction through chipping must ensure that the chips are to a size that kills the beetle or beetle larvae. Chemical treatments with imidacloprid are made through direct injection either into the tree trunk or into the soil immediately surrounding the tree. The rate of imidacloprid depends on the application as well as the diameter (measured as diameter at breast height (dbh)) of the host tree.

The designated area is defined according to the ability of ALB to spread in the area. This can vary depending on the percentage of host trees in the area and density of trees. Treatment options may vary depending on the environmental conditions in the area of an ALB find (i.e., soil composition, density of trees, and so on).

The proposed eradication efforts in parts of Staten Island will be limited to direct trunk chemical injections due to concerns of runoff that may occur in the sandy soil. In addition, given the low density of trees in the area and the percentage of host trees (40 percent), a defined radius of 0.5 miles from an infested tree was determined for the cutting zone and 0.5- to 1-mile defined radius from an infested tree was designated for chemical treatment.

III. Environmental Impacts

A. No Action

Environmental impacts from the no action alternative are related to the damage caused by the establishment and spread of ALB. The potential establishment would cause damage to and loss of valuable ornamental and commercial trees, as well as nautralized and forested areas. If ALB were allowed to spread to other parts of the country, it could result in damage to commercial trees as well as their tree products, such as maple syrup and hardwood lumber.

The wide distribution of host plants suggests the danger of ALB spread across much of the country with increases in damage and losses commensurate with the spread. The damage and losses could result in reduction of private property value. There would be changes in composition and age structure of forests which could have long-term effects on the ecological relationships in the naturalized and forested areas.

As ALB continues to spread, other Federal agencies or non-Federal entities may try to control or eradicate ALB through the use of chemical treatments. There are elevated environmental risks from uncoordinated application of pesticides to limit the damage from ALB.

B. Preferred Alternative

Under the preferred alternative, areas found to have ALB will be quarantined and treated using cutting and chemical treatments. The quarantine itself will have no environmental effects, although it can limit industry that relies on transporting host trees and their products outside the quarantine zone. However, this limit does not outweigh the risks to industry if ALB is allowed to establish and spread into new areas.

The cutting (removal) of susceptible host plants within a defined radius of an ALB find may have adverse effects on local wildlife that depend on vegetation for food, cover, and related needs. This is particularly true for some invertebrates and other animals that have a limited foraging range. The primary issue to humans from loss of plants is aesthetic. The impacts on environmental quality from the removal of host trees are expected to be negligible. Only trees that are known to be hosts for ALB will be tagged for cutting and chipping or burning. This will limit the environmental effects of the cutting area.

The use of imidacloprid to treat host trees within a defined radius outside the cutting and chipping or burning area from an ALB find was examined in the February, 2000 and March, 2003 Asian longhorned beetle EAs. These EAs discussed the toxicity data, environmental fate and exposure, and risk of adverse effects to the environment (USDA, 2000; USDA, 2003). The method of direct injection into the trunk of the tree or soil application of imidacloprid is not expected to volatilize into the atmosphere, leach into the groundwater, or be carried to surface water. Only host trees will be treated and there will be no harm to these trees with the injection itself. The soil and plant residues are expected to remain active for up to 1 year to protect the trees from infestation.

Nontarget insects that feed on treated trees and are directly exposed to imidacloprid would be expected to decrease temporarily until the residues decrease and recolonization occurs from surrounding areas. Reduction in insects may require insectivores to forage farther; however, this increase in forage effort is not expected to be significant because only susceptible trees will be treated. Non-host plants will not be treated and neither will aquatic areas; therefore, reduction of insect forage should be limited.

Human health effects associated with the administration of imidacloprid will be mitigated through the adherence to pesticide label requirements and standard operating procedures. The required protective gear and safety precautions minimize exposure. A more detailed evaluation of human exposure can be found in the February, 2000 and March, 2003 EAs.

Cumulative effects based on the preferred alternative are not anticipated. The effects from the quarantine, cutting, and chemical treatments are short-lived (USDA, 2003). In addition, the use of imidacloprid under the preferred action is not expected to result in accumulation in the soil, water, or the tree itself.

C. Threatened and Endangered Species

The endangered shortnose sturgeon is the only federally listed endangered or threatened species in the area. It is found in the Hudson River from the southern tip of Manhattan (at river mile 0) upriver to the Federal Dam at Troy (river mile 152). It is not found in the waters of Richmond County, New York (Staten Island); therefore, there is no effect from the proposed ALB eradication program in Richmond County to any endangered or threatened species. If another infestation of ALB were to be found in the New York metropolitan area and listed species could be impacted before an eradication program were put into

place, APHIS would work with the U.S. Fish and Wildlife Service to ensure compliance with the Endangered Species Act.

