

Comment Response Matrix

House Mouse Eradication from the South Farallon Islands:
Administrative Draft Environmental Assessment, May 2009

#	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.	ii	22	Exec Summary	Remove: “directly improve nesting and chick-rearing conditions for seabirds.” Indications are that this benefit would be minimal.	1		
2.	2	14	1.31	1909 designation also included Noonday Rock.	2		
3.	2	26-28	1.31	Visiting owls on island not “resident” on mainland (obviously, they migrate). I don’t think we really know where they come from. Shorten description to simply state “migrant”.	2		
4.	2	33-35	1.31	Check. I believe the mice don’t crash until late winter. Revise to reflect.	2		
5.	3	43	1.32	islands’s. Delete final “s”.	3		
6.	3	45	1.32	Delete “shifted”.	3		
7.	5	44-45	1.3.4.1	“breeding and nesting”; same thing - delete one or the other.			
8.	11	5	1.6.4.1	Delete “currently”. It’s going to stay that way.	2		
9.	11	11	1.6.4.1	Add “other visiting researchers” to list of people that utilize the island.	2		

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10.	11	18-20	1.6.4.2	California Fish and Game Commission recently adopted the North Central Coast MPAs. A no-take MPA called the “Southeast Farallon Island Marine Reserve” will completely encircle the South Farallon Islands. It’s just an administrative process now and should be officially in place within a few months (I heard goal is January 2010).	2		
11.	11	24	1.6.4.3	My understanding is that there is no evidence of prehistoric use of the islands, although I’m sure at some point some native American checked it out.	2		
12.	12	44	2.2	Currently, no native plants are being planted, but native plant seeds are being spread.	2		
13.	14	11	2.3.4	Change from “seabirds and pinnipeds” to “seabirds, sea lions and fur seals” since elephant seals don’t breed in summer.	2		
14.	15	9	2.3.5	Delete “and all immediately adjacent islets.” Islets covered in “South Farallones.”	2		

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15.	17	3	2.3.7	Define locally “large numbers.” Certain areas may have in the high hundreds or even on the order of about 1,000 animals (e.g., Shell Beach), mainly California sea lions.	2		
16.	17-18		2.3.7	I assume the possible mitigation actions you listed would not be render a “major” change in operations and thus would not require additional NEPA analysis. Yes? Suggest somehow indicating that.	2		
17.	17	40	2.3.7	Removal of bird carcasses, at least, should definitely be done. Will remove potential for exposure by scavengers and help keep track of new deaths.	2		
18.	18	19-20	2.4.1	Reorganize references in chronological order.	3		
19.	18	28	2.4.1	After “from spring through fall,” add “and most other times of year.”	2		
20.	18	37	2.4.2	In phrase “(such as seabird disturbance),” add: “, dislodging of rocks, erosion.”	2		
21.	19	2-6	2.4.3	Given how easy it will be for mice to traverse from treated to untreated areas (and vice-versa), accomplishing this could be nearly impossible. Adding another sentence to indicate this difficulty might be good.	2		

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22.	20	35-36	2.4.5	Replace “inaccessibly steep cliffs” with “such as those inaccessible areas noted above.”	2		
23.	20	38	2.4.5	Replace “but at least 25 percent of that land area is not accessible by foot” with “about 25 percent of that land area will be inaccessible for placing bait stations.” This is a more accurate statement.	2		
24.	21	34-36	2.4.5	Given that mice can move between untreated and treated areas, do you think this timeline is really plausible?	1		
25.	22	28	2.4.7	“Threatened” should be lower case.	3		
26.	22	Par. 1	2.4.7	Need to say something about seabird breeding season and seabird disturbance as well. With year-round bait stations, would overlap with seabird season as well. During seabird breeding season (roughly Mar 15 – Aug 15), bait stations would need to avoid sensitive seabird nesting areas.	1		
27.	25	42	2.5.6.2	More accurate to state that the seabird breeding season can range from mid-March through November (not October), but for most species the peak breeding season lasts from late April to mid-August.	2		

