

From: [Gerry McChesney](#)
To: [Philip Johnson](#)
Subject: Re: Rodent Eradication thoughts and recommendations
Date: 10/19/2012 02:35 PM

Philip,
Sorry for the delay getting back to you. Too swamped these days. Answers to your questions in CAPs below.

Gerry

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**Philip
Johnson/R7/FWS/DOI**

To: Gerry McChesney/SFBAY/R1/FWS/DOI@FWS
cc

09/26/2012 02:19 PM

Subject: Rodent Eradication thoughts and recommendations

Hi Gerry,

Good talking with you this morning and I really appreciate your willingness to share any thoughts you might have on:

1. Planning process:

- a. An over view of the process you followed, at least in abbreviated form, would be helpful.
THIS PROCESS WAS STARTED BY MY PREDECESSOR, SO INFO ON EARLY STAGE IS FROM MY UNDERSTANDING AS OPPOSED TO DIRECT KNOWLEDGE.
 - BEGAN WITH UNDERSTANDING OF THE PROBLEM AND NEED TO ADDRESS THE PROBLEM.
 - THEN IDENTIFICATION OF POTENTIAL METHODS THAT COULD BE USED SUCCESSFULLY.

- PUT TOGETHER A WORKING GROUP OF EXPERTS, INCLUDING THOSE WITH ISLAND RODENT ERADICATION EXPERTISE AND FARALLON ISLAND RESOURCES.
- IDENTIFIED A LIKELY FUNDING SOURCE FOR IMPLEMENTATION AND FUNDING SOURCE TO WORK ON DRAFTING AN EA.
- WHILE DRAFTING EA, IDENTIFIED POTENTIALLY SIGNIFICANT IMPACTS FROM ACTION. DECIDED TO SWITCH TO AN EIS.
- FOUND ADDITIONAL FUNDS TO HELP PREPARE EIS. WENT INTO A COOPERATIVE AGREEMENT WITH OUR ERADICATION EXPERTS, ISLAND CONSERVATION, TO DEVELOP EIS. OTHER MAIN PARTNER IS PRBO CONSERVATION SCIENCE, WHO HAVE BEEN STUDYING THE FARALLON ISLANDS WILDLIFE SINCE THE LATE 1960S.
- AS PART OF EIS PROCESS, WE HAVE ESTABLISHED RELATIONSHIPS WITH OTHER INTERESTED AGENCIES, INCLUDING EPA, USDA, CALIFORNIA DEPT OF FISH AND GAME, NOAA, USFWS CONTAMINANTS, AND USFWS PUPS COORDINATOR, AND HAVE BEEN GETTING FEEDBACK FROM THEM ON CERTAIN ASPECTS OF THE PROCESS.
- WE HAVE BEEN BRIEFING MEMBERS OF OUR REGIONAL OFFICE ON THE PROCESS AND FOLLOWING THEIR GUIDANCE.
- WHEN THE EIS PROCESS STARTED, WE ENLISTED THE ASSISTANCE FROM THE SOLICITOR'S OFFICE WHO HAS BEEN PROVIDING VALUABLE LEGAL ADVICE.
- IN RESPONSE TO PUBLIC AND AGENCY COMMENTS DURING THE EIS SCOPING PHASE, WE CONDUCTED AN EXTENSIVE ANALYSIS OF POTENTIAL METHODS TO ERADICATE MICE FROM THE FARALLON ISLANDS, CALLED THE ALTERNATIVE SELECTION PROCESS. WE ARE USING THE RESULTS OF THAT TO DEVELOP ALTERNATIVES FOR THE DRAFT EIS. THIS PIECE ITSELF TOOK ABOUT A YEAR.

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b. How long was the planning process, from start to finish? EA PROCESS STARTED IN 2007. EIS PROCESS STARTED IN SPRING 2011. WE ARE STILL WORKING ON DRAFT EIS.

c. If you were to start again from scratch, what type of idealized process would you follow, from "we've got a management problem" to working out an approach or competing approaches to solving that problem (in this case an invasive rodent), to bringing in other experts, at what stage you involve the public (e.g., public scoping for a NEPA document), to

- 1) IDENTIFY THE PROBLEM AND DEVELOP AND WELL DESCRIBED PURPOSE AND NEED.
- 2) DISCUSS WITH EXPERTS WHAT POTENTIAL OPTIONS

THERE ARE TO ADDRESS THE PROBLEM AND WHETHER IT HAS A HIGH ENOUGH LIKELIHOOD OF SUCCEEDING TO PROCEED WITH PLANNING.

3) IDENTIFY POTENTIAL IMPACTS FROM POTENTIAL ACTION ALTERNATIVES AND WHETHER POTENTIAL IMPACTS COULD BE SIGNIFICANT. MAKE DECISION ON EA VS. EIS.

4) IDENTIFY FUNDS FOR NEPA PROCESS WHILE PUTTING TOGETHER A TEAM OF EXPERTS ON ERADICATION, ISLAND RESOURCES, NEPA, LEGAL.

5) IDENTIFY WHO WILL DEVELOP NEPA DOCUMENT; DEVELOP COOPERATIVE AGREEMENT IF NOT ALL IN HOUSE..

6) PUBLISH NOI AND START SCOPING PROCESS.