D. Other Considerations

Executive Order (EO) 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations," focuses Federal attention on the environmental and human health conditions of minority and low-income communities and promotes community access to public information and public participation in matters relating to human health or the environment. This EO requires Federal agencies to conduct their programs, policies, and activities that substantially affect human health or the environment in a manner so as not to exclude persons and populations from participation in or benefiting from such programs. It also enforces existing statutes to prevent minority and low-income communities from being subjected to disproportionately high or adverse human health or environmental effects. The environmental and human health effects from the proposed applications are expected to be minimal and are not expected to have disproportionate adverse effects to any minority or low-income family.

EO 13045, "Protection of Children from Environmental Health Risks and Safety Risks," acknowledges that children, as compared to adults, may suffer disproportionately from environmental health and safety risks because of developmental stage, greater metabolic activity levels, and behavior patterns. This EO (to the extent permitted by law and consistent with the agency's mission) requires each Federal agency to identify, assess, and address environmental health risks and safety risks that may disproportionately affect children. The program applications are made directly to trees which may occur in parks and residential areas where children would be expected to play and climb trees; however, the program applicators ensure that the general public is not in or around areas being treated, so no exposure will occur for trunk or soil injection applications. Therefore, no disproportionate effects on children are anticipated as a consequence of implementing the preferred alternative.

IV. Listing of Agencies and Persons Consulted

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Emergency and Domestic Programs
4700 River Road, Unit 137
Riverdale, MD 20737

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Environmental Compliance
4700 River Road, Unit 150
Riverdale, MD 20737

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Environmental Services
4700 River Road, Unit 149
Riverdale, MD 20737

USDA–APHIS–PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

V. References

IDA—See Illinois Department of Agriculture

Illinois Department of Agriculture, 2006. Gov. Blagojevich Proclaims July 12 Asian Longhorned Beetle Deregulation Day. July, 2006. Springfield, IL.

USDA—See United States Department of Agriculture

United States Department of Agriculture, Animal and Plant Health Inspection Service, 1996. Asian Longhorned Beetle Control Program. December, 1996. Riverdale, MD

United States Department of Agriculture, Animal and Plant Health Inspection Service, 2000. Asian Longhorned Beetle Program. February, 2000. Riverdale, MD

United States Department of Agriculture, Animal and Plant Health Inspection Service, 2003. Asian Longhorned Beetle Cooperative Eradication Program Hudson County, New Jersey. March, 2003. Riverdale, MD

Finding of No Significant Impact
Asian Longhorned Beetle Cooperative Eradication Program
in the New York Metropolitan Area
Environmental Assessment
May 2007

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), has prepared an environmental assessment (EA) for eradication of Asian longhorned beetle (ALB) from the new site in Richmond County and for any additional sites in the New York metropolitan area where ALB may be found in the future. The EA is available from:

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Plant Protection and Quarantine
Surveillance and Emergency Programs
Planning and Coordination
4700 River Road, Unite 137
Riverdale, MD 20737–1229

The EA analyzed two alternatives: no action alternative and the preferred alternative. The preferred alternative specifies any new area would be added to the quarantine area. In addition, the preferred alternative calls for control activities that include removal and chipping or burning of ALB host trees in the immediate vicinity of a new find, and ALB host trees within a certain zone would be treated with either a chemical trunk injection or chemical soil application of imidacloprid. Control activities for the new find in Richmond County will consist of host removal and chipping of all host trees found within 0.5 miles of the ALB find, and trunk injection with imidacloprid of all host trees found from 0.5 to 1 mile from the ALB find. Based on the analysis in the EA, I have selected the preferred alternative of quarantine, removal, and chemical trunk injection because of the feasibility to implement the program to meet the pest eradication objectives and it provides lower overall risk to human health and the natural environment than the no action alternative.

APHIS considered the potential environmental consequences of each alternative in the EA. Based on this analysis, APHIS has 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 treatments in the New York metropolitan area, the application of standard operating procedures for the applications, and the expected environmental consequences, as analyzed in the EA. APHIS will continue to evaluate and consult, where appropriate, with the U.S. Fish and Wildlife Service to ensure that this program will have no adverse effects on endangered and threatened species if ALB is found in any new areas in the future.