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28.	26	4-5	2.5.6.2	Need to add numbers for wintering gulls, which are in hundreds.	1		
29.	26	20	2.5.6.2	Immature elephant seals molt in the fall, mainly Sep to Nov. This isn't listed here.	2		
30.	27	28	2.5.8	Add "and marine mammals breeding/haulout sites."	2		
31.	29	11-16	2.5.12	We'll need to go beyond just signs. I suggest that anyone visiting the island be given written material with appropriate info and that they sign it before going to the island.	1		
32.	29	27	2.5.13	To "Aircraft", add "that land on the island."	2		
33.	30	21	2.7.1	Define "first generation" and "second generation" anticoagulants.	2		
34.	32	30	2.7.4	Trapping would also result in lethal capture of other non-target species.	2		
35.	34	26	3.1	Was manned USCG outpost until 1972.	2		
36.	35	20	3.2.2	The extensive north-south valley is called "Shell Beach", not Sand Flat. Sand Flat is on SEFI. Probably my mistake.	2		

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37.	38	15	3.4.2.1	We added another recent species in 2009, Peregrine Falcon, although they bred historically. Should change wording on number of species nesting to something like “recent”, because other species have nested historically, including Common Raven, Rock Wren (many nesting records), House Sparrow, Starling, and possibly Burrowing Owl.	2		
38.	38	43	3.4.2.1	In disturbance events, add that birds may simply abandon their breeding sites.	2		
39.	37	3	3.4.2.1	Change sentence to: “All but one species (Cassin’s auklet) raises only one brood annually...,” since birds sometimes lay a second clutch in the first clutch fails.	2		
40.	40	25		Change “resident” California Brown Pelicans to “migrant”.	2		
41.	throughout			Provide scientific names the first time a species is mentioned. In several cases, a species is only generally noted early (e.g., guillemots, pelicans) and then referred to later by full name (e.g., Pigeon Guillemot, Brown Pelican) followed by scientific name. State entire common name and scientific name on first mention, unless referring to a group of species.	2		

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42.	40	29	3.4.2.3	Start paragraph by describing breeding seabirds that occur in non-breeding season. Most disperse from island immediately post-breeding, but several begin to return in fall, including: Western Gull (some present year-round, but major arrival back in late Nov or early Dec); Common Murre (begin periodic visits in late Oct or early Nov), Cassin's Auklet (Sep or Oct, although some may be present year-round). Most cormorants disperse for fall-winter, with small numbers present. Storm-petrels begin to return in Feb (Ashy) or Mar (Leach's). Oystercatchers probably stay year-round.	2		
43.	41	10	3.4.2.4	Change to "native" birds, since non-native birds such as starlings, house sparrows, and rock pigeons are not protected under MBTA.	2		
44.	41	24	3.4.2.4	The proper term for brown pelican status is that they have been "proposed for delisting" by USFWS. This was done in Feb. 2008. Last I heard, this should be finalized this fall. CDFG delisted BRPE in June 2009.	2		

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45.	41		3.4.2.4	Need to add American Peregrine Falcon (<i>F.p. anatum</i>). They are federally delisted but still state listed as endangered, but are a “candidate” for state delisting. Peregrines are a migrant, and several (usually between 3 and 5 or so) individuals winter on SEFI. In 2009, the first confirmed breeding in several decades was recorded, so they’re now breeding. Breeding pair is likely resident.	1		
46.	41	30	3.4.2.4	The federal finding for ASSP, published in July or August 2009, is that listing is warranted but precluded by higher priority species; they were listed as a Federal Candidate species.	2		
47.	42	30	3.4.3.2	“salanders” should be “salamanders”	3		
48.	42	35	3.4.3.3	Delete “similar to birds.” Numbers of bats and frequency of bat sightings is nothing like birds.	2		
49.	43	6	3.4.3.4.	Add that camel cricket lives mainly in caves.	2		
50.	43	15	3.4.3.5	Add “American and” to “Russian sealers.” American sealers were actually there first.	2		

