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Subject EPA comments on "Recommended Process for Alternatives Development, Farallon Islands Restoration Project - July 29, 2011"

Gerry/Dan - EPA's comments on this document, distributed at the July 29, 2011 cooperating agency meeting, are below. Please contact me if you have any questions or wish to discuss.

The process is a bit difficult to read and understand; simplifying it would be beneficial to the reader. We understand that this process will be included as an appendix in the EIS.

Purpose and Need: FWS will need to ensure that the Purpose and Need statement is not overly narrow and that there is sufficient data to demonstrate that ecosystem goals will be met only through mouse eradication. Since the underlying need appears to be increasing the population of the ash storm petrel, the EIS should discuss other factors that could be contributing to its decline when justifying the purpose and need, including possible explanations for the increase in petrel numbers that occurred from 1998 through 2007 in the presence of mice.

Evaluation Criteria: It is important that the alternatives development process establish objective evaluation criteria related directly to the Purpose and Need and develop some means to determine if the criteria have been satisfied. Therefore, definitions of the criteria and explanations on how they will be applied should be explicit in the process, and these are not currently present. Evaluation criteria should then be applied consistently to all potential alternatives to determine whether they are reasonable (i.e. will be carried forward as a fully evaluated alternatives in the EIS).

The document appears to identify the criteria as efficacy, availability of rodenticide, demonstrated success of technique, cost, and safety. It also seems to include potential for environmental impacts, although this part is less clear. Defining these environmental criteria would be helpful, such as toxicity to non-target species, exposure of non-target species, persistence of residues, potential to contaminate soil and water, etc. Another evaluation criterion appears to be the ability to implement the project in the next 1-2 years.

It is not clear why "demonstrated success of technique" is grouped with "availability" on top of p. 2. "Demonstrated success of technique" should be defined and the process should indicate how this criterion will be applied. Discussion should refer to the application method when applied to the targeted species, and discuss appropriateness of particular bait products. The 25W pellets are of a good size for aerial application and for acceptance by Norway rats, but they might be a bit large for house mice to carry off readily.

The process lists "availability" of the rodenticide as a criterion. As we recommended in our scoping comments, EPA believes the consideration of rodenticide products should not be limited to those currently registered for conservation use. Mouse eradication attempts have historically had a lower success rate than rat eradications so there is a need to continue to explore new and different products that might increase the probability of success. Registering new formulations of registered rodenticide chemicals as well as labeling registered formulations for island use (thereby creating a new product with a formulation that already has been registered) should be considered.