In addition, I find the preferred alternative of expanding the quarantine area, removal and chipping or burning of host trees, and chemically treating host trees with either a soil application or trunk injection to be entirely consistent with the principles of environmental justice as expressed in Executive Order 12898. Implementation of the preferred alternative will not result in any disproportionately high adverse human health or environmental effects on any minority populations and low-income populations. In addition, the preferred alternative is consistent with

Executive Order 13045 "Protection of Children from Environmental Health Risks and Safety Risks." There will be no disproportionate effects to the environmental health and safety of children with the implementation of this program. Lastly, because I have not found evidence of significant environmental impacts associated with the proposed program, I further find that an environmental impact statement does not need to be prepared and that the program may proceed.

Christine Markham
National Asian Longhorned Beetle Program Director
Plant Protection and Quarantine
Animal and Plant Health Inspection Service

05/22/2007
Date

United States Department of Agriculture

Animal and Plant Health Inspection Service

4700 River Road
Unit 137
Riverdale, MD
20737

August 7, 2007

Subject: Response to comments received regarding the "Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area" Environmental Assessment

To Whom It May Concern:

We solicited comments from the public regarding an Environmental Assessment entitled "Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area" dated May 2007. The comment period closed on June 23, 2007, and four people submitted comments on the document. Their comments and APHIS' response to the comments are attached. As the signatory of the Finding of No Significant Impact (FONSI) associated with the Environmental Assessment, I have read the comments as well as APHIS' response. I believe that the response addresses all significant issues raised. I have determined that there is no need to revise the Environmental Assessment and therefore reaffirm the FONSI signed on May 22, 2007.

Sincerely,

Christine Markham
National ALB Program Director

Response to Comments Received Regarding the May 2007 Environmental Assessment, "Asian Longhorned Beetle Cooperative Eradication Program in the New York Metropolitan Area"

Issue: Potential impact of program activities on wading bird populations.

One commenter indicated that Asian Longhorned Beetle (ALB) host tree removal could impact wading bird populations. USDA-APHIS is aware of the sensitive nature of wetland communities as well as the bird populations that they support; however, the risk of doing nothing with regards to the ALB infestation on Staten Island has a much greater threat to wading bird populations than the preferred alternative of host removal, preventative treatment, and survey. If left uncontrolled, ALB could weaken and destroy millions of host trees in the New York Metropolitan Area.

The Environmental Assessment recognized that there is the potential to impact wading bird populations in the host tree removal area. However, the currently affected area on Staten Island is relatively small and localized effects on some birds should not have a significant effect on wading bird populations in the Metropolitan Area. The New York State Department of Environmental Conservation agreed that immediate action is needed in the infested area to prevent ALB populations from spreading and issued an Emergency Authorization for work in the wetland areas on Staten Island. As part of this authorization, APHIS was made aware of the significant wildlife areas and agreed to have on call a NYS-licensed wildlife rehabilitator or veterinarian "to assure compliance with state and federal wildlife and migratory bird regulations." APHIS believes that this should minimize the risk to birds in the affected area while preventing the spread of ALB, which would ultimately affect many more birds.

Issue: Survey and preventative treatments should be increased.

A commenter suggested that APHIS take a proactive approach to ALB and increase survey areas as well as preventative treatments. The Environmental Assessment specifies work to be conducted within a particular radius around infested trees, which is based on the best scientific knowledge currently available. APHIS believes that this is adequate to control the ALB infestation on Staten Island. Most of the resources for the program are applied to the eradication effort described in the Environmental Assessment, however less intensive survey efforts continue for up to 25 miles from infested trees. This effort is not detailed in the EA since survey has no adverse environmental impacts. In addition APHIS is working with the public and citizen's groups to raise awareness of ALB and to develop ways that they can work cooperatively with the eradication program. These programs will continue to expand as groups contact APHIS with their interest in the program.

An increase in preventative treatments could reduce future infestations; however, the treatment protocols balance the best science with the resources available. Preventative chemical treatments are costly in terms of funding and labor. APHIS feels that the current treatment regime is adequate to prevent the beetle from spreading from known infested areas, and the treatment radius is based on the dispersal biology of the beetle. Conducting additional preventative

chemical injections beyond this radius would result in treatments occurring in areas where the best available science indicates that the beetle is unlikely to be found, essentially wasting the resources of the program and taxpayer money. Although the beetle could still be found in these areas due to invasion from unknown infested areas, it is impossible to anticipate and target resources against unknown infestations.