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51.	43	19	3.4.3.5	Change “non-native vertebrate” to “resident non-native vertebrate,” since non-native birds still visit.	2		
52.	43	38	3.4.3.5	Delete “Leach’s storm-petrel” from sentence. Although owl predation is almost certainly an impact, little evidence of owl’s taking Leach’s, mainly because there’s not enough Leach’s for owls to “prey heavily” on.	2		
53.	43	40	3.4.3.5	Clarify how presence of mice contributed to decline; i.e., by sustaining owls.	2		
54.	43	44-45	3.4.3.5	Clarify that house sparrows and starlings visit during migration and and in winter.	2		
55.	44	11-12	3.4.4	Add what they monitor, which is plants and invertebrates.	2		
56.	44	21	3.4.4	What does “seven were extended ranges” mean?	2		
57.	45	2	3.4.4	Not only is kelp not dominant in subtidal, I don’t think it even grows around the Farallones – at least I’ve never seen one.	2		

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58.	45	41	3.4.5	Change heading title to “Marine Mammals” since that’s all the section deals with and there are many other marine wildlife species, including seabirds.	2		
59.	45	43	3.4.5	Delete the “s” in “mammals”.	3		
60.	46	3-6	3.4.5.1	Revise sentence to: In recent years, monthly average counts on the South Farallones usually range from 1,000 and 4,000 animals (Sydeman and Allen 1996; PRBO unpubl. data).	2		
61.	46	5	3.4.5.1	Says that CA sea lions peak in spring. I don’t have Ainley and Allen 1992 handy, so maybe true in past. But in recent years, peak can occur almost any time, but spring is usually LOWEST numbers. Peaks usually in summer or fall.	2		
62.	46	14	3.4.5.2	Clarify that elephant seals present “on” and in surrounding waters year-round.			
63.	46	45	3.4.5.3	Delete “where food availability has declined.” This is actually in contrast to what seems to be going on, as some species are foraging more inshore these days.	2		

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64.	47	6	3.4.5.4	Change “are believed to have been” to “were”.	2		
65.	48	22-23	3.4.5.7	Revise sentence to: “Of the regularly occurring species, the Steller sea lion is also protected under the ESA.” Clarifying because Guadalupe fur seal and southern sea otter are also listed species. Should we need to mention that?	2		
66.	48	43	3.4.6	Revise sentence to: “...up the <i>south-facing</i> slopes of Lighthouse Hill and Little Lighthouse Hill.”	2		
67.	48	45	3.4.6	Revise sentence to: “...to native species <i>and habitats.</i> ”	2		
68.	49	8	3.4.6	Revise sentence to: “There are also three “cultivated patches” of bush mallow (<i>Lavatera arborea</i>), a non-native species, <i>near the housing units and near the east end of the Marine Terrace...</i> ”	2		

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69.	49	11-12	3.4.6	Revise sentence to: “Much of the <i>native</i> vegetation on the Farallones senescens or dies by the summer and rebounds in the early winter and spring when seasonal rainfall begins. <i>Several non-native species, such as spinach, grow actively nearly year-round.</i> ”	2		
70.	49	26-30	3.5.1	This is current designation, but see comment #10, above, and next comment.	1		
71.	49	35-36	3.5.1	Move “Between March 15 and August 15, boat traffic is also prohibited within 300 ft. of the shoreline” to paragraph above and indicate that it only applies to certain areas of the island. This is part of the Farallon Islands State marine Conservation Area, which also includes a speed limit of 5 kn within 1,000 ft of the islands and noise restrictions. The new regs will include a no-take marine reserve and a “Special Closure,” which will extend the boat closure areas to nearly encircle the island and extend the closure to year-round except for certain areas off the east end of the islands that will be open in the fall.	1		

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72.	49		3.5.1	Also need to mention that State of California regulates boating, fishing, and harvest of plants and invertebrates within 3 nm of the islands, which are considered state waters. This is where authority to establish marine protected areas comes from.	1		
73.	51	4-7	3.5.3	Revise. Have been approved. Marine reserve would encircle islands, but most of waters nearby will still be open to fishing.	2		
74.	52	11	3.5.4	Only the portion of the Cart Path between the houses and East Landing now exists.	2		
75.	55	8	4.2.3.2	Delete “the” from “of the either”	3		
76.	56	6-8	4.3.1.1	Is this still in effect? Obama admin has had some of those changes in regs overturned.	2		

