

Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

PSG Website: www.pacificseabirdgroup.org

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Public Comments Processing
Attn: FWS-R8-NWRS-2013: Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM
Arlington, VA 22203

To Whom It May Concern:

On behalf of the Pacific Seabird Group (PSG), this letter concerns the Draft Environmental Impact Statement (DEIS) for the South Farallon Islands Invasive House Mouse Eradication Project, Farallon National Wildlife Refuge, California. We support *Alternative B: Eradicate invasive house mice from the South Farallon Islands by aerial broadcast of rodent bait containing Brodifacoum-25D Conservation as the primary method of bait delivery.*

The PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. Our approximately 500 members—drawn from 20 nations—include biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation.

The second-generation anticoagulant brodifacoum has successfully been used to eliminate alien rodents for more than 20 years. The technique of scattering poisoned bait from a helicopter was developed by New Zealand conservationists and was first successfully employed in the United States in 2002 in a project that eradicated rats on Anacapa Island in the Channel Islands National Park. The PSG supported that eradication, and many of our members were involved in implementing and monitoring

that project. The Anacapa project has resulted in spectacular recovery of the target species, the Xantus's Murrelet.

The PSG also supported application of brodifacoum on Rat Island (now renamed Hawadax) in Alaska in 2008. Notwithstanding some issues with unexpectedly high incidental mortality of Bald Eagles and Glaucous-winged Gulls, the application resulted in elimination of the invasive Norway rat; native nesting birds, such as the "giant" Song Sparrow (*Melospiza melodia maxima*), have responded positively and are again nesting on the island in numbers. We are mindful of the lessons learned in that experience and the recommendations in the subsequent evaluation by The Ornithological Council¹ in 2010, and we encourage the Service to study the Rat Island case closely and take appropriate steps to minimize unintended consequences on the South Farallon Islands.

We believe that removing invasive species and restoring habitats so that seabirds and other native wildlife and plants can thrive is fundamental to the mission of the National Wildlife Refuge System. The Farallon National Wildlife Refuge comprises the largest seabird breeding colony in the contiguous United States, and eradicating house mice from the South Farallon Islands would eliminate the last remaining invasive vertebrate species on the refuge. Hence, PSG strongly supports Alternative B for the benefits that should result for the Ashy Storm-Petrel (*Oceanodroma homochroa*) and Leach's Storm-Petrel (*Oceanodroma leucorhoa*), as well as other rare native species, including an endemic salamander and cricket, and the ecosystem more broadly. One of the benefits of Alternative B is that it requires fewer applications and less helicopter flying time, which is so disruptive to seabirds.

As with the Rat Island experience, PSG recognizes there are risks in the application of brodifacoum or other poisons in terms of incidental short-term mortality and other unintended consequences, but we also firmly accept the premise that long-term benefits will accrue and that such actions are critical to enhancing resilience of the South Farallon Islands ecosystem in a changing marine environment. We specifically note that the Ashy Storm-Petrel is among the rarest storm-petrels in the world, and, if successfully implemented, this project should result in a significant boost for this species.

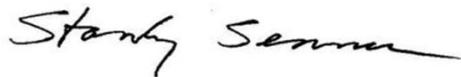
¹ The Ornithological Council. 2010. The Rat Island Rat Eradication Project: A Critical Evaluation Of Nontarget Mortality. Report prepared for Island Conservation, The Nature Conservancy, and U.S. Fish and Wildlife Service, Alaska Maritime National Wildlife Refuge. Bethesda, Maryland.

The PSG encourages the Service to closely monitor the status of Burrowing Owls on the South Farallon Islands and consider a multi-year trapping and removal program as a supplementary measure to further protect Ashy Storm-Petrels. In addition, there may be additional measures, such as sod removal, which are necessary to preserve access to the crevices in which Ashy Storm-Petrels nest.

In conclusion, PSG supports Alternative B, because the proposed techniques and rodenticide are proven and significant long-term benefits will accrue to rare species, such as Ashy Storm-Petrels, as well as to the South Farallon Islands ecosystem. We are confident that the Service and its cooperators have the expertise, as well as commitment to safety and environmental protection, necessary for a successful project.

Thank you, and please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Stanley Senner". The signature is written in a cursive, flowing style.

Stanley Senner
Vice-Chair for Conservation