

**Draft email from Morkill to GFNMS SAC (12-2-13):**

Dear [fellow members of the Sanctuary Advisory Council]:

I want to thank you for the opportunity you afforded me on Nov. 20 to present an overview of the U.S. Fish & Wildlife Service's Draft Environmental Impact Statement (EIS) for our South Farallon Islands Invasive House Mouse Eradication Project. I also appreciate your thoughtful questions and concerns.

While I understand and endorse the necessarily limited time for back and forth in Council proceedings, I felt that there were a number of points that needed to be made in response to the Susan Kegley presentation that followed mine.

- First of all, the population of Ashy storm-petrels on the Farallon Islands is clearly in decline. Point Blue, our partner in the eradication project and the globally recognized expert on bird life on the Farallones, estimates that the population of storm-petrels is decreasing by about [7?]% a year. That decline has also been clearly linked to the presence of the invasive house mice and the raptors they attract.
- The Service's finding this fall that the Ashy storm-petrel does not warrant listing under the Endangered Species Act (ESA) does not undercut the case for mouse eradication on the Farallones. The ESA finding concerns the global population of the storm-petrel, not the specific, imperiled population on the Farallones, which the eradication project seeks to protect.
- The benefits of mouse eradication would not just be for one species (the Ashy storm-petrel), but would in fact benefit the entire ecosystem of the Farallon Islands by reducing threats to endemic Farallon arboreal salamanders, native invertebrates such as the endemic Farallon camel cricket, and native plants.
- The Service evaluated a full range of potential actions, as described in the Draft EIS, including trapping mice, introduction of disease targeted at mice, introduction of mouse predators, fertility control, Burrowing Owl relocation, alternate distribution methods for rodenticides, and others. Each of those options was measured against a set of criteria and ranked accordingly.
- A permanent strategy of Burrowing Owl relocation is not a viable alternative to mouse eradication. The owls would have to be relocated every year, which would require permanent staff to conduct the yearly operations and a permanent relocation facility, all of it maintained in perpetuity. [That would end up costing more than eradication of the mice.(??)]
- The danger of bioaccumulation of rodenticide in other wildlife is very low on the Farallon Islands. Unlike on the mainland, in commercial and residential operations where rodenticides have been extremely overused—week after week, month after month, in huge quantities—an eradication on the Farallones would be a one-time event under very controlled circumstances, conducted by people trained in conservation eradication.

- While the U.S. EPA and CA Department of Pesticide Regulation have restricted or proposed restrictions on commercial use of anti-coagulant rodenticides—for the very good reasons cited above—they have carved out specific exemptions for their safe conservation use in island eradications.
- The Draft EIS does *not* say that 1700 gulls would be taken as a result of mouse eradication. The report says that 1700 is the number of gulls that would have to be taken in order to have a population-level impact on the gulls of the Farallones. In fact, given the tremendous success of our hazing trials on the islands, we would expect gull take in an eradication effort to be well below that number.
- The threat to the marine environment would be minimal. Great precaution would be taken to minimize bait drift into adjacent waters, including the use of GPS and special dispensers to direct bait distribution above the Mean High Water level. No bait would be dropped on windy days. In the unlikely event that bait gets into the water, the concentrations would be extremely low and only available for the short time it would take for bait pellets to dissolve. The rodenticides are water insoluble and would sink to the ocean floor. What's more, most fish around the Farallon Islands are predatory or planktivorous, meaning they are unlikely in any case to consume bait pellets.
- The concern was raised that, if the mice are eradicated, the Burrowing Owls may simply feed on the Ashy storm-petrels. This concern is unfounded for the simple reason that the Burrowing Owls normal wintering behavior is to leave the islands before the storm-petrels arrive in winter. The only reason the Burrowing Owls are still on the islands when the storm-petrels arrive is because the mice, as a food source, keep them there longer than normal.
- One hundred percent removal of the mice is, indeed, achievable—as has been demonstrated in numerous conservation-driven mouse and rat eradications on islands around the world.
- The potential benefits of complete eradication have been amply demonstrated elsewhere—for instance, on Anacapa Island in the Channel Islands National Park, where, just \_\_\_ years after eradication, the ecosystem is thriving [cite examples of how: wildlife returning, etc.]

These are some of the more salient points that I felt needed to be made. As with you, my only goal is the effective protection of wildlife and habitat—and I believe good information is the foundation for that. I encourage you to visit the project's website, [restorethefarallones.org](http://restorethefarallones.org), for additional information. I have also attached a Frequently Asked Questions document which addresses the above points and others in greater depth.

Thank you for taking the time to look over this material. If you have any further questions or would like to see more information, don't hesitate to contact me at (510) 792-022, ext. 123, or at [anne\\_morkill@fws.gov](mailto:anne_morkill@fws.gov)

Sincerely,

Anne Morkill  
Manager  
San Francisco Bay National Wildlife Refuge Complex