



McChesney, Gerry <gerry_mcchesney@fws.gov>

Re: Draft final report and chemistry residue report

1 message

McChesney, Gerry <gerry_mcchesney@fws.gov>

Wed, Jan 10, 2018 at 7:10 PM

To: "Witmer, Gary W - APHIS" <gary.w.witmer@aphis.usda.gov>

Cc: "John Isanhart (john_isanhart@ios.doi.gov)" <john_isanhart@ios.doi.gov>

Hi Gary,

Apologies for the delay getting you comments. As I told you, I had a family emergency that took me away from work for a couple weeks and I'm having to play some catchup.

Attached are combined comments from both John and I. John's are the RSUs, while mine are the GJMs. As you'll see, we had a lot of comments and suggestions on the report draft. Generally, we found the report a bit hard to read and it was obvious it was written hastily. We realize you were under the gun to get us something. But before we can send this out for further review, we will need our comments addressed and the report revised for better clarity. This is a very important decision support document for the Farallon project and needs to be as clean and understandable as possible. We're hoping you can get it to a point where turning it around for publication won't be too much additional effort.

Along with comments in the document, here are a few of our major points:

- 1) We'd suggest having someone else at USDA with appropriate expertise provide a review of the report;
- 2) Some acknowledgment of baseline salamander health (e.g., stable weight prior to study initiation) needs to be made;
- 3) There are certainly sublethal effects that for some reason are not acknowledged. Skin sloughing and sores appear to us to be sublethal effects. It appears even just the bait formulation alone (w/ no rodenticide) poses some (albeit minimal) hazard to salamanders.
- 4) There's no discussion of if or how the salamander dermal exposure was standardized. E.g, how many pellets or total mass of pellets placed in the cage. I understand they tried to maximize exposure, but this point matters potentially; and
- 5) The analytical report needs to be included as an appendix.

After you've had a chance to look over our review, we can schedule a call to discuss if you would like.

I'm attaching a reference I added to your citations on plethodontid salamander phylogenetic relationships. We used this paper to help choose our species for the study.

Thanks again for all of your hard work and diligence on this project. I know it has had its challenges.

On Fri, Dec 8, 2017 at 1:27 PM, Witmer, Gary W - APHIS <gary.w.witmer@aphis.usda.gov> wrote:

Hi guys, Here is the draft final report and the residue report from our Analytical Chemistry Unit.

I have to apologize for an error I made on the conference call a while back. John asked me about necropsy results as relates to sub-lethal effects. I said that we did not do necropsies. That was sort of a "brain fart" as we did do necropsies on the Aneides and Ensatina salamanders. It was just the very small Batrachoseps that we did not necropsy.

Anyway, let me know what you think of the draft report and any suggestions/edits that you have. It was not an easy report to write! Gary

Note: I thought of adding a suggestion at the end of the report recommending that some Aneides salamanders be taken into captivity as a precaution before the mouse eradication, but I'm not sure you'd like that in there or even if it would be appropriate....and maybe you handled that in the DEIS. It would be in line with what was done on Anacapa when they took some raptors and endemic deer mice into captivity.

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Gerry

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2 attachments



Vieites et al 2011_Phylogenetic relationships in Plethodontidae salamanders_MolPhyloEvol.pdf
1036K



QA-2688 Final Report Salamander Anticoagulant Hazards Assessment_JI_GJM review.docx
501K