

Comment Response Matrix
House Mouse Eradication from the South Farallon Islands:
Administrative Draft Environmental Assessment, January 2011

#	Location of comment			Comment	Priority (1-3)	Reviewer	IC response
	Page	Line	(Section)				
	25	10	5.2.1	<i>Remove last sentence of paragraph</i>	2	JD	<i>Text revised per comment</i>
1.	Throughout			Many edits and comments throughout the PDF version of document. I've highlighted many but not all of these in the comments matrix.	2-3	GJM	
2.	i-ii		Abstract and Exec Summary	Will need to revise to reflect current two action alternatives.	2		
3.			Purpose and Need	Minor edits throughout.	3		
4.	3	5-6	Purpose and Need	Edited wording on BUOW survival since more recent data shows many owls do appear to survive the winter.	2		
5.	3		Purpose and Need	Delete graphic. Mice on Farallones shown to feed only rarely on bird eggs, no evidence of chicks, so is not accurate.	1		
6.	3	7	Purpose and Need	Peregrines also kill some BUOW. Not sure to what extent, though.	2		
7.	throughout			Make sure use of the words "Farallon" and "Farallones" are used correctly. "Farallones" is used only when referring to more than one of the islands when the word "islands" is not included; e.g., "Farallones" or "South Farallones". When using the word "Island(s)", then it is just "Farallon"; e.g., "Farallon Islands," "South Farallon Islands." A find and replace to correct these is needed.	2		
8.	Throughout			Some text has been inserted from the Palmyra EIS, when the word "Palmyra" or something associated only with Palmyra was left in. I've pointed out many of these in the PDF but please make sure to scan the document carefully to correct.	2		
9.	4	42-44	1.3.2	Word edits. Prefer gull "management" to other terms.	2		

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10.	10	30	1.4	Farallon CCP was finalized in Sep 2009.	2		
11.	12	47	1.6.4.2	Marine Reserve was established in May 2010.	2		
12.	13	2	1.6.4.2	Edited sentence to clarify regs of Marine Reserve.	2		
13.	14		2.1	Suggest switching alternatives to have bait station last to keep more similar alternatives consecutive (smoother transition).	2		
14.	14		2.1	To titles of alternatives B and D, add " as <i>primary method of bait delivery</i> "	2		
15.	15	13	2.2	No owl relocations in 2009, 2010 either.	2		
16.	16	31-32	2.3.2	Don't think we need in here, but need to be ready to answer questions on what the other 29% of successful eradications used, and what was used in unsuccessful eradications.	2		
17.	17	26		If only fed agencies can purchase brodifacoum, will FWS need to purchase and not IC? This is a budget issue.	1		
18.	18	5-6	2.3.2	Don't understand how the last sentence applies here.	2		
19.	21	12	2.3.5	Delete. During this, will have to broadcast everywhere needed.	2		
20.	21	14	2.3.5	Delete. Same as above. Will need to haze pinnipeds first to clear area.	2		
21.	27	29-31	2.3.8.2	Need to revise to reflect large numbers of gulls present in Nov-Dec and include data on numbers of birds present in Jan-Mar. Latter period much the same as Nov-Dec but gull numbers much higher.	2		
22.	29	40	2.3.12	In response to Dan's comment on helo touchdowns on West End, we will have to look into that. Would require special permission.			

