

CALIFORNIA COASTAL COMMISSION

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CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE

**Received between
April 7, 2021 and November 24, 2021**

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CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

**Letters from Elected
Officials and Organizations**

United States Senate

WASHINGTON, DC 20510-0504

<http://feinstein.senate.gov>

COMMITTEE ON THE JUDICIARY
- Chair, Human Rights and the Law

SELECT COMMITTEE ON INTELLIGENCE

COMMITTEE ON APPROPRIATIONS
- Chair, Energy and Water Subcommittee

COMMITTEE ON RULES AND ADMINISTRATION

July 26, 2021

Honorable Steve Padilla
Chair, California Coastal Commission
North Central Coast Office
455 Market Street, Suite 300
San Francisco, CA 94105

Dear Commissioner Padilla:

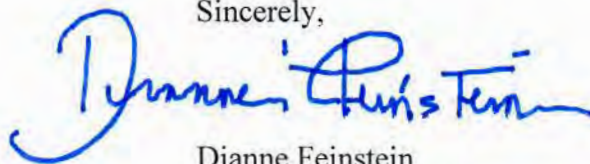
I am writing to the Commission to express my support of the upcoming request for a consistency determination for the U.S. Fish and Wildlife Service's (USFWS) plan to remove invasive house mice from the Farallon Islands. Their presence on the Islands have had significant impacts on the native seabirds, salamanders, crickets and other invertebrates, and plants. The full eradication of this invasive species is a critical next step in the restoration of the Islands' fragile ecosystem.

The Greater Farallon Islands are home to the largest seabird breeding colony in the continuous United States and play a critical role in a healthy marine system. Over the last 40 years, USFWS has removed many invasive plants and animals to preserve this sensitive habitat. More than 100 years ago, these invasive, non-native house mice were accidentally introduced. Since their introduction, the mice have had direct and indirect impacts on native species, particularly the ash storm-petrel seabird.

The only way to allow the ecosystem to fully recover is to ensure 100 percent eradication of the house mice. The survival of even a single pair of mice jeopardizes the whole project, as the population can recover very quickly. The aerial broadcast of the rodenticide Brodifacoum has been identified as the "preferred alternative" by USFWS in the Final Environmental Impact Statement published in March 2019. The one-time application by trained professionals for conservation purposes of this rodenticide has been proven to be safe and effective on nearly 700 islands worldwide, including on California's Anacapa Island in the Channel Islands National Park.

As such, I support leading science, conservation, and wildlife rehabilitation groups at the local, national, and international levels in supporting this house mice eradication project. If you have any questions, please do not hesitate to contact my office at 415-393-0707.

Sincerely,



Dianne Feinstein
United States Senator

DF/ab



Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

November 6, 2021

Steve Padilla, Chairman
California Coastal Commission
farallonislands@coastal.ca.gov

SUBJECT: Consistency Determination - US Fish and Wildlife Service, Farallon Islands Invasive Mouse Eradication Project, Farallon Islands National Wildlife Refuge

Dear Chairman Padilla and Commissioners:

The Marin Audubon Society strongly urges the California Coastal Commission to find the US Fish and Wildlife Service's (Service) project to eliminate nonnative house mice from the Farallon Islands to be fully consistent with the California Coastal Management Program. The project is fully consistent because it will restore the ecosystem of the islands. The ecosystems of more than 600 islands throughout the world have been restored by removing introduced rodents using the same treatment protocol the Service plans to use on the Farallones.

The Marin Audubon Society (MAS) was established in 1956. MAS has been instrumental in protecting wetlands and other natural lands in Marin County and for advocating to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats, for the benefit of humanity and the earth's biological diversity. We have approximately 1600 members and are affiliated with California Audubon and the National Audubon Society.

Our Conservation Committee and, subsequently, our Board of Directors have thoroughly studied the Service's proposal. We have had public meetings on the proposal and have heard from our members and the general public on the subject.