7) DEVELOP PARTNERSHIPS WITH OTHER AGENCIES WITH EXPERTISE OR POTENTIAL REGULATORY AUTHORITY OVER THE PROJECT. GET THEIR INPUT EARLY AND THROUGHOUT THE PROCESS.

8) DEVELOP A COMMUNICATION PLAN, LED BY A COMMUNICATION TEAM, FOR DESSIMINATING INFORMATION TO THE PUBLIC ABOUT THE PROJECT. THIS CAN HELP ASCERTAIN APPROPRIATE INFORMATION, NOT MISINFORMATION, IS GETTING OUT AND APPROPRIATE TIMING.

9) CONDUCT THOROUGH REVIEW OF PUBLIC COMMENTS. USE THEM TO PLAN THE PATH FORWARD.

10) ASSEMBLE AS MUCH INFORMATION AS POSSIBLE TO BE INCORPORATED INTO NEPA DOCUMENT. HAVE EXTENSIVE REVIEWS OF PRELIMINARY DRAFTS BEFORE DISSEMINATING.

10) KEEP REGIONAL OFFICE BRIEFED AT CRITICAL JUNCTURES AND PROVIDE ADMIN DRAFT FOR THEIR REVIEW PRIOR TO PUBLIC DRAFT.

11) THEN DISSEMINATE TO PUBLIC.

d. Lessons learned through the process you did follow. This could be a separate set of thoughts, or folded in to the above.,

- DECISION AT START PROBABLY SHOULD HAVE BEEN TO DEVELOP AN EIS INSTEAD OF AN EA. SWITCHING TO EIS AFTER MUCH WORK HAD BEEN DONE WAS A MAJOR SETBACK AND HAS INCREASED COST DRAMATICALLY. WE BASICALLY STARTED ALL OVER AGAIN.
- DO NOT GO INTO CONTRACT OR AGREEMENT WITH A VENDOR THAT INCLUDES DEVELOPING NEPA DOCUMENT AND IMPLEMENTATION. WE DID THIS AT FIRST. AFTER IT WAS POINTED OUT TO US THAT THIS WAS AGAINST NEPA POLICY, WE CANCELLED AGREEMENT AND DEVELOPED A NEW ONE ONLY DEALING WITH NEPA DOCUMENT. AT THIS TIME WE HAVE NO PLANS FOR IMPLEMENTATION, IF THERE IS ONE, AND WILL NOT UNTIL NEPA PROCESS IS COMPLETE.
- GET NEPA AND LEGAL ADVICE THROUGHOUT PROCESS. WISH WE HAD DONE THAT MORE EARLIER.

- DO NOT MAKE ANY DECISIONS OR PUBLISH ANYTHING ON IMPLEMENTATION METHODS PRIOR TO GOING THROUGH EXTENSIVE NEPA DOCUMENTION, PUBLIC REVIEW, AND FINALIZING NEPA DOCUMENT. WE MADE EARLY STATEMENTS, INCLUDING IN OUR REFUGE CCP, ABOUT THE USE OF ONE METHOD, WHILE NEPA PROCESS WAS STILL IN EARLY STAGES. THIS COULD HAVE SUGGESTED WE WERE PRE-DECISIONAL. BETTER NEPA AND LEGAL ADVICE EARLY WOULD HAVE HELPED AVOID THIS.
- IT'S IMPOSSIBLE TO HAVE DATA ON EVERYTHING, BUT THE MORE DATA YOU HAVE TO HELP GUIDE THE PROCESS, THE BETTER.
- GET OTHER APPLICABLE AGENCIES INVOLVED EARLY.
- BE PREPARED FOR A MOUNTAIN OF WORK. BEST WOULD BE TO HAVE ONE FWS PERSON ASSIGNED, AND FUNDED, TO FOCUS ON COORDINATING THE PROJECT.
- BE REALISTIC ABOUT THE COST OF THE PROJECT FROM THE START. DON'T TRY TO DO IT CHEAPLY. NEED MONEY FOR RESEARCH, TRIALS, ETC. WE'VE SPENT A LOT OF TIME TRYING TO FIND MORE MONEY AS THE PROCESS GETS EXTENDED, WE FIND MORE RESEARCH QUESTIONS THAT NEED ANSWERING, AND THE NEPA PROCESS GETS EXTENDED.

2. BMPs: While every project will have different target species, logistical challenges, weather, habitat, etc., if you had thoughts about BMPs that might be helpful/instructive, particularly those that might translate across projects (more general considerations), I'd be interested in your thoughts and perspectives.

- HAVE A GOOD SENSE, AND HOPEFULLY DATA, ON WHAT YOUR NON-TARGET, AT RISK SPECIES ARE, WHAT THE POTENTIAL HARM TO THEM WILL BE, AND WHAT YOU CAN DO TO MINIMIZE THAT HARM. MUST WEIGH COSTS AND BENEFITS OF THE PROJECT. IF UNCERTAINTY IS HIGH, ERR ON THE SIDE OF CAUTION.
- MUST HAVE A BACKUP PLAN IF LOGISTICS OR WEATHER ARE NOT CONDUCTIVE.

Thanks very much for taking the time to give this some thought, as I imagine you have a lot of demands on your time as a Refuge Manager.

- Phil

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