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23.	30	19	2.3.13	Response to Dan's comment on relocating granivorous birds, this has been mentioned in the past but feelings by some that numbers are so low as to not warrant it. But, we should at least make an effort for what is there.			
24.	32	3	2.3.14.3	Main data sets for monitoring would include annual breeding population surveys (esp. of ASSP), surveys of # of over-wintering owls, and owl predation surveys. Uncertain whether acoustic monitoring will continue (only started as test project two years ago), but possibly that or other methods. I inserted some edits in document.	2		
25.	32	8	2.3.14.3	Veg mapping would be good regardless, but given the current spread of some of our invasives mixed with control efforts, drawing conclusions from the eradication to effects on plants will be difficult without a much more intensive effort.			
26.	32	32	2.3.14.4	Delete "Dr." for Jan R.	3		
27.	33	1	2.3.14.4	I don't recall cricket surveys being part of previous plan. Agree it's a good idea but we haven't discussed who will conduct. Would prefer to find some expertise in sampling.	1		
28.	33	13-14	2.3.15	Add the Southeast Farallon Island State Marine Conservation Area, which abuts a portion of the Marine Reserve and is part of newly established MPAs. SMCA only allows certain types of fishing (salmon trolling).	2		
29.	33	14	2.3.15	Link to access maps, coordinates of SEFI and other MPAs is: http://www.dfg.ca.gov/mlpa/nccmpas_list.asp We also have shape files of MPAs and PRBO has a nice map of the reserve that they made.	2		
30.	36		2.4.2	Figure needs caption.	2		
31.	37	41		Should be Study area A that received 36 kg/ha, not B. Right?	3		
32.	38			Figure needs caption.	2		

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33.	43	20	2.4.4.2	Missing or too much text. I made a note of location.	3		
34.	44	1-2	2.4.4.4	Indicates that 324 hours of observations EACH DAY. Revise text to clarify.	3		
35.	47	25	2.4.4.6	How many, or what % of mice were in reproductive condition?	2		
36.	47	27	2.4.4.6	Delete. No data were obtained from this study on what the mice are eating (native vs. non-native plants) and estimate will be very, very rough. Don't think it's needed.	2		
37.	47	38		For salamanders, did results really tell us much about potential exposure?; i.e., issues with finding salamanders in baited areas.	1		
38.	47	39		What data did you obtain to show this?	1		
39.	48			Map of DNA collection sites only indicates collections on West End.	2		
40.	49			Cave map does not include Jewel Cave.	2		
41.	50		2.4.1	Should something be said about the greater time efficiency of aerial broadcast vs. hand-spreading more areas? Does this substantially increase chance of success?	1		
42.	50	16		I wouldn't say that because of wilderness designation that, say, hand spreading couldn't be done. What the helo will do is limit the amount of time the wilderness will be impacted, plus get bait to inaccessible areas. And getting all that bait transported to the wilderness areas without helo support will be a significant challenge.	1		
43.	51		2.4.2.2	Need to determine use of bait stations in gull roost areas. Also, should we begin baiting around houses earlier to help mouse-proofing. From latest assessment by our maintenance staff, sounds like mouse proofing exterior of houses will be extremely difficult if not almost impossible.	1		
44.	53	12		Not sure shorebirds at lowest then. Quite a few winter. Check.	1		

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45.	53	17-19		Rephrase BUOW section to indicate that owls would likely be held until toxicant levels would not be a risk, just in case owls might return. Then, relocate on mainland. This is not what Service has done in the past.	1		
46.	53	24		Need to flush out gull hazing more. What are specific goals, what areas of island(s), for how long?	1		
47.			2.5	Move section to Considered but rejected and revise to reflect that.			
48.			2.5	Even though this will no longer be an alternative, this section needs to be flushed out a bit further. For example, exactly why the wilderness designation would impede bait stations there, how breeding areas and haul-outs would need to be visited and disturbed as well as the impacts of that. For seabirds, this would result in large-scale nest abandonment if conducted during the breeding season (thousands of violations of MBTA and potential difficulty of permitting); for pinnipeds, hundreds of violations of ESA (Steller sea lions) and thousands to MMPA (without permits) and not consistent with the goals of the Farallon NWR. See comments below about pinniped disturbance. Most importantly, need to show why it won't work, regardless of these. Also, need to show better why bait stations would need to be done for at least a year. Now, it states that bait stations would be started after fledging ends, then aerial and hand broadcast a few months later. Sounds like that might be it, which in this case, doesn't sound so bad.	1		
49.	57	6		May also need alterations to keep gulls from disturbing.	1		

