



SF Environment

Our home. Our city. Our planet.

A Department of the City and County of San Francisco



Edwin M. Lee
Mayor

Deborah O. Raphael
Director

June 23, 2014

Mr. Gerry McChesney
Refuge Manager
U.S Fish and Wildlife Service
San Francisco Bay National Wildlife Refuge Complex
1 Marshlands Road
Fremont, CA 94555

RE: Proposed mouse eradication effort in the Farallones

Dear Mr. McChesney:

As an agency of the City and County of San Francisco, the Department of the Environment (SF Environment) creates visionary policies and innovative programs that protect human health and lead the way toward a sustainable future. We are extremely proud to be named "The Greenest City in North America," and toxics reduction is one of the core components of our work. Included in this program is the citywide goal of reducing the use of pesticides that harm children, wildlife and the environment. We also have a biodiversity program charged with conserving the biodiversity, habitats and ecological integrity of San Francisco's natural environment.

The purpose of this letter is to express our deep concern over the Farallon Islands Mouse Eradication project, which calls for the use of approximately 1.3 metric tons of brodifacoum to be aerially dispersed from helicopters over the South East Farallon Islands. The Farallones are within the City & County of San Francisco, and this proposed project raises many troubling ethical and environmental questions. We feel that the project's risks to the City, local ecosystems, and the local economy outweigh its expected benefits.

The use of brodifacoum and other second generation anticoagulants (SGARS) have been extensively analyzed by the US EPA and California Department of Pesticide Regulation during the past few years. San Francisco took a leadership position on the environmental impacts of SGARS in 2007 by banning their use for most purposes on City-owned properties. In 2011, the Department of the Environment launched a citywide program, "Don't Take the Bait," which encouraged retailers to remove these dangerous products from their store shelves.

We concur with the opinions expressed by the US EPA, which submitted a comment letter dated Dec. 9, 2013 on the Revised Draft Environmental Impact Statement for the South Farallon Islands Invasive House Mouse Eradication Project, Farallon National Wildlife Refuge, California (CEQ # 20130300). We also concur with comments submitted by the American Bird Conservancy on the same docket. As a major metropolitan area neighboring the Gulf of the Farallones Marine Sanctuary, we are particularly concerned about the following issues:

1. Projected gull mortality. The REIS "worst case" scenario predicts 1,700 dead Western gulls, a number that we consider unacceptably high – especially considering the low likelihood of success. Yet the American Bird Conservancy and the Pesticide Research Institute suggest that the worst case estimate is optimistic. It is

San Francisco Department of the Environment
1455 Market Street, Suite 1200, San Francisco, CA 94103
Telephone: (415) 355-3700 • Fax: (415) 554-6393

Email: environment@sfgov.org • SFEnvironment.org

Printed on 100% post-consumer recycled paper.

known from the literature¹ that the effectiveness of hazing gulls falls off rapidly over time, with a 95% effectiveness at first decreasing to 73% at 15 minutes and 0% after one hour. However, the estimate of 1,700 dead gulls assumes a 75% efficacy in repelling the gulls. This project raises the spectre of dead gulls (or other birds) washed up on City beaches or at tourist destinations such as Fisherman's Wharf. Such a scenario would not only create significant economic and aesthetic impacts; it is also very much contrary to San Francisco's policies on natural resource protection and pesticide reduction, as manifested in legislation such as the Integrated Pest Management Ordinance (SF Environment Code, Chapt. 3).

2. The high tonnage of bait required (1.3 metric tons) and the unknown potential for impacts on the surrounding marine ecosystem. Brodifacoum is well known to be highly toxic to mammals and birds, raising the potential for adverse impacts on marine mammals. .
3. The poor chances of success in eradicating the mouse population. The bar for success is very high indeed in eradication projects. Literally every individual mouse must be killed. Otherwise, repeat treatments would be required, and these treatments would likely need to be extended indefinitely.
4. The unaddressed potential conflict of interest. As noted by the US EPA's comment letter, the organization that submitted the EIS, Island Conservation, would also likely implement the eradication. Yet no disclosure statement, required by 40 CFR 1506.5(c), specifying that Island Conservation has no financial or other interest in the outcome of the project has been filed.
5. The high uncertainty of success in protecting the bird species of concern, the ash storm petrel, even if the mice were successfully removed. Predicting the success of rodent eradication projects is historically difficult. The fact that house mice on the Farallones have only an indirect impact on the bird populations further clouds our ability to predict success, and casts doubt on the EIS assessments.

In summary, we feel strongly this project should not move forward with the currently favored option of using brodifacoum. We urge US Fish and Wildlife to revisit the environmental review process with an independent, third party review that does not have a financial interest in the project.

Sincerely,



Deborah O. Raphael
Director

¹ Jonas *et al.*, 2008. An evaluation of the non-lethal hazing of gulls (*Larus* spp.) at lower Columbia River dams, 2005. <http://www.nwd-wc.usace.army.mil/tmt/documents/FPOM/2010/Task%20Groups/Task%20Group%20Avian%20Hazing/Gull%20Hazing%20x01-02%20RS-ST.doc>

cc:

Maria Brown, Superintendent of the Gulf of the Farallones National Marine Sanctuary.
NOAA Gulf of the Farallones National Marine Sanctuary (Headquarters)
991 Marine Drive, The Presidio
San Francisco, CA 94129
maria.brown@noaa.gov

Dan Basta

Director of the Office of National Marine Sanctuaries Dan.Beast@noaa.gov NOAA National Marine Sanctuary Program
1305 East-West Highway, 11th Floor
Silver Spring, MD 20910

Bill Douros, Pacific Regional Manager of Sanctuaries, William.Douros@noaa.gov West Coast Region
99 Pacific St.
Building 200, Suite
Monterey, CA 93940

Dan Ashe, Director, USFWS.

dan_ashe@fws.gov
1849 C Street NW Room 3331
Washington DC 20240

Bryan Arroyo

Ass't Director of International Affairs
bryan_arroyo@fws.gov
1840 C Street NW Room 3331
Washington DC 20240