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77.	57	38-39	4.3.2.4	I disagree that impacts will be minor. By frequently entering areas with sensitive habitat, seabird burrows will be trampled, rocks will be dislodged, and soil erosion will be increased – there’s no avoiding it. For the latter two, this will be esp. true on the rocky slopes, which currently have limited access to protect habitat.	1		
78.	59	3	4.3.3.4	Delete “and unconfined recreation” since this area is not accessed for recreation.			
79.	59		4.3.3.4	Add that, although steps would be taken to minimize possibilities, chances of future introductions of invasive plants to West End will be increased if visits to West End are increased.	2		
80.	60		4.4.2.1	Do we need to include state listed species in the analysis, i.e., American Peregrine Falcon? Even if we don’t have to, we should.	1		

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31.	61	47	4.4.3.2.1	Reference to Bird Species of Special Concern is: Shuford, W. D., and T. Gardali (Eds.). 2008. California bird species of special concern: a ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies in Western Birds 1.	2		
32.	62	37	4.4.3.3.1	Revise "...leading to abandonment..." to "...possibly leading to abandonment..."	2		
33.	62	38	4.4.3.3.1	Delete word "success".	3		
34.	62	40	4.4.3.3.1	Change "More worryingly" to "Of greater concern" or something better.	3		
35.	62	43-44	4.4.3.3.1	Change "...dispersing from their resident habitat in California's interior lowlands overshoot the coast, and..." to "migrating". We really don't know where they're coming from.	2		
36.	62	44-45	4.4.3.3.1	Delete "while returning to the mainland"	2		
37.	63	4-5	4.4.3.3.1	Replace "to breed" with "to begin prospecting for nest sites and courtship"	2		
38.	63	20	4.4.3.3.1	To "reproductive success", add "and survival..."	2		
39.	63	22	4.4.3.3.1	Delete "Unfortunately."	3		

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90.	63	33	4.4.3.3.1	Change “based on occasional surveys from the 1970s through recent years” to: “based on mist-net captures (PRBO, unpubl. data; G. McChesney pers. comm.)	2		
91.	68	33		“Therefor” (spelling)	3		
92.	72	31	4.4.4.2.2	Add Brant to the list. One Brant, nicknamed “Mollie”, has been resident on the island for years and seems to feed mainly on terrestrial veg.	2		
93.	75	21-22	4.4.4.2.2	Actually, most recent WEGU pop estimate for Anacapa was 10,274 breeding birds in 1991 (Carter et al. 1992). And the Sowls et al. citation is 1980, not 1990.	2		
94.	75	30	4.4.4.2.2	Are you going to add something about gull mortality at Rat Island?	1		
95.	75	33	4.4.4.2.2	Change “0.08 percent” to “0.02 percent”, based on revised population estimate in comment above. On issue with this percent mortality is that it assumes the entire Anacapa population was present and at risk to exposure. Any data on that?	2		

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96.	75	32-41	4.4.4.2.2	Assuming the percent mortality is correct, the number of estimated dead WEGU would be a maximum because this assumes the entire population will be present. Depending on gull attendance patterns during the application period, many gulls may not be attending territories, or at least not regularly. Hopefully we can mitigate for this with the gull attendance pattern data collected in 2008.	1		
97.	76 & 77	12; 25	4.4.4.2.3	Change “experimentally” to “accidentally”.	3		
98.	76	16	4.4.4.2.3	Change “occur on” to “occur on or adjacent to” because some of these species don’t come on the island but forage adjacent waters.	2		
99.	76	22	4.4.4.2.3	Put Western and Clark’s grebes as separate bullets.	2		

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00.	76		4.4.4.2.3	Since we are federal, we are supposed to treat Candidate species like we treat listed species. Thus, we should add an exposure analysis for ashy storm-petrels. They are small and dose needed for toxicity would not be that great. However, they only feed on on marine inverts and fish in offshore waters, so risk of exposure should be very low.	1		
01.	79	21	4.4.4.3.2	Add Brant (1 individual) to list of species.	2		
02.	86	37	4.4.5.2.2	Add “severe disturbances that cause animals to stampede,”	2		
03.	86	41	4.4.5.2.2	“During ‘the’ breeding season...” (add “the”). Shows up elsewhere, too; search document and correct.	3		
04.	89	2	4.4.5.3.1	Not “decades” unless the habitat was really trashed. Certainly for the season, and possibly in subsequent seasons of an unknown duration. On the other hand, destruction of rock crevice habitat could result in permanent habitat loss. Also applies to page 94, line 10.	2		