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50.	57	35-36		Depending on whether wilderness designation would prohibit bait stations in those areas, probably close to half of West End would be available for baiting, at least from a safety perspective, regardless of pinniped and seabird areas. Pinniped (especially) and breeding seabird disturbance, however, would be huge.	1		
51.	59		2.5.7	Mitigation measures: Not described when or why mitigation measures would be needed. I assume some measures (e.g, carcass removal) would be needed throughout. Would hazing, capture of raptors, odthre birds be done only for aerial application phase?	1		
52.	59	36	2.5.7	Timing: Does this only apply to aerial and hand broadcast portion.	2		
53.	60	5	2.5.7	Given that bait stations would be primary method, don't need this. Confusing as to why it's there.	2		
54.	60		2.5.7	Additional mitigation: Could the bait station method be successful by avoiding using bait stations in pinniped areas or in areas where pinnipeds would be disturbed? If not, need to develop section to include bait stations in those areas, then discuss likely impacts and (maybe) additional permitting that would be necessary (and unlikely?) under this scenario. As was pointed out in our FWS meeting, need to show what it would take to have highest likelihood of success, then show impacts and discuss how success would be unlikely under this scenario.	1		
55.	61	21	2.6.1	Don't say "only" drawback. Could be others we haven't thought of yet.	2		
56.	61	11		Will hazing be more intensive or just more prolonged?			

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57.			2.6.2	Figures: As far as differences between the two overlap options, I don't recall Weather Service Peninsula as being much of a gull roost, but I could be wrong. It is a large pinniped haul-out, but to get to the outer part of the peninsula across from West End, you will have to disturb those animals anyway, and helo drop will likely disturb them, too. So I don't see much difference. I would say with what seems necessary for success.			
58.			2.6.2.1	In Alternative B, sounds			
59.	65		2.6.3	This applies to Alt. B, too. In addition to elephant seal pupping, need to add that we need to conduct before gull numbers swell in early winter. This may be more important than the elephant seal issue. Thinking about this more, we have a small e. seal breeding population. If this was conducted during seal pupping, we could potentially minimize impacts to them by doing hand-broadcast and/or bait stations in the few breeding areas we have. They are not very prone to flushing anyway; they're actually hard to move. Thus, we could possibly do this during e. seal breeding season. However, with rising gull numbers, non-target impacts to them will likely increase substantially in early winter, at least on SEFI. But if numbers aren't very high on West End, might be a way to extend broadcast window into Jan. or Feb. there. Let's discuss with PRBO after we look at gull data more.	1		
60.	66	41	2.6.5	There are other types of temporary fencing that will probably be easier to install than plywood.	1		
61.	67	10-11	2.6.5	I think we only need to be concerned with gull areas, not murre, for aerial application.	2		
62.	67	45-46		Haven't seen where hazing will be so much more extensive in this alternative.			

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63.	69	23		It's not clear to me how the hazing techniques in this alternative are more intensive or even different from hazing in Alt. B, except that gulls would be given areas on the adjacent island to roost.			
64.	70		2.8	Table 2.1: - % of land: May need to reduce if bait stations used more in gull roost areas. - Risk to non-targets: How is it lowest in Alt. D? Still don't see how it really reduces risk of uptake, esp. since it prolongs period that bait will be available overall.	1		
65.	71	23-25	2.9.1	Need to add something about our narrow time frame for implementation.	2		
66.	72	17-end of section	2.9.2	Move discussion of diphacinone to section 2.9.1.	1		
67.	73-74		2.9.2	Much of the discussion of diphacinone vs. brodifacoum obviously taken from Palmyra EIS and focused on rats. Edit to tailor to Farallones and mice.	2		
68.	73	10-13	2.9.2	While figures of number of successful eradications with different techniques in informative, are they biased by numbers of attempts with different techniques? How do % success compare?	1		
69.	74		2.9.4	Also, can't get traps to many parts of islands.	2		
70.	75		2.9.7	Same as above. Add that can't get traps to many parts of island.	2		
71.	79	14		Revise sentence. GFNMS is affected by lots of pollutants and discharges, especially the San Francisco Bay plume, illegal sewage discharges, relatively frequent oil spills, potential radioactive waste, etc. It's more like current regulations on discharge and extraction of mineral resources help protect water quality, and it is probably better than certain other areas of the California. Relative to other	2		

