Peer Reviews, Farallon Bait Degradation Trial Report

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The report provides some good evidence (at least for brodifacoum) as to the maximum amount of time the bait would remain in the environment in a palatable form for gulls - 17 weeks. As the conclusion states, bait will likely remain palatable for a shorter period of time during an actual broadcast event because of consumption by invertebrates and gulls, and the probability that rainfall totals will likely be hire than in the 2011 anomalous year. So their observations are likely to be conservative. It is not clear why the diphacinone bait did not degrade more quickly in the 2nd year, although the presence of slugs in the first trial suggests once cause. It is troubling that we don't know why this is; however, it might be less troubling if diphacinone toxicity to gulls is low, or diphacinone is excluded from further analysis because of its lack of efficacy on mice. Noted  
  
I do not understand how the numbers were derived in Figure 5. Either the slopes of the lines should be presented, if these slopes were based on the regression equations of the earlier analysis, and confidence intervals should be provided, or Figure 5 should be jettisoned altogether. The explanation of Figure 5 states that bait degradation will be approximately 100% by 5 weeks in a normal year, but I can't see where this number occurs in the empirical data. An explanation has now been provided in the figure title.

What I would like to see in this analysis (or subsequent analysis in the NEPA document) is an estimate of exposure to gulls based on how much bait is conservatively likely to still be around and palatable by the time the gulls start showing up in larger numbers to breed, followed by an analysis predicting consumption rates and subsequent mortality rates. This information is available in the gull risk analaysis.

Thanks for letting me review this - this is a great project and I hope it goes forward.

1. Stephen Kendrot, USDA-APHIS Wildlife Services, Project Leader, Chesapeake Bay Nutria Eradication Project

Thanks for the opportunity to review the report. I have a few small comments in the version attached. Toxicant applications are a little out of my wheelhouse, but the methodologies and analysis employed seem reasonable and straightforward. There are a couple references cited that aren’t in the lit cited. I note the report does not make an explicit recommendation despite the longevity of the Diphacinone baits. I presume that will be left to the decision-makers in the final NEPA document?

All comments addressed.