Issue: Apparent lack of justification for the size and scope of the eradication program.

Two commenters questioned the justification for the program and the potential for significant effects. According to the implementing regulations for the National Environmental Policy Act, an Environmental Assessment is designed to be a "concise public document" with "brief discussions" rather than a detailed analysis of ALB and the options for controlling it. The Environmental Assessment incorporated by reference over ten years worth of experience in controlling the pest. This includes the consideration of best available national and international peer-reviewed scientific studies of ALB biology and control and of the pesticides and the techniques used to apply them. After analysis of the potential risks to the environment, forest health, and forest resources, APHIS determined that control and eradication of ALB was of national significance and could be done with minimal risk to human health and the environment. The current control program on Staten Island is the culmination of this work. APHIS continues to investigate new methods for eradicating ALB. But at the current time, an integrated approach including survey, chemical treatment, host removal, regulatory action, and public outreach is the most effective strategy to ensure eradication.

One commenter references a top APHIS scientist referring to the control program as a 'crapshoot', but this is taken out of context. The scientist was questioned as to whether or not the control program was certain to eradicate ALB. When dealing with the extirpation of organisms from the environment, certainty is rarely guaranteed. The current program is APHIS' best science-based effort to eradicate the beetle while minimizing adverse environmental impacts. To the extent that no one knows, or can know, the extent of the infestation on Staten Island, there is no guarantee that ALB will not be found in other locations on Staten Island or other areas in the future. Based on the best scientific knowledge and surveys to date, it is believed that the current program provides the best opportunity at eradicating ALB.

One commenter notes concern with potential significant effects from "cutting a .5 mile swath" of trees to control ALB. The eradication program does not remove all trees within a 0.5 mile radius of an infested tree, but only trees that ALB uses as a host. APHIS estimates that this would result in the cutting of 40% of the trees in the removal area. APHIS also recognizes that there may be an impact on organisms that use those trees for food, cover, and other needs. However, if no action is taken on the current infestation on Staten Island, there is little doubt that the insect will spread, ultimately resulting in the destruction of millions of trees rather than the thousands that are in the current control area. APHIS does not take the removal of these trees lightly and is working cooperatively with New York State Department of Agriculture and Markets, New York State Department of Environmental Conservation, the New York City Department of Parks and Recreation, and other local and state government agencies to minimize the potential effects of the program. A 14-point plan is detailed in the Emergency Authorization granted by the New York State Department of Environmental Conservation to work in the area which will minimize

the potential impact to wildlife, naturally vegetated areas, wetland, water bodies, and other natural resources. While a program of this scope is bound to have some impact on the environment, every level of government is working together to ensure that they are not significant.

Issue: The public was not involved in the planning process.

Two commenters expressed concern with public involvement and outreach. The National Environmental Policy Act implementing regulations require public involvement but do not detail or provide exact specifications on how this should be done. At least three public meetings were held prior to the start of eradication activities on Staten Island in order to describe the program and to answer questions. Articles describing the ALB program were printed in the *New York Times* and *Staten Island Advance*. NY1 cable news broadcast a story on ALB and the eradication activities. Public notice of the Environmental Assessment was made in the *Staten Island Advance*. General public outreach to raise general awareness of ALB was conducted with mailers and newspaper advertisements. Homeowners with host trees in the removal area are all contacted ahead of time and their written consent is required prior to tree removal. APHIS feels that all of these avenues provide for sufficient public involvement with the program, and we welcome additional ways to cooperate with individuals and groups interested in the ALB program.

Issue: Eradication does not include reforestation of removed host trees.

Several commenters were concerned that there were no plans for reforestation of areas where host trees are removed. APHIS does not have formal plans for reforestation and funding for such activities is uncertain. As a result, reforestation was not included as an action in the Environmental Assessment. However, APHIS has worked and is working cooperatively with other federal and state agencies on reforesting host-removal areas. In the past, APHIS worked with the U.S. Forest Service to replace removed trees with non-host trees, which has resulted in the replanting of over 10,000 trees in the New York Metropolitan Area. The Forest Service also assists affected communities and neighborhoods recover from the loss of their trees with seed money (pending availability) for replacement of trees as well as direct technical assistance and information programs directed towards the selection, care, and maintenance of trees. APHIS is also working with the New York City Department of Parks and Recreation with regards to replanting in the Staten Island treatment area. While APHIS cannot guarantee that all removed trees will be replaced, efforts are underway at several levels of government for reforestation of the host-removal areas.

