

**From:** [Margaret Kolar](#)  
**To:** [Gerry McChesney](#); [Mendel Stewart](#); [John Bradley](#)  
**Subject:** Fw: 2 of 2 comments from OC's Ellen Paul re: baiting  
**Date:** 06/08/2011 03:23 PM  
**Attachments:** [ABC Palmyra Comments April 11 2011-1.pdf](#)

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fyi

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----- Forwarded by Margaret Kolar/SAC/R1/FWS/DOI on 06/08/2011 03:22 PM -----

**Mike Boylan/R7/FWS/DOI** To Margaret Kolar/SAC/R1/FWS/DOI@FWS  
cc  
06/08/2011 01:22 PM Subject 2 of 2 comments from OC's Ellen Paul re: baiting

----- Forwarded by Mike Boylan/R7/FWS/DOI on 06/08/2011 12:21 PM -----

**Ellen Paul <ellen.paul@verizon.net>** To Mike\_Boylan@fws.gov  
cc  
06/08/2011 11:23 AM Subject Availability of FWS emails, interviews/transcripts/notes in OC Rat Is. report?

Hi, Mike,

Yes, I know about the Palmyra project, too. I feel for Beth, having had to make this decision. Though at least there, they have a scientific justification for the amount of bait they are dumping. I was considering filing comments (personal comments, not on behalf of OC) but decided against doing so. The folks from APHIS are going to be on-site, monitoring everything very closely. So at least there can't be a repeat of the RI "plans? what plans? I don't remember any plans!" approach that led to the application of far more bait, far faster and in excess of label limits. I am assured by APHIS that they are very concerned about the continuing use of their label after RI and intend to keep a very close eye on things. Nonetheless, the potential to have non-target mortality of what should be an endangered species (Bristle-thighed Curlew) is very worrisome. I am attaching the comments Mike Fry of the American Bird Conservancy sent in...read the section about the metabolic fate and residue of brodifacoum.

Yes, you may certainly quote me, though I should hasten to add that it is qualified by "unless

there is something endemic that will be gone unless we act now..." It would not be appropriate to impose a moratorium where doing so might result in the extinction of an endemic or a significant part of a small metapopulation. That was NOT the case on RI and is not the case on many of these islands, where anything that was going to be affected by the rates is long gone, and anything that has persisted is likely to continue to persist.

Having an organization that relies on these contracts for its very existence making these decisions (yes, of course the final decision is up to the Service, but these are take-it-or-leave-it decisions; IC is not interested in doing the eradications with other methods or rodenticides because they don't want to risk failure) is problematic. I agree with those who say that this work ought to be done by Wildlife Services. For instance, some experts have said that they can and probably should try using diphacinone first, which will knock out nearly all the rats, and then "mop-up" with brodifacoum, and of course that would be a much smaller amount of brodifacoum, not only because it would be fewer rats, but also because those that had consumed some but not enough diphacinone would be more susceptible to a lower dose of brodifacoum. When I asked IC about this some time ago, they basically said that they weren't willing to try untested methods. Fair enough. They aren't being paid to try experimental methods. If the Service is willing to write a contract that specifies that the method is experimental, that would be a good way to give this a try, but the Service of course is not likely to want to spend very scarce resources on experimentation, either.

And of course, feel free to share my contact info.

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