

**From:** [Zachary Coffman](#)  
**To:** [Gerry McChesney](#)  
**Subject:** Fw: South Farallon Islands NEPA Scoping Comments  
**Date:** 05/18/2011 10:09 AM

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FYI

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Zach Coffman  
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----- Forwarded by Zachary Coffman/R8/FWS/DOI on 05/18/2011 10:09 AM -----

**Brian Dempsey**  
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05/10/2011 04:56 PM

To: "sfbaynwrc@fws.gov"  
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cc:  
Subject: South Farallon Islands  
NEPA Scoping Comments

Hello Gerry McChesney,

I am writing in response to the recent article in the Marin IJ regarding the plan to eliminate the non-native mice on the Farallon Islands. As I think this is a necessary and noble effort...it is one that should be pursued using Best-Practices approach with the intent of setting a new standard (Case Study) of eco-rehabilitation as well as great caution. **I am not going to be able to attend the meeting this Thursday do to a funeral I will be attending, so I would greatly appreciate you voicing my option listed below.**

I am not sure if you are aware of several studies that are being conducted in regards to massive effects this chemical rodenticide is having on food-chains, but there should be a high level of caution attached to any use of this chemical. It is my believe that the government is actually going to prohibit the sale of this chemical in Big-Box stores, but not prohibit the purchase of it through other avenues.

[http://www.msnbc.msn.com/id/40721227/ns/us\\_news-environment/t/highly-toxic-rat-poisons-killing-owls-other-wildlife/](http://www.msnbc.msn.com/id/40721227/ns/us_news-environment/t/highly-toxic-rat-poisons-killing-owls-other-wildlife/)

[http://www.msnbc.msn.com/id/40722528/ns/us\\_news-environment/t/decades-epa-verge-curbing-use-rat-poisons/](http://www.msnbc.msn.com/id/40722528/ns/us_news-environment/t/decades-epa-verge-curbing-use-rat-poisons/)

As a goal of this project is to help 'restoration of a healthy ecosystem' and you must consider the serious side-effects from the use of this chemical. With the islands being a critical habitat for endangered/protected species such as the Ashy Storm birds and even the Burrowing Owls (which have come to the island in search of these mice and even though it may not be native to the island, the island is still a habitat for this species), and use of this chemical should be prohibited because of its proven ability to escalate up the food chain. I am not a eco-lawyer, but any dead-loss of

either of those species could potential be grounds for legal implications, which I am sure you would want to avoid. And by migrating Burrowing Owls feeding on dead mice or Ashy Storm bird chicks eating the poison, you are sure to have higher numbers of juvenile death then the 12% that has been attributed to the mice in the first place.

There are alternatives to this poison and even other poisons that can be used that do not dramatically affect the rest of the food chain. If you are open to the idea of having a consortium of charities that would help with the cost of a project I propose the following alternative:

**Targeted Trapping** – a variety of mice traps (snap traps, electronic traps, live traps, glue traps) can be deployed in various control studies to determine the ones with highest success. After a 2 week test study, the best performing and most cost effective traps can be set in greater volumes (as well as strategically placed to maximize impact) to control and help exterminate the mice population. Taking into consideration that this plan will most likely not exterminate the mice population, then a strategic release of other less concentrated chemical control agent can be used. With this approach the project would greatly reduce any potential side-effects on other species and help to serve as a Case Study that can be utilized at other locations that have similar problems.

My motivation in contacting you is not to make your job harder, but to do the opposite. By making the most of this opportunity your group can create a Case Study that can be rolled out to several other places that are having the same type of problem. With the local community support (which I would be happy to help pull together), I am very confident that we all can figure out a Best-Practices approach to ‘helping restoration of the ecosystem’.

Please get back to me as I will also be contacting WildCare and Point Reyes Bird Observatory to try and set up a conference call or meeting to discuss this option as well as others.

God Bless,  
Brian Dempsey

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"If everyone thinks alike, then someone isn't thinking." - General George S. Patton Jr.