MAS's decision in favor of the Service's plan is based on the knowledge that:

- This *one-time-use* (two closely spaced applications) project is vastly different from the chronic use of rodenticides on the mainland, and it will have long-term benefits, restoring the island to a more natural state.
- Although adverse impacts cannot be avoided completely, these will be *short-term to individuals*, rather than having lasting effects at a population level.
- The preferred eradication alternative was chosen after *exhaustive scientific studies and analyses* as described in the Environmental Impact Statement. As numerous previous island

restorations around the world have demonstrated, there is only one way to eradicate the mice successfully.

In this time of global warming and other anthropogenic stressors to the natural environment, MAS looks forward to the Farallones being restored to a more nearly pristine state. Previous efforts by the Service and Point Blue Conservation Science have successfully removed feral cats and European hares from the Farallones, which had been introduced by the early lighthouse keepers. The removal of these mammals was followed by the exponential increase of tufted puffins and the return of the previously extirpated rhinoceros auklet. But the non-native mice on the Farallones, also introduced by humans, still impact the natal home of over a quarter of the seabirds in California.

While MAS is opposed to the commercial and private chronic use of rodenticide on the mainland, we recognize that this one-time and controlled use for conservation purposes (using a formulation specially approved by the EPA for such island conservation purposes) is acceptable in this instance and in keeping with integrated pest management (IPM) principles.

There is no evidence that a contraceptive approach to eradication is available, proven, or even feasible. Contraception might work as a method of *control* (e.g., to reduce rat populations in a food warehouse), but not *eradication*, which is what is required on the Farallones. Infertility is temporary and would be reversed over time. Further:

- A contraception chemical has only been tested and approved for rats, not house mice.
- The chemical for rats is delivered in their drinking water, which rats regularly use. Mice get most of their dietary water from the food they eat and would not eat a potential contraceptive bait regularly and consistently enough for it to be effective.
- If a potential technically suitable product could be developed for mice, the timeline for it to be tested and approved for field use on the Farallones is unacceptably long.
- The chemical would have to be delivered in bait stations, which were rejected in the Service's FEIS; many areas are not accessible without risking human safety.
- The significant disturbance that would occur from the frequent visits to service the *many thousands* of bait stations that would be necessary is unacceptable in a bird rookery.

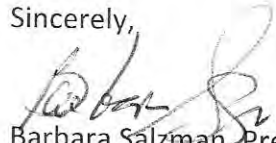
In short, contraception has not been used on islands, even with rat infestations, because it does not work.

MAS is pleased to join other leading organizations involved in marine conservation in support of the Service's plan. These include Point Blue Conservation Science, Audubon (Marin, Golden Gate, Sequoia, California, and National), The Nature Conservancy, American Bird Conservancy, Island Conservation, BirdLife International, and many other recognized groups at the local, state, and national level.

Now is the time to remove the last remaining introduced mammal to further restore these islands known as "California's Galapagos."

Thank you for considering our input.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Barbara Salzman', written over a light blue horizontal line.

Barbara Salzman, President
Conservation Committee Co-chair

A handwritten signature in dark ink, appearing to read 'Roger D. Harris', written over a light blue horizontal line.

Roger D. Harris, Director
Conservation Committee Co-chair

November 4th, 2021



California Coastal Commission
45 Fremont Street
San Francisco, CA 94105

Email: Farallonislands@coastal.ca.gov

SUBJECT: Consistency Determination (#CD-0006-21) - US Fish and Wildlife Service, South Farallon Islands Invasive House Mice Eradication Project, Farallon Islands National Wildlife Refuge

Dear Commissioners:

The Marin Conservation League (MCL) recommends that the California Coastal Commission concur that the US Fish and Wildlife Service's (Service) project to eliminate nonnative house mice from the Farallon Islands is fully consistent with the California Coastal Management Act.

MCL is a well-established conservation organization in Marin County with an 87-year history of environmental advocacy. The Farallon Islands, the largest seabird rookery in the contiguous US, is immediately off our Marin shore.

In coming to the decision to support the Service's restoration plan for the Farallones, MCL considered the plan at two meetings of our Land Use and Transportation Committee. At one meeting, Zach Warnow of Point Blue Conservation Science and Roger Harris of the Oceanic Society described the project. At a second committee meeting, Richard Charter of The Ocean Foundation and Loretta Mayer of SenesTech presented criticisms of the Service's plan along with a proposal for mouse contraception rather than lethal take. We also heard from some of our 700 members and seriously considered their input.

The full MCL board heard an initial introduction to the Service's plan followed by discussion at two subsequent board meetings. MCL reviewed the environmental documentation and commentary both for and against the plan, before voting in its favor.

MCL's decision in favor of the Service's plan is based on the understanding that:

- This *one-time-use* (two closely spaced applications) project is vastly different from the chronic use of rodenticides on the mainland, and it will have long-term benefits, restoring the island to a more natural state.
- Although adverse impacts cannot be avoided completely, these will be *short-term to individuals*, rather than having lasting effects at a population level.
- The *exhaustive scientific studies and environmental documentation* researched and analyzed the alternatives thoroughly before drawing a conclusion on a preferred alternative. As numerous

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mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

previous island restorations around the world have demonstrated, there is only one way to eradicate the mice successfully.

In this time of global warming and other anthropogenic stressors to the natural environment, MCL looks forward to the opportunity to restore the Farallones to a more nearly pristine state. Previous efforts by the Service and Point Blue Conservation Science have successfully removed feral cats and European hares from the Farallones, which had been introduced by the early lighthouse keepers. The removal of these mammals was followed by the exponential increase of tufted puffins and the return of the previously extirpated rhinoceros auklet.

Similarly, under the protection of the Marine Mammal Protection Act and other international statutes, gray, humpback, and blue whales are returning in large numbers to the Gulf of the Farallones, and the previously extirpated northern elephant seal and the northern fur seal are again pupping at the islands.

But the non-native mice on the Farallones, introduced by humans, still impact the natal home of over a quarter of the seabirds in California. The mice may predate on the endemic Farallon camel cricket and on the eggs and adults of the endemic Farallon arboreal salamander as well as compete with it for invertebrate food. The mice feed on native vegetation, promoting non-native plants, and may attack the nestlings of native seabirds.

Most concerning is the dynamic of mice attracting migratory burrowing owls, which then settle on the Farallones to prey on the mice. The owls subsequently feed on ash and Leach's storm-petrels when the mice population seasonally crashes. Some half of the world's population of ash storm-petrel nests on the Farallones. Although the petition to list this rare species as endangered was denied, the rationale for denial included the assumption that a mouse eradication program was to be implemented on the Farallones. As population modeling by Point Blue Conservation Science indicates, the ash storm-petrel is on downward curve toward extinction. MCL urges action now, before this native seabird becomes endangered.

After comprehensively considering 49 different chemical, mechanical, and biological removal methods, the Service concluded that only application of Brodifacoum 25D Conservation would achieve the goal of eradicating the invasive rodents. While MCL is opposed to the commercial and private chronic use of rodenticide on the mainland, we recognize that this one-time and controlled use for conservation purposes (using a formulation specially approved by the Environmental Protection Agency (EPA) for such island conservation purposes) is acceptable in this instance and in keeping with MCL's integrated pest management (IPM) policy.

A contraceptive approach to eradication is unavailable, unproven, and infeasible. Contraception might work as a method of *control* (e.g., to reduce rat populations in a food warehouse), but not *eradication*, which is what is required on the Farallones. Infertility is temporary and would be reversed over time. Further:

- A contraception chemical has only been tested and approved for rats, not house mice.

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- The chemical for rats is delivered in their drinking water, which rats regularly use. Mice get most of their dietary water from the food they eat and would not eat a potential contraceptive bait regularly and consistently enough for it to be effective.
- If a potentially technically suitable product could be developed for mice, the timeline for it to be tested and approved for field use on the Farallones is unacceptably long.
- The chemical would have to be delivered in bait stations, which were rejected in the Service's Final Environmental Impact Statement (FEIS); many areas are not accessible without risking human safety.
- The disturbance that would occur from the frequent visits to service the *many thousands* of bait stations that would be necessary is unacceptable in a bird rookery.

In short, contraception has not been used on islands, even with rat infestations, because it does not work.

MCL is mindful that the one-time use of rodenticide would cause suffering to mice and possibly to a limited number of gulls and other non-target species, though the numbers are expected to be low. The application will be followed by an approximately 2-year monitoring of the islands, where spot treatments may be made if any mice are found to persist in isolated pockets.

We also understand that this human-introduced population of non-native rodent is without effective natural population controls. Consequently, when green vegetation seasonally dries up on the Farallones, the mice are subject to mass starvation and cannibalism and so suffer on an annual basis. In addition, mice have been known to feed on the living flesh of seabirds on the nest. Having evolved without mice, these seabirds' natural response to threat is to freeze on the nest rather than flee or combat the mice. See this video: <https://www.youtube.com/watch?v=mTvcGU0FdMA>.

If there were a feasible non-lethal means of removing the introduced mice, surely the many highly trained scientists who have worked on this project for decades and have dedicated their lives to the restoration of the Farallones would have embraced it. They have no interest in promoting rodenticide use for its own sake. And, in fact, they have been among the state leaders in opposition to the chronic use of pesticide on the mainland.

MCL is pleased to join other leading organizations involved in marine conservation in support of the Service's plan. These include Point Blue Conservation Science, Audubon (Marin, Golden Gate, California, and National), The Nature Conservancy, American Bird Conservancy, Island Conservation, BirdLife International, and many other recognized groups at the local, state, and national level. Internationally esteemed seabird scientists and conservationists such as David Ainley and Peter Pyle support the plan.

MCL recognizes the Service has prepared one of the most thorough and scientifically rigorous EIS documents on record, representing years of research, 322 pages, supported by a 577-page appendix, and responding to 553 public comments. The methodically vetted plan draws on long-term studies starting in 1968, with planning for the invasive mouse eradication dating back to 2004.

Under the administration of the Service and the stewardship of its science partner, Point Blue Conservation Science, the Farallones are distinguished as being the biologically most extensively studied and monitored islands in the world. Now is the time to remove the last remaining introduced mammal to further restore these islands known as “California’s Galapagos.”

Thank you for considering our input.

Sincerely,



Robert Miller
President



Susan Stompe
Chair, Land Use and
Transportation Committee



Roger D. Harris
Director



Madrone Audubon Society

INCORPORATED

Submitted by email June 21, 2021

June 20, 2021

Mr. Cassidy Teufel
Senior Environmental Scientist (Supervisory)
Energy, Ocean Resources & Federal Consistency Division
California Coastal Commission
455 Market St., Suite 300
San Francisco, CA 94105

Re: Comment of Opposition - US Fish and Wildlife Service 2021 Draft Bait Spill Contingency Plan, Draft Non-Target Species Contingency Plan, and Draft Mitigation and Monitoring Plan (for Commission's Staff Recommendation Packet - proposed US Fish and Wildlife Service South Farallon Islands Invasive House Mouse Eradication Project)

Dear Commissioners:

Madrone Audubon Society, a 501c3 nonprofit conservation organization, serves approximately 3000 members in Sonoma County and the San Francisco Bay Area. Also a Chapter of National Audubon, our organization has been in Sonoma County for 54 years. We have a long record of significant conservation activities and education related to birds and wildlife. Our Chapter's geographic coverage includes the extraordinarily special Sonoma County coastal area.

California Coastal Commission's mission is described as "...protecting and enhancing California's coast and ocean for present and future generations. It does so through careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination." The Commission engages in outreach on environmental justice and expresses recognition of the importance of indigenous peoples' history and input to Commission decisions and actions.

The global Climate Emergency adds the critical importance informed and timely decisions and recommendations by your Commission.

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<http://madroneaudubon.org>

The proposal for distribution of a 2nd generation anticoagulant poison, Brodifacoum, over the South Farallon Islands is ill-advised and presents high risks. Our review of the Consistency Determination and associated plans, such as the mitigation and monitoring plan and non-target species monitoring plan, indicates general guidelines and/or recommendations without sufficient plan details to ensure a satisfactory level of success and safety.

Comments dated June 17, 2021, from Ocean Foundation to the California Coastal Commission refer to deficiencies in the US Fish and Wildlife Service's proposal and associated plans. Madrone Audubon Society supports these comments and agrees with the Ocean Foