

**From:** [Morkill, Anne](#)  
**To:** [Grim, Mary](#)  
**Cc:** [Long, Michael](#)  
**Subject:** Re: Quick thoughts on ashy storm-petrel  
**Date:** Tuesday, September 3, 2019 2:27:23 PM

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Thank you both, this is really helpful!

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On Tue, Sep 3, 2019 at 12:54 PM Grim, Mary <[mary\\_grim@fws.gov](mailto:mary_grim@fws.gov)> wrote:

I believe Mike is referencing the attached document. Currently most of the at-risk species work has been focused on species on our listing work plan, but we do anticipate working more on SWAP species in the future.

As for the comment, it seems you could respond that although petrel didn't meet the regulatory definition of threatened, it is an imperiled species, as evidenced by inclusion in the SWAP. And conservation of imperiled species and the habitats upon which they depend is a core element of the Service mission.

## **Mary Grim**

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On Tue, Sep 3, 2019 at 10:41 AM Long, Michael <[michael\\_long@fws.gov](mailto:michael_long@fws.gov)> wrote:

Hi Anne,

I have not located the At-Risk Species paper Mary put together, but I found something she had put together that indicated species that are addressed in State Wildlife Action Plan could be considered At-Risk Species. The ashy storm-petrel is included in the CA State Wildlife Action Plan (2015). Here is the wording we used in our species report when we

were evaluating whether to list the species, although it references an earlier edition of the SWAP (the latest version is 2015 and ASP is still in there):

"The California Department of Fish and Wildlife (CDFW; formerly California Department of Fish and Game) is the State agency responsible for managing California's fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. The ashy storm-petrel is designated as a Species of Special Concern by the CDFW (Carter et al. 2008, pp. 117–124). This status does not confer regulatory protection to the species, and applies to animals not listed under the Act or the California Endangered Species Act (CESA), but that nonetheless (1) are declining at a rate that could result in listing, or (2) historically occurred in low numbers and known threats to their persistence currently exist. In addition, this designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to: focus attention on the species to achieve conservation and recovery of these animals before they meet CESA criteria for listing as threatened or endangered; stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species; and focus research and management attention on the species. California Environmental Quality Act of 1970 (CEQA) does not regulate land use."

I'll chat with Mary and then we'll get back to you about ideas for addressing comments you received about ashy storm-petrel on the mouse eradication EIS.

Mike

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