



United States
Department of
Agriculture

July 26, 2011

Animal and
Plant Health
Inspection
Service

Gerry McChesney, Refuge Manager
Farallon National Wildlife Refuge
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Newark, CA 94560

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Riverdale, MD
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Subject: Wildlife Services (WS) Comments on Development of an Environmental
Impact Statement on the Farallon National Wildlife Refuge (NWR) Proposal to
Eradicate Non-native Mice

Dear Mr. McChesney:

This letter is a follow-up to the conference call you and I had with Shannon Hebert (WS NEPA Environmental Coordinator) on July 14, 2011, regarding your request for Wildlife Services (WS) assistance to the Fish and Wildlife Service (FWS) during the development of a draft Environmental Impact Statement (EIS) to address the need to eradicate non-native mice on the Farallon NWR. You extended an invitation to our agency to participate in a July 29, 2011 agency meeting at your office to discuss public comments from scoping and to develop alternatives to be evaluated in the EIS, including the proposed use of the rodenticide "Brodifacoum-25 Conservation." Please accept these comments as our initial input into the planning process for this EIS.

We (Wildlife Services) believe that the eradication of invasive rodents on islands has the potential for enormous conservation benefits, that the proposed use of brodifacoum may be warranted, and that it is a vital conservation tool for protecting native island habitats. However, we also recognize that an eradication project must be carefully planned to avoid unacceptable short- or long-term negative impacts as these could put the use of this tool for future invasive species management activities at risk. Therefore, we urge the FWS to proceed cautiously and to engage fully in the NEPA planning, partnering, and document development processes to help ensure that a full range of reasonable alternatives are considered and environmental impacts are identified. In this way, decision makers can make fully informed decisions about the best way to manage invasive species on the refuge while avoiding or mitigating unnecessary environmental harm.



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1. Scoping and Planning

We encourage FWS to utilize the expertise of a broad range of experts from its own agency as well as others. These could include the FWS Contaminants Office, Ecological Services, Pacific Islands Office, and other refuges, EPA Region 9, NOAA, and possibly other agencies with expertise in the EIS subject matter.

While FWS may have previously considered less toxic alternatives, those considerations were not communicated to us or to the public in the formal scoping notice. We believe that a proposal that involves only the most toxic remedies in its range of action alternatives is unacceptable. Broader and earlier discussions with the various agencies with expertise may have been helpful to FWS to create a more informative and productive public scoping process. We encourage FWS to partner with the agencies with expertise as early as possible and use NEPA to its advantage as a tool for productive planning and for making informed decisions.

When the time comes, we also recommend distribution of an agency draft EIS prior to the public draft comment period. This can help reduce conflicts and avoid pitfalls by addressing problem areas early on.

2. Need for Action

A detailed discussion of the underlying need for the project, including why the project is needed at this particular time, will help set the stage for the development of appropriate alternatives and help FWS and its partners identify the environmental issues that should be evaluated in the EIS.

The Service's April 26th, 2011 public scoping notice for the South Farallon Islands non-native mouse eradication project did not indicate that there is a compelling need for this project. While the notice mentions that eradicating non-native mice from the refuge may benefit seabirds, the Farallon arboreal salamander, and the Farallon camel cricket, the notice did not mention if any particular species was in decline or otherwise seriously threatened by the mice. Based on the July 14 telephone conversation, you indicated that mice were very abundant on the refuge and were attracting burrowing owls, which would later prey on seabirds when the mouse population cycled down each year. If the ash storm petrel is in need of protection, it may be beneficial to briefly discuss other threats to this species and the efforts of the FWS and other agencies to address these threats. These other actions, while possibly not within the scope of analysis of this EIS, will help to reveal if the intensive use of the proposed toxicant is truly warranted. In other words, the use of this product should be as a "last resort."

3. Environmental Issues

We suggest that the following environmental issues be evaluated in the EIS, however additional issues are likely to surface as more information about the project location and need for action is presented:

- How well do the proposed action and alternatives meet the objective of mouse eradication and the goals of long term benefits to seabirds and other native species on the refuge?
- What are the likely negative and positive non-target effects, including negative secondary and tertiary effects on terrestrial and marine wildlife, fish, invertebrates and plants?
- Might there be any risk to humans?
- What potential effects, if any, might there be on water quality, vegetation (direct and indirect) and soils?

4. Alternatives

Aerial broadcast of Brodifacoum-25 Conservation is proposed in the two action alternatives. We recommend that the FWS rigorously explore other action alternatives that minimize harmful environmental effects. These may potentially include:

- The use of bait stations in combination with other methods such as hand baiting in some areas to increase the precision of product delivery and reduce spillage.
- The use of diphacinone – as we discussed in our telephone call, which may involve evaluation of a new use formulation developed for mice. Exploration of less toxic alternatives is essential, given the high likelihood for significant adverse effects on burrowing owls and other raptors, gulls, and other species.
- Alternative means of managing owls such as hazing.
- The alternatives should include detailed mitigation to minimize negative project effects, and monitoring to assess the short and long term project effects.

5. Project Monitoring

The use of rodenticides to eradicate rodents on islands as a conservation tool is relatively new in the U.S. Consequently, there is a significant amount of data that needs to be collected to build the case that the benefits of these activities outweigh the potential risks. Each project presents a unique opportunity to help characterize environmental hazards and aid in the design of future eradication projects. As such, the following items should be considered in the Farallon NWR project.

- A strong monitoring effort for both eradication efficacy and ecological impacts should be included as an integral part of the eradication plan regardless of the chosen alternative.

- Monitoring must be adequately, if not generously funded, and should be identified at the onset of the project as a top priority action.
- We recommend that monitoring be performed by a team whose primary function is to carry out monitoring activities. Ideally the team would be from a third party that is not involved with project implementation.
- In addition to monitoring for negative environmental impacts, a monitoring plan should also outline what long-term monitoring would occur to document ecosystem response following removal of mice.

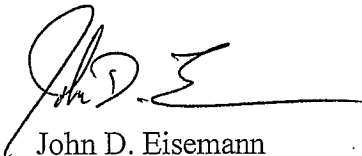
6. Biosecurity

- A detailed contingency plan to preclude the reestablishment of mice on the refuge should be included in the draft EIS.

As the registrant of the only brodifacoum labels currently approved for using broadcast application to undertake this type of a project, WS is very interested in the short- and long-term effects resulting from the application of this rodenticide. We have a great interest in ensuring the continued availability and safe use of this important management tool. At the same time, effective cooperation on the development of this EIS may require substantial technical review, analysis, and meeting time with my staff, as well as possible travel expenses, to develop alternatives, analyze environmental effects, and provide detailed document reviews. If FWS is interested in this level of participation from our program, we would ask for a written agreement which specifies the expectations and commitments of each agency and includes an agreement for reimbursement of a portion of our time, and full reimbursement for any travel.

We look forward to providing continued assistance with this project. Please direct future communications me (John.D.Eisemann@aphis.usda.gov), and Shannon Hebert, Environmental Coordinator (Shannon.M.Hebert@aphis.usda.gov).

Sincerely,



John D. Eisemann
Registration Manager

Cc: Karen Vitulano, EPA, Region 9