Issue: There is no justification for the size of the host removal area and it should be reduced.

Several commenters felt that the 0.5 mile radius for tree removal around infested trees was too large and not justified. As noted above, Environmental Assessments are designed to be concise rather than detailed documents, and often incorporate material by reference. The details on size of the host removal and preventative treatment areas are in the references of the Environmental Assessment. In short, USDA Agricultural Research Service work on ALB dispersal and flight

ability and APHIS methods development analysis of detection and dispersal data in Chicago indicate that conducting control activities within 0.5 mile radius of an infested tree will encompass greater than 99% of the area in which adult beetles are likely to disperse. This allows the program to virtually assure eradication in areas known to be infested with ALB. Using a smaller cutting radius around known infested trees decreases the likelihood of removing other trees that may be infested by dispersed adult beetles. Unfortunately, it is very difficult to simply survey trees for infestation and remove only infested trees. Trees may be infested with ALB larvae and show little to no outward signs of this infestation. Even trained survey specialists are about 60% effective at visually inspecting a tree for infestation and there are no other non-destructive tools available to determine if a tree is infested with ALB. Based on tree species composition and host density within the current infested area of Staten Island, host-tree removal in a 0.5 radius around known infested trees and chemical treatments of host trees between the 0.5 mile to the 1.0 mile radius appears to be the most effective option available for successful eradication of ALB.

Natural Resources Protective Association

of Staten Island Inc.

P.O. Box 050328 Staten Island, NY 10305 (718) 987-6037

Established 1977

June 5, 2007

Christine Markham NPD, USDA APHIS, PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

Dear Ms. Markham

We are writing to address the "Finding of No Significant Impact" (FONSI) ALB Cooperative Eradication Program Metro Area Environmental Assessment May 2007, (EA) with a Publication Date on Staten Island of 5/23/07 and 5/24/07. Please note the published link to the documents is incorrect, and you have made no effort to amend the public notice. We understand there may be a meeting at Community Board 2 on 6/6/07, and it is not clear if APHIS will attend

While we understand the ALB is a significant harmful pest, we disagree with your assessment that the removal of 2,900 trees on Prall's Island in April 2007 and the ongoing removal of 7,900 trees at GATX / Maritime Forest is wholly necessary to control and eradicate the ALB.

Your preferred alternative seems to be singularly selected by you. While you do reference some consults, its clear that far more scientific input is needed, and that the wholesale destruction of thousands of trees may not be required.

The EA itself is faulty, there is *indeed* a significant impact when wholesale eradication is used: Cutting a .5 mile swath distorts the habitat of several hundred wading birds of the Harbor Herons program, including black crowned night herons, glossy ibis, great white herons, yellow crowned herons, little blue and great blue herons, black capped chickadees, and many more bird species. In addition, reptiles in the area like the black racer snake and Fowlers toad will get crushed by unwarranted mounds of destroyed trees falling on them. The mammals such as deer, red fox, and muskrat, are thrown into shock when mass destruction takes place. When trees are removed, the soil becomes unstable and unwarranted erosion and excessive sedimentation of wetlands and waterways does occur, impairing water quality.

This is your 1st foray into a natural area, and APHIS has failed in that there was little or no public outreach. The meeting at the Greenbelt Nature center was informative, and there was a presentation for Community Board 1 on 5/24/07, but aside from that you have failed to spell out the full scope and damages caused by your actions. Your top scientist referred to this as a 'crapshoot', this does not inspire any confidence in your actions.

At Pralls, to our knowledge, there was no meeting with the public, you consulted with Parks NRG and NYSDEC, and NYS Agriculture/Markets, but not with the public stakeholders, a violation of the stated Environmental Assessment policy that public outreach is occurring. Be advised we have little confidence that the agencies mentioned above are willing to state to you what the full effects of your actions are, but a FONSI is just incorrect . You need to do more surveillance, instead of chopping down 7,900 trees for 3 infected trees.

We certainly approve of more injections of imidacloprid, please expand its use. You have defined the .5 mile radius on your own; it doesn't seem to be based on sound science, and if the beetle flies 500 yards after leaving a host tree (after 6 years) it doesn't mean it will travel several miles .