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72.	79	27-28		Yes, ASBS is correct but should clarify that it is a state designation. I checked with ASBS coordinator on need for permit and she said we didn't need one, but we'll need to check again.	3		
73.	80	10	3.3.3	Wilderness Area also includes other islets surrounding SEFI. In other words, all island and islets except for SEFI.	2		
74.	82			See text edits.			
75.	82	41		100 overwintering landbirds sounds very high. Check.	2		
76.	83	37		Needs a new section header: "Non-breeding birds."	2		
77.	84	18-29		Need to add info on wintering Peregrines and Burrowing Owls. Before we had a resident pair, several Peregrines wintered on the island, often going back and forth to mainland. Resident pair now chases them away but some still visit at least on occasion. Need a paragraph dedicated to burrowing owls, including when they arrive in fall, depart in spring, and estimates of how many overwinter. This section can be supplemented from recent fall migration reports and PRBO unpubl. data. Jim Tietz is best one to get this info from.	2		
78.	86	3		Yes, recent report by Lee with estimates modeling of salamander cover board pop size, annual survivorship, reproduction, and other parameters. Report getting a few revisions done to it now but Dan has a draft (it might say "Final" but it's not the final).	2		
79.	93	16-17		Provided brief description of weed management efforts in document.	2		
80.	93	43		California Department of Fish and Game also has regulatory authority out to state boundary which is 3 miles from mean high tide line.	2		

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81.	93-94		3.5.1	Section on State Marine Protected Areas needs revising based on regs implemented in May 2010. Get info on new Southeast Farallon Island state marine reserve, Southeast Farallon Island State Marine Conservation Area, and Southeast Farallon Island Special Closures from www.dfg.ca.gov/mlpa/pdfs/nccsr12_22_09.pdf . Regulations and maps for SEFI MPAs are on pages 16-19. Please note that there are proposed changes and clarifications to the Special Closures, as two areas were supposed to be seasonal but were incorrectly designated as all year. The remaining areas will be all year.	2		
82.	102	32	4.3.2	Although this alternative is now going to the dismissed section, need to make clear that frequent access of rocky and otherwise unstable slopes will result in frequent dislodging of rocks, trampling of plants, crushing auklet burrows, etc., that will not only cause erosion but will impact habitat, including for storm-petrels and auklets which often breed in crevices under rocks.	2		
83.	102		4.3.2	Any other studies besides Anacapa that have measured for soil contamination of brodifacoum?	2		
84.	103	18		Minimum Requirements Analysis was started, but not completed awaiting Admin Draft of NEPA document.	2		
85.	103	30-36	4.3.3	Need description of what the impacts to wilderness character will be, such as: presence and noise of low flying helicopter; disturbance to marine mammals (?). Might we need to land helo over there to transport personnel? Ditto for Alt. D.	1		
86.	103	40-47		Installation of bait stations, although temporary, could potentially be viewed as a degradation of the wilderness character. Need further clarification on that. Patricia Roberson is best contact.	1		

