



State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
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EDMUND G. BROWN, Jr, Governor
JOHN McCAMMAN, Director



June 10, 2011

Mr. Gerry McChesney, Manager
Farallon National Wildlife Refuge
U.S. Fish and Wildlife Service
9500 Thornton Avenue
Newark, California 94560

Dear Mr. McChesney:

Subject: South Farallon Islands Non-native Mouse Eradication Project

The California Department of Fish and Game's (Department), Bay Delta Region appreciates this opportunity to provide scoping comments pertaining to the proposed Environmental Impact Statement (EIS) associated with the South Farallon Islands Non-native Mouse Eradication Project. Because of the likely benefits to nesting ashy storm-petrels (*Oceanodroma homochroa*) and other flora and fauna, the Department supports Fish and Wildlife Service's (USFWS) goal to eradicate house mice (*Mus musculus*) from the islands. The draft EIS should clearly describe the background, purpose, and need for the proposed eradication and evaluate a reasonable range of alternatives that include measures to avoid and minimize the potential secondary effects of the proposed project on wildlife and the marine environment.

The Department has the following recommendations for issues which should be addressed in the document. Background information for these comments was principally derived from the Anacapa Island, California and Rat Island, Alaska rat eradication projects and subsequent research as well as similar efforts from New Zealand.

Because of the legitimate public concern over potential secondary impacts to mouse subsidized birds of prey, we suggest that the Background section of the document discuss historic use by those species as well as population trends of the breeding seabirds on the South Farallons which they may be adversely affecting.

Within your Purpose and Need section we recommend a thorough description of the mouse/bird of prey/seabird relationship with emphasis on the ways in which mice are directly or indirectly impacting native seabirds and other flora and fauna of the islands. Expected ecosystem benefits from the proposed project should also be described based on similar projects elsewhere.

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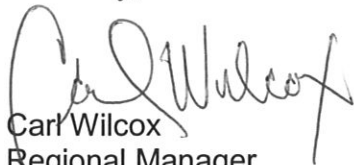
The Project Description should include a discussion of avoidance and minimization measures in light of previous projects which eradicated rats versus house mice. If methods are modified (i.e. smaller bait pellet size) in order to respond to a different target species then the potential adverse affects of those modifications on granivorous birds or other species should be assessed. Additionally, this section should delineate the measures and monitoring program for limiting secondary exposure to non-target species.

The effects analysis should include discussion of the mechanisms and time frames for mobilization and persistence of Brodifacoum within soil, water and the biota as well as consideration of whether these attributes may differ from previous projects because of environmental conditions.

The document should include a range of reasonable alternatives. A range consisting only of two alternatives, each of which relies exclusively on aerial application and on the same rodenticide, would not appear to meet this requirement. We recommend that USFWS develop a broader range of alternatives so that the public and decisionmakers have sufficient information regarding options for minimizing adverse impacts and can make a fully informed decision. Potential alternatives to the proposed project may include the use of less toxic rodenticides, such as diphacinone, different application methods (e.g., bait stations), different bait rates and strategies (e.g., varying quantity, duration, and timing), and combinations of the above. To the extent non-pesticide alternatives exist and are feasible, they should also be considered. If alternatives are eliminated from detailed study, the environmental document should briefly discuss the reasons for their elimination.

The Department looks forward to working with USFWS on developing a project to eradicate house mice from the South Farallon Islands while avoiding and minimizing secondary affects. If you have any questions regarding the above comments please feel free to contact. Mr. Conrad Jones, Associate Wildlife Biologist, at 650-328-2380 or cjones@dfg.ca.gov.

Sincerely,



Carl Wilcox
Regional Manager
California Department of Fish and Game
Bay/Delta Region