We request an immediate cessation of all cutting activities, and expansion of the chemical treatment. We request that you prepare a full EIS as required under NEPA, because clearly the long term impact of ALB needs a full scoping process. In our opinion, although time may be tight, the way APHIS is conducting itself is not in the best interests of our region ,

We have significant problems with asthma and many other air borne particulates in our region, and wholesale destruction of trees is an adverse action that will hasten poor air quality, hurting our youth. There are no funds for reforestation at GATX, which is a violation of the stated EA. This is not acceptable. Please advise on reducing the cutting radius and immediate implementation of the EIS process. Thank you.

James Scarcella NRPA

CC: USDA APHIS
Plant Protection and Quarantine Surveillance and
Emer Programs Planning and Coordination
Ms. Wheat
4700 River Road, Unit 137
Riverdale MD, 20737-1229

All elected officials

NY NJ Baykeeper, A. Willner, B. McDonald

NYS DEC—J. Gilmore, S. Mattei

NYC DPR—W.Tai, A.Benape , T.Paulo

NSWCI, Protectors of Pine Oak Woods, Wild Metro, NYC Audubon, Sierra Club Media

The North Shore Waterfront Conservancy of Staten Island, Inc.
P.O. Box 140502
Staten Island, New York 10314

NSWC

June 11, 2007

COPY

Ms. Christine Markam, NPD, USDA APHIS, PPQ
ALB Eradication Program
920 Main Campus Drive, Suite 200
Raleigh, NC 27606

Dear Ms. Markam:

Enclosed you will find a copy of a letter written to Congressman Vito Fossella regarding Staten Island and the Asian Long Horn Beetle. Our organization is not in agreement with the way this insect was monitored, the lack of real public notification and comment period. As well as the loss of almost 11,000 native trees without there being a complete reforesting and restoration plan in place.

This is not a disaster made by nature but a man made disaster based on carelessness this makes it all the more unconscionable and sad. The laxness to which this was handle as if everything that was done was as an after thought is amazing and robs the residents of Staten Island of their right to Democracy, have we become a Totalitarian State?

Your agency must improve its monitoring system of predatory insects, animals, etc., adhere to a proper public notification period where residents are informed clearly and comprehensively, and residents must be allowed a proper comment period. And lastly your agency must come up with a better way of eradicating the ALB and similar types of insects, wildlife, fish, etc., that are harmful to our environment and to which our country has no known natural enemy to eliminate them.

Bottom line we are too smart of a people to behave in such a haphazard, mediocre fashion.

Thank you for your time and we look forward to hearing from you.

Sincerely,

Beryl A. Thurman, President
NSWC

CC: USDA APHIS, Plant Protection and Quarantine Surveillance and Emergency Programs Planning and Coordination, Ms. Wheat, NRPA, NY/NJ Baykeepers, MMC, SWC, PPOW, NSWC, SITA.

The North Shore Waterfront Conservancy of Staten Island, Inc.
P.O. Box 140502
Staten Island, New York 10314

June 11, 2007

Congressman Vito Fossella
13th District, New York
1239 Longworth House Office Building
Washington, DC 20515-3213

Dear Congressman Fossella:

On behalf of the members of the North Shore Waterfront Conservancy of Staten Island, Inc., we would like to express our concern regarding the monitoring, public notification and comment period surrounding the Asian Long Horn Beetle.

Being told by the USDA's Animal and Plant Health Inspection Service that the reason that Prall's Island and Staten Island were not being properly monitored for this insect and the reason the people of Staten Island were not given proper notification and comment period was due to a lack of funding is simply unacceptable.

In the article written by Andy Newman in the Sunday, June 10, 2007, New York Times he says "Considering the scope of the arborcide, there has been relatively little public outcry. If you are going to cut down 11,000 trees in New York City, northwestern Staten Island is apparently the place to do it."

We cannot fault this reporter or anyone else for viewing us as a population disinterested, lazy and ignorant of our environment based on first appearances. The truth is we are very upset over how this whole thing was handled and feel that we were not allowed to participate, as is our right under democracy.

After 9 plus years of this beetle being in our country no one thought of a better eradication plan other than cutting and burning 11,000 native trees? Followed by never developing a fully funded reforesting and restoration plan? It is apparent that our Federal Government cannot be looked to, to protect our Staten Island neighborhoods, forest and parks, isn't it time we got a clue and did it for ourselves.

This act of injustice makes it necessary to fund programs to train and educate Staten Islanders on forestry, monitoring, maintenance and upkeep of one of Staten Island's greatest assets our native trees and plant life. It is only by chance that Prall's Island does have reforesting funding; Staten Island has no such funding. We are asking that you make the necessary efforts to assist in providing the funding for proper public notification, and

comment period, reforesting and restoration due to loss, so that if this should ever occur again we will be financially prepared to help ourselves. We have sent similar letters to our state representatives and city elected officials.