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87.	105	27-32	4.4.2	What about whether high likelihood of impacts to Farallon populations? Given the island's somewhat isolated nature and important populations to some species, this would make sense to include in analyses.	1		
88.	105	44	4.4.4.2.1	In reference to comment g103, the only other possible listed species is Peregrine Falcon for California. They were proposed to be delisted, but not sure if they still are. Also, I'm not exactly sure how state listed species are treated in an EIS. My preference would be treat them the same as federally listed.	1		
89.	107	16	4.4.4.2.3	Think we need to list species that occur on Farallones that do not fall under MBTA, such as starling, rock pigeon, house sparrow.	2		
90.	107		4.4.3.2.1	Need to include some of the more recent info on burrowing owls. Would like Jim Tietz to review this and provide input. May be more birds overwintering than previously thought, or may be that just more birds are overwintering. But, data still needs to be analyzed on just how many are making it through the winter.	1		
91.	108		4.4.3.2.2	Any evidence that mice prey on salamander eggs or young, What about potential competition for space since they are both burrowers, both probably use seabird burrows, and rock crevices?	1		
92.	109		4.4.3.3.2	Delete. BRPE; is no longer on ESA list, which I'm sure is why this was here.	2		
93.	111	13		Define a "dose". This sentence is hazy because toxicity also depends on body size and how much rodenticide is in each dose.	2		
94.	112	7-8		Second half of sentence is inconsistent with the first. How would would insectivores consume the bait? Accidentally?	2		

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95.	112	10	4.4.4.1.3	I imagine scavenging invertebrates could also be exposed secondarily by consuming dead mice or birds. This could have importance for more secondary (or tertiary) exposure to insectivores. Probably not real big, but present.	2		
96.	112	20-26	4.4.4.1.3	This list of species at risk of secondary exposure in highly incomplete. Missing owls, peregrines and other raptors, gulls, ravens!!!	1*		
97.	112	20-26	4.4.4.1.3	Something else we'll need to think about will be exposure to non-resident Peregrines. The resident pair mostly chases these off now. But with them held in captivity, the island will be more open to visiting Peregrines, which come and go through the winter. We may need a strategy of continuing to capture Peregrines through the period of potential exposure.	1*		
98.	112			Describe potential impacts to marine mammals: potential for stampeding by sea lions can result in injury; juvenile sea lions and fur seals could be at risk of being crushed in stampede. Fortunately, because juveniles are highly mobile by this time and often separated from mothers, don't have to worry about those issues.			
99.	112	40-42		Reference to boobie disturbance doesn't apply here. But add that birds present will likely flush from the area during low helicopter passes. Since birds will not be breeding, impacts will be relatively low.	2		
00.	113		4.4.4.3	Describe criteria for selection of species analyzed in this section and refer to appendix with species lists (if it doesn't already).	2		
01.	114		4.4.4.4.1	Need references to back up statements of timelines.	2		

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02.			4.4.4.4.1	Within each group, please re-order species as best as possible according to American Ornithological Union order, which is standardized and will help many readers follow better. Easily available online. Also, order species groups by: 1) seabirds; 2) raptors; 3) shorebirds; and 4) songbirds or whatever categories these will be put into (see below).	2		
03.	115-118		4.4.4.4.1	Why are Ferruginous and Rough-legged Hawks and White-tailed Kite analyzed here? I believe they are very rare on the island.	1		
04.	115-118		4.4.4.4.1	Seems like more of the raptors can be lumped into one group, instead of the several that are there now. Some groups seems to have identical descriptions of food and risk.	2		
05.	120	2		Says these spp. eat intertidal inverts. I don't think so.	2		
06.	120+		4.4.4.4.1	Change headings of bird groups by primary food: Frugivores, insectivores, and granivores. This puts them essentially into risk categories (granivores highest risk), even if numbers at risk not treated differently. Current categories incorrect anyway. Or, if listed more by numbers at risk, call all the everything "Passerines" that are currently under songbirds, insectivores, resident sparrows, non-resident sparrows.	2		
07.	125			Resume with shorebirds.			
08.	126		4.4.4.4.1	For shorebirds that feed almost entirely on intertidal invertebrates (black turnstone, wandering tattler, black oystercatcher), seems like their risk to exposure would only be low to medium but currently listed as high. Also applies to some other species.	1		

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09.			4.4.4.4.1	For shorebirds and seabirds, I added some information on where they occur on the islands (immediate coast, upland, or both) to help distinguish exposure risk. Diet of some species needs checking.	2		
10.			4.4.4.4.1	Exposure risk of some needs possible re-evaluation; some listed as high seem to me to be low to medium because of their habitat use (strictly shoreline) and diet (mostly marine invertebrates) on the island.	1		
11.	132	4		Put geese under header "Waterfowl".	2		
12.	132	4		We need to add "Brant" to species list, under Waterfowl. Occasional migrants occur plus there has been an individual living on the island off and on for something like 15 years. Brant occur both along the shoreline and in upland habitats. Exposure risk will be high.	1		
13.	132-133		4.4.4.4.1	For all pinnipeds, the description of no exposure risk seems a bit strong. We have already recognized that some bait will inadvertently end up in the water, potentially exposing some fish. Also, there is some chance that animals will inadvertently consume bait, maybe more likely younger animals. I'm not sure, but sea lions may consume pebbles and small rocks to help grind up fish bones in the digestive tract, like many birds do, and could consume bait that way. So maybe calling exposure risk low, and adding that risk of mortality is very low because of amount of bait they would need to consume.	1		
14.	133	15		Not sure we need bats included. Don't think we get them past October, but check. If bats do stay in, I exposure risk would be low since they feed on flying insects would have low exposure risk (yes?).	1		

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15.	133	26		If bats do stay in, would be at high risk of disturbance since there would be much foot activity around roost sites and helos may disturb as well.	2		
16.	133	138		Is risk of mortality to salamanders known to be high or are we just assuming so? From what I understand, it's uncertain but some believe it to be low. Yes? We should clarify uncertainties.	1		
17.	134	16		For marine fish, what about risk of ingesting pellets? Also, add that risk would be limited to those individuals in intertidal pools and adjacent to immediate shoreline, and that risk would be further reduced by methodology used to prevent/reduce bait drop in marine environment.	1		
18.	134	35-37		Need citation. Also, describe case in NZ of ship spill of brodifacoum and measured uptake (exposure) by intertidal inverts (I believe mussels) which did not result in toxic effects. However, uptake could provide for secondary exposure to other species that consume intertidal inverts.	1		
19.	135	2-4		Cave Crickets: need citation at least indicating that, like other inverts, risk will be low. As is, open to much scrutiny.	1		
20.	135			Need section for other terrestrial invertebrates!	1		
21.	135		4.4.4.4.8	Table X. Risk levels of many are inconsistent with species accounts!	1		
22.	137		4.5.1.2	Add that potential impacts to salamanders, invertebrates also would not be detectable to boaters.	2		
23.	137	28	4.5.1.3	Need a distance that waters surrounding island will be closed to boaters during application. Ditto for other action alternative.	1		

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24.	137		4.5.1	See additional comments and added text in PDF. Important points on extra disturbance during hazing, pinniped disturbance. We'll need to determine level of pinniped disturbance during hazing for MMPA permit. Make sure comments extend to phased implementation section.	1		
25.	138		4.5.2.	State Marine Reserve now surrounds island and 300 foot special closure partially surrounds island. Need to determine how far offshore we will need to close island and if that intersects current fishing closure.	1		
26.	139		4.5.3.1	Have not consulted with cultural resources yet. Waiting for final plan on how houses and Carp shop will be dealt with.	1		
27.	139		4.5.3.3	What about soil disruption from bait station placement that will occur?	1		
28.	140		4.6.2	Add that cumulative impacts to other species is also likely. For example, salamanders and other amphibians are declining worldwide, probably due in part from climate change (need reference; see recent Lee 2010 report). Competition, and potential predation on salamanders by mice, could exacerbate climate change or other impacts to salamanders. Same could be true for inverts that mice feed on, but less known. Mice also could be contributing to spread of invasive plants by eating hard-coated seeds that may not be digested and ejected elsewhere in feces, and reducing production of native plants by eating buds or seeds that will not be allowed to germinate. But it's also possible that these impacts are mitigated by invasive plant seeds that are consumed and digested completely. I don't know much about this.	1		

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#	Location of comment			Comment	Priority (1-3)	Reviewer	IC response
	Page	Line	(Section)				
29.	140		4.6.2	Another potential impact from mice, maybe more to humans, is from diseases such as hantavirus. Although hantavirus is more common inland in California, deer mice on the Channel Islands have some of the highest occurrences in the state. We should get our mice tested, both for human safety in this project and for potential mouse impacts. Handling mice and mice living in human dwellings presents high risk of hantavirus exposure.	1		
30.	140		4.6.3	Need to think about whether we could have short-term impacts to Western Gulls. If mitigation measures work, we will not. But if they don't, could we? Gull risk assessment will help evaluate this.	1**		
31.	144		5.2.1	Add National Marine Sanctuaries Act	2		
32.	145		5.4	Will need to revise Public Scoping section.	2		
33.	147		5.7	Put in order by organization, then involvement: USFWS, IC, PRBO, NOAA. Add additional recent contributors, including Jan Roletto of NOAA-GFNMS for contributions to intertidal invert section.	3		
34.	A-2			Appendix B: Need to add other islets surrounding SE Farallon to wilderness. Wilderness includes all islands and islets besides SEFI.	2		
35.	A-3			Appendix C: Make sure species are in American Ornithologists' Union order (available online or check any recent bird field guide); Brandt's and Double-crested cormorants need to be switched, at least.	2		
36.	A-3			Add footnote for California Gull that they have only nested 2008-2010 thus far.	2		
37.	A-3			Add footnote that Peregrine Falcon and Common Raven re-established breeding in 2009 and 2010, respectively, and future breeding is expected.	2		

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38.	A-4		Appendix D	Appendix D: For Alt. B, need to include analysis of birds present in fall as well, since most implementation will be done if fall period!! Actually, Alt. B and C should have same risk profile. Alt C profile appears more complete. Also, risk categories are a little different which is confusing.	*1*		
39.			Appendix D	If we end up with separate tables for each alternative, give each a Table number (e.g., Table D-1, D-2) to help organize.	2		
40.			Appendix S	In table header(s), provide a clear description of what is included in the table and what they mean. E.g., what does “intitial risk” mean, or “primarily low risk; high risk during bait broadcast?” Species in bold font. These are unclear now.	2		
41.			Appendix D	Alt. B (others too?): Some categorizations on Appendix are confusing. How can a bird be a more common “Winter Resident” than in “Winter”, unless Winter really stands for Winter Arrivals (new arrivals that occur during winter). For example, Black-bellied Plover is considered “very rare”in winter but an “uncommon winter resident.”	1		
42.			Appendix D	Alt. B: To herbivores, add Brant because of our semi-resident bird “Molly”, and add Cackling Goose, which is in text. Cackling Goose is newly separated species from Canada Gose that may not have been covered in previous publications.	2		
43.			Appendix D	Alt. B: Why does Predators/Scavengers (initially high risk) not include bird predators. These will be at high risk if they prey on sick birds that have been exposed to rodenticide. Need to make sure exposure risks here match what was said in text.	1		

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	Page	Line	(Section)				
44.			Appendix D	Alt. B: Move the following species to initially low risk because their diets are mainly intertidal or marine inverts and/or fish: Heermann's Gull, Mew gull;	1		
45.			Appendix D	Alt. B: Are insectivores really high risk? Or are they medium to low risk?	1		
46.	A-9		Appendix D	Don't understand difference between "primarily low risk; high risk during bait broadcast," as well as other similar classifications.	1		
47.	A-23		Appendix E	Needs to be revised to remove Brown Pelican areas.	2		
48.							
49.							
50.							
51.							
52.							
53.							
54.							
55.							

Instructions

For each comment, list Page and Line number (Section number optional).

For awkward or inaccurate language, provide an example of alternative or more accurate language.

For spelling or grammar errors, enter the correct grammar/spelling for the relevant line(s) in the matrix when possible.

If appropriate, mark your comments with a Priority level:

- *Priority 1*: For major issues that may require discussion
- *Priority 2*: For factual errors, spelling errors, or other substantive issues that need to be changed
- *Priority 3*: For editorial suggestions

To add a line, place cursor in the bottom row and choose “Insert row below”.

Thanks!