



DECISION RECORD

Field and Captive Studies to Assess the Safety and Efficacy of Treatment Delivery Methods in Bats

This Decision Record documents the decision and rationale for the selection of the preferred alternative presented in the Environmental Assessment for field and captive studies to assess the safety and efficacy of treatment delivery methods in bats. The Environmental Assessment documents the environmental analysis the U.S. Geological Survey conducted to evaluate site-specific effects on the human environment that may result from the implementation of this project. The Environmental Assessment and the Finding of No Significant Impact was issued on November 19, 2019. Notice of availability for the Environmental Assessment and Finding of No Significant Impact will be published on the National Wildlife Health Center website <https://www.usgs.gov/centers/nwhc>.

1. Compliance with Major Laws Pertinent to the Decision

The decision to authorize the proposed actions follows the National Environmental Policy Act of 1969, as amended (42 USC 4321-4347), the regulations of the Council on Environmental Quality implementing the procedural provisions of the National Environmental Policy Act (40 CFR 1500-1508 and updated guidance), and the Department of the Interior regulations (43 CFR Part 46). It also complies with major laws pertinent to the decision, including the Endangered Species Act of 1973 (16 USC 1531 et seq.), National Historic Preservation Act, as amended (16 USC 470), the Clean Water Act of 1977, as amended (PL 95- 217, 33 USC 1251 et seq.), and the Federal Facility Compliance Act of 1992 (PL 102-386).

The proposed project will not make any physical changes to the sites and will not require any new environmental permits for operations after implementation. The lists of laws and regulations that may influence this project are included in Appendix B of the Environmental Assessment.

2. The Decision

It is the decision to authorize the preferred alternative, Proposed Action-Alternative 1, for the proposed project. This alternative is described in *Section 4.1: Proposed action (Alternative 1)*, of the Environmental Assessment (page 13).

The selected alternative, Proposed Action-Alternative 1, is to conduct captive trials to evaluate the safety and efficacy of various delivery mediums and devices in a controlled setting at the

National Wildlife Health Center, MI. Following the completion of captive studies, field trials will begin to test the delivery treatment in free-flying wild bats and will take place at selected sites in Minnesota and Wisconsin. The area of impact for the field studies would be limited in size (e.g., <3 acres) and have restricted access. The Proposed Action will provide vital information regarding the mass delivery system for treatment of wild bats that could be used to mitigate the effects of diseases, including white-nose syndrome, in North America.

Mitigation

USGS commits to minimization and mitigation of potential impacts to the human environment using public information announcements, restricted access to field sites, and humane treatment of animals according to Wisconsin Department of Natural Resources, Minnesota Department of Natural Resources, and Animal Care and Use Committee protocols.

Monitoring

Careful monitoring of captive bats and wild bats at the field sites will be performed. Abundance measurements will be undertaken before and after delivery treatment to assess decreases in abundance or survival due to delivery mediums and devices. Live-trapping of animals will permit sample collection, health inspections, and delivery treatment comparisons between the pre/post-treatment and control plots.

3. Finding of No Significant Impact

The Environmental Assessment for the proposed field and captive studies to assess the safety and efficacy of treatment delivery methods in bats resulted in a Finding of No Significant Impact (FONSI). The proposed action was analyzed in an Environmental Assessment and was found to not be a major federal action significantly affecting the quality of the human environment within the meaning of NEPA of 1969. Preparation of an Environmental Impact Statement will not be required.

4. Public Involvement

Public input included requests for input and information early in the project from agencies with potential interest or jurisdiction, and from local organizations with a potential interest in the proposed project. Responses received from Federal and State agencies during the Environmental Assessment analysis did not include any concerns or issues that directly affected the proposed project. Copies of the responses received from the agencies are provided in Appendix A of the Environmental Assessment. No substantial issues with adverse environmental impacts were raised after the USDA-APHIS prepared an Environmental Assessment and issued a Finding of No Significant Impact on September 6, 2019. Further, no substantial issues with adverse environmental impacts were raised after the USGS prepared an Environmental Assessment and issued a Finding of No Significant Impact on October 21, 2019.

5. Rationale for the Decision

The preferred alternative, Proposed Action-Alternative 1 addresses the purpose and need of the project (Environmental Assessment, page 9). The purpose of the proposed action is to assess the safety and efficacy of treatment delivery methods in wild bats after treatment delivery tests in the field. The preferred alternative will enable collection of data to assess the safety of the appropriate application volume for topical administration of delivery mediums in the field in a timely manner. One other alternative that was assessed but not chosen, another time (Alternative 2), would delay collection of data and impact future studies on safe delivery methods and its subsequent use as a management tool to confer protective immunity against other diseases, including white-nose syndrome, and for the ongoing conservation efforts for wild bats.

RESPONSIBLE OFFICIAL

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