Once again on behalf of the members of the NSWC we would like to thank you for your time, support and consideration, and we look forward to hearing from you.

Sincerely,

Beryl A. Thurman, President

www.nswcsi.org

CC: Andy Newman, NY Times, NSWC, Borough President James Molinaro, Commissioner Adrian Benepe, Commissioner Thomas Paulo, NRPA, MMC, SMC. Christine Markham, NPD, USDA, APHIS, PPQ, SITA, Councilman James Oddo, Councilman Michael McMahon, Councilman Vincent Ignizio, PPOW.

USDA-APHIS
4700 River Road
Unit 137
Riverdale, MD
20737

Re: Comment, EA: ALB Cooperative Eradication Program in the NY Metropolitan Area, May 2007

20 June 2007

To Whom It May Concern:

I submit the following comment in regards to the May 2007 Environmental Assessment and Finding of No Significant Impact drafted for the Asian Longhorned Beetle (ALB) Cooperative Eradication Program in the New York Metropolitan Area, as accessed from the USDA website on 17 June 2007 (http://www.aphis.usda.gov/plant_health/ea/downloads/alb-fonsi.pdf).

In regards to the statement that "the cutting (removal) of susceptible host plants within a defined radius of an ALB find may have adverse effects on local wildlife that depend on vegetation for food, cover, and related needs" (pg. 5, III. Environmental impacts, B. Preferred Alternative), I request that you consider the adverse effects that removal of infested and/or susceptible host trees would have on long-legged wading bird populations in metropolitan New York.

Currently, seven species of colonial wading birds (i.e., herons, egrets, and ibis) nest on islands in the NY/NJ Harbor and surrounding estuaries (Bernick 2007). These species include Black-crowned Night-Heron, Great Egret, Snowy Egret, Glossy Ibis, Little Blue Heron, Tricolored Heron, and Cattle Egret. Two additional species, Green Heron and Yellow-crowned Night-Heron, nest both within island colonies and in mainland areas. To date, there are approximately 1,800-2,000 pairs of wading birds currently nesting in the metropolitan New York area.

In the mid to late 1970's, wading bird populations in NY/NJ Harbor began to increase dramatically. These birds, so closely tied to estuarine foraging resources, are considered to be important bioindicators for ecosystem health. Several influential publications on the health of NY/NJ Harbor by the Hudson River Foundation, the Hudson Estuary Program, Trust for Public Land, and others use he resurgence of wading birds into NY/NJ Harbor as evidence for improving water quality conditions and subsequent increases in estuarine fish and invertebrate populations (Steinberg et al. 2004). In 1990, the US Environmental Protection Agency designated a considerable amount of the western shore of Staten Island, including areas impacted by the recent ALB infestations and management on Prall's Island and Old Place, as 'The Harbor Herons Wildlife Refuge.'

These wading birds are listed as species of special concern by the New York State Department of Environmental Conservation. Additionally, the New Jersey Department of Environmental Protection.designates two of these species (Black-crowned Night-Heron and Yellow-crowned

Night-Heron) as state threatened, and another two (Tricolored Heron and Little Blue Heron) as species of special concern. Several of these species have worldwide ranges, and are listed in the North American Waterbird Conservation Plan (Kushlan et al. 2002) as species of moderate concern, suggestive of a moderate decline in worldwide populations.

In 2007, eight islands were confirmed as colonies for wading birds in the NY/NJ Harbor area, including (north to south) Huckleberry Island, Goose Island, North Brother Island, South Brother Island, Mill Rock, Canarsie Pol, Subway Island, Hoffman Island, and Swinburne Island. Mainland nesting for Yellow-crowned Night-Herons were noted in northwestern Staten Island (in the vicinity of Old Place Marsh), the Rockaways, and at several locations in Secaucus, NJ (Bernick 2007).

Wading birds require trees for nest-building and nest material. In the NY/NJ Harbor colonies, some of the preferred nesting tree species directly overlaps with the preferred host trees for ALBs. – for instance, approximately 80% of the wading birds on South Brother Island nest in Box Elder *Acer negundo*. Historically, Gray Birch *Betula populifolia* has been an important nesting tree for Staten Island area colonies, including Prall's Island, Isle of Meadows, and Hoffman Island.

