

FINDING OF NO SIGNIFICANT IMPACT

Adoption of the U.S. Department of Agriculture, Animal and Plant Health Inspection Service Decision and Finding of No Significant Impact for Field Release of the Insects *Calophtya 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*, (Thysanoptera: Phlaeothripidae), for Biological Control of Brazilian Pepper Tree, *Schinus terebinthifolius*, on the Lower Suwannee National Wildlife Refuge, Florida

April 2020

Proposed Action and Alternatives: The U.S. Fish and Wildlife Service (USFWS), National Wildlife Refuge System (NWRS) is proposing to 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 would 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 has adopted 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) allow the release of *Pseudophilothrips ichini* for biological control of *Pseudophilothrips ichini*. A third alternative, to allow 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) for *Pseudophilothrips ichini*.

Public Review: Notice of this 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 – 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 (NWR or 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 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 effort is 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 *Pseudophilothrips ichini* 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 *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), South West 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 (the SUP applicant on this project) 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.
- 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.
- The release of *Pseudophilothrips ichini* or the biological control of BP is consistent with [601 FW 3 \(Biological Integrity, Diversity, and Environmental Health \[BIDEH\]\)](#) through the pursuit of BIDEH by eliminating unnatural biotic and abiotic features and processes not necessary to accomplish refuge purpose(s). 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 Finding of No Significant Impact was made available to the public for a 30-day review period which began on 23 June 2020 and ended on 24 July 2020. Copies of all the relevant documents were available in the [Lower Suwannee and Cedar Keys National Wildlife Refuges office](#), with the public having had the opportunity to call the Refuge Manager's cellphone for an appointment (703.622.3896) 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 also available as web links on the [Friends of the Lower Suwannee and Cedar Keys National Wildlife Refuges website](#), and distributed to local news outlets: Cedar Key News, Gainesville Sun, Dixie County Advocate, and the Chiefland Citizen.

The two comments received were supportive of the action. One comment urged caution on the unintentional introduction of non-native species such as *Pseudophilothrips ichini*.

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.



Name: Andrew Gude
Title: Refuge Manager

Date: 3 November 2020

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>.
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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>.

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<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/>.

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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.