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To: gerry_mcchesney@fws.gov; [Dan Grout](#)
Subject: Brief comments on SEFI draft EA
Date: 06/10/2011 04:35 PM

Hi Gerry and Dan -

Below are a few unsolicited comments from a quick review of the draft EA. I realize an EIS is now in preparation, but I think many of the comments will still apply. Hope these are helpful - I'm curious to see what kind of feedback you get from the public sector.

-Sara

Comments on SEFI EA:

- Need to be specific (cite research/data) on how mice impact the Farallones. What specific damage do they do?
- Need to be clear that the claim that "mice are indirectly responsible for extensive ashy storm-petrel predation by burrowing owls" is a *theory* based on research and studies on other islands.
- May be useful to compare mortality numbers of ASSP by BUOW to mortality by WEGU.
- Need to substantiate claim that the "majority of owls that are monitored on the island through the winter do not survive" - this is something that could not be concluded for the owls tracked in the 2010-2011 winter/spring season on SEFI.
- Need citations for mice impacts to seabird eggs and burrows on SEFI.
- Indirect mice effects on inverts and plants is a guess at best. Insects (beetles) appear to be plentiful on the island in the fall - do we know what kind of insects the salamanders and mice are eating?
- What about the mouse eradication effects on WEGU? WEGUs eat mice too, so could a reduction in mice numbers affect WEGU nest success and WEGU predation on ASSP?
- The assumption is that owls will stay for a shorter period of time if there are no mice available. Be sure to note that this is a theory, since it is unknown what the resulting effects to the owls may be.
- How long is the trapping period for BUOW? It may take several weeks to capture most of the transient population, depending on weather conditions.
- Need to have a relocation and monitoring plan for the BUOWs that will be translocated to the mainland.
- Why are the PEFAs being held and the owls moved? Holding the owls until the danger has passed may be an opportunity to see if there are any preliminary effects of the mouse eradication on the owls, as long as most of the carcasses are removed/buried at time of release. With radio transmitters, one could track how quickly they leave the island post-eradication.
- At the very least, all captured owls should have leg bands placed on them.
- Also, the difference in treatment of BUOW versus other migrating raptors could be seen as an indirect way to remove the BUOW that is not related to specifically to the eradication process.
- Need to include monitoring specifically of BUOW after eradication, since it is key component to the overarching

purpose of the eradication and to determining its effects on the ASSP population.

- Is there any provision to collect BUOW and other raptor carcasses after the bait has been dropped and have a **forensic analysis** to determine if COD was due to the pesticide?

- In the Risk profiles table, BUOW is listed as "extremely rare" for abundance and "uncommon" for winter residents. This is from Richardson et al, 2003, but this is clearly incorrect today, as there were at least a dozen BUOWs recorded on the island.