If infested trees are located on island or in mainland habitats where wading birds nest, or wading bird colonies fall within the removal area as designated in the current ALB management plan, there is no doubt that the removal of infested and/or susceptible host trees used as nesting trees by wading birds will have a disastrous impact on breeding populations in the metropolitan NY/NJ area.

The timing of tree removal may also have a disastrous impact on wading bird population stability. For instance, if an ALB infestation is located in a wading bird colony where the majority of tree species are not ALB hosts (i.e., Black Cherry *Prunus serotina*), removal of infested trees should occur outside of the breeding season to avoid impact on nesting. In the NY/NJ Harbor area, nesting begins in early March and concludes in early to mid September. If a small number of host trees require removal due to ALB infestation at an active wading bird colony, if the removal occurs during the breeding season then it is almost certain that nesting will be detrimentally impacted.

I bring the issue of wading bird activity in NY/NJ Harbor to your attention as a call for early action in areas where known wading bird colonies exist, and do not yet fall into removal, treatment, or survey areas. At present, we do not know if ALBs are on island colonies that fall just outside of current survey efforts (Shooters Island, South Brother Island), to those that may become impacted by ALBs in the future (Huckleberry Island, Goose Island, North Brother Island, Mill Rock, Canarsie Pol, Subway Island, Hoffman Island, and Swinburne Island).

I suggest that the ALB Cooperative Eradication Program take a proactive approach with these sensitive areas, by (1) surveying all areas known to support breeding wading birds for the presence of ALB, and (2) creating a preventative treatment plan, such as imidacloprid injection, for these locations to reduce theopportunity future infestations will occur. I also recommend that the ALB Cooperative Eradication Program work closely with the Hudson Estuary Program's

Harbor Herons Subcommittee (lead by Dr. Susan Elbin and Yigal Gelb) to discuss management options and nesting schedules.

Thank you for your consideration of the above comments. I realize that my comments are quite specific, but I feel strongly that wading bird populations and the critical nesting habitat they require could be protected with adequate foresight and early action to prevent ALB infestations. If you have any further questions regarding my statements, I would be pleased to discuss them with you – I can be reached via the contact information below.

Sincerely,

Andrew J. Bernick, Ph.D.

Alexandria, VA 22303
Tel:

Cc: Dr. Robert Baca via e-mail, 22 June 2007

Literature Cited

Bernick, A. 2007. NYC Audubon Harbor Herons Project: Nesting Survey Report 2007. Unpublished report to NYC Audubon. *In prep.*

Kushlan, J. A., M. J. Steinkamp, K. C. Parsons, J.Capp, M. Acosta Cruz, M. Coulter, I. Davidson, L. Dickson, N. Edelson, R. Elliot, R. M. Erwin, S. Hatch, S. Kress, R. Milko, S. Miller, K. Mills, R. Paul, R. Phillips, J. E. Saliva, B. Sydeman, J. Trapp, J. Wheeler, & K. Wohl. 2002. Waterbird conservation for the Americas: the North American waterbird conservation plan, version 1. Waterbird Conservation for the Americas, Washington, D.C. 78 pp.

Steinberg, N., D.J. Suszkowski, L. Clark, and J. Way. 2004. Health of the harbor: The first comprehensive look at the state of the NY/NJ harbor estuary. A report to the NY/NJ Harbor Estuary Program. Hudson River Foundation, New York, NY. 82 pp.

June 21, 2007

Ms. Sharon Wheat
US Department of Agriculture
Animal and Plant Health Inspection Service
4700 River Road, Unit 137
Riverdale, MO 20737

Dear Ms. Wheat,

Thank you for the opportunity to comment on the Environmental Assessment for the May 2007 effort to eradicate Asian Longhorned Beetle here on the west shore of Staten Island.

I am dismayed that after nine years the response is the cutting of almost 8,000 trees in a natural area. To me, the occurrence of Asian Longhorned Beetle is no longer an emergency, but something that needs to be aggressively monitored and eradicated without destroying habitat. I hope Animal and Plant Health Inspection Services (APHIS) is working to develop less destructive practices, to be more aggressive in surveying potential areas and also to be on the look out for the next aggressive invader and destroyer of the natural environment. I appreciate that this is a big task and that it is limited by the amount of money allocated for this purpose. I have written to my legislative representatives to ask for funds for APHIS so that surveys of critical areas can be done on a timely basis.

Sincerely,

Catherine Barron

Staten Island, New York 10310

E-mail:

Mailing address above.
Home address is Staten Island, NY 10310.