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05.	89		4.4.5.3.1	Need ashy storm-petrel analysis. Since they nest underground, general bait station checks would have negligible disturbance. However, habitat disturbance would almost certainly occur. Nest sites could be exposed when rocks are dislodged, causing birds to abandon nests, and breeding sites could be lost permanently.	1		
06.	91		4.4.5.3.3	Add that salamander habitat, such as rocks, will be effected from frequent trampling and dislodging of rocks. I disagree that the level of disturbance will be the same as currently; it will be more because of more frequent access to salamander habitats and broader coverage.	2		
07.	91	26	4.4.5.3.4	Add trampling of sensitive native vegetation to impacts.	2		

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08.	95		4.5.1.2	While this is true for Refuge visitors, hundreds of people go on pelagic birding trips every fall to see the flocks of thousands of ashy storm-petrels that congregate over submarine canyons off the central California coast, especially in Monterey Bay and in recent years over Bodega Canyon. Most of these trips leave from either Monterey or Bodega Bay. More storm-petrels means more birds for those people to enjoy.	1		
09.	95	34	4.5.1.3	Add: "For safety purposes..." to beginning of sentence. Ditto for line 45.	1		
10.	96	29-31	4.5.2.3	Revise based on info provided on adopted marine reserves. Off some parts of the island, esp. north and east, marine reserve boundary is not very far offshore, so need to consider distance. Ditto for section 4.5.2.4.	1		
11.	101-102		Table 4.9	In Disturbance section for seabirds and marine mammals, delete "minor" from "Minor, temporary disturbances..." but add that it will be to "non-breeding" individuals. Disturbances will be more than minor, but since they will only effect non-breeding individuals and will be done carefully, impacts will be low.	2		

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12.	102		Table 4.9	<i>Under Alternative C, "Other wildlife and plants.":, add possibility of spread of seeds on non-native, invasive plants.</i>	2		
13.	102		Table 4.9	Under impacts to burrowing owls in Alt. B, add that mouse eradication may lead to increased overwinter survival rates of burrowing owls since they won't stay for the winter.	2		
14.	109		6.2	Check for others; e.g., NPS is missing.	2		
15.	A-2		Appendix B	Wilderness map is incomplete. Missing other islets that are also wilderness. I'll have an updated map sent.	1		
16.	A-3		Appendix C	Add Peregrine Falcon to list	2		
17.	A-4		Appendix D	I believe the abundance index (except for "residents") refers to "arrivals"; in other words, numbers of new birds that arrive on the island. That explains how a bird can have an abundance index of "very rare" yet be "uncommon" in the "resident" category for the same season (the residents arrived during the previous season and stayed). This needs explanation in Methods.	2		
18.	A-5 to A-9		Appendix D	Abundances are for winter season, but Alt B would be conducted mainly during fall period (which ends Dec 19)	1		

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19.	A-9		Appendix D	For Brant, should be “Very rare” as winter resident. One Brant has been resident on the island for several years.	2		
20.			Appendix D	Many of these species which are insectivores or feed on other macroinvertebrates don’t fit into category “Predators/scavengers”. Either create another category or define category to include them; e.g., “Predators/insectivores/scavengers”	1		
21.			Appendix D	Many species that may be present during broadcast are not bolded. Essentially, almost any species that has winter residents will likely be present.	1		
22.			Appendix D	Some species included in more than one category; e.g., black and ruddy turnstones in both “predators /scavengers” and “Other terrestrial birds”	2		
23.			Appendixes F, G	The maps are actually not very good, and exclude a lot of areas for some species. I’ll try to get revised for the final but these may have to do.	2		
24.	A-40		Appendix J	Last sentence refers to Appendix J, which is this appendix. I assume more will be added later?	1		

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25.	A-41		Appendix K	First sentence starts “See Appendix K...,” which is this appendix. I assume more will be added later?	1		
26.							
27.							
28.							
29.							
30.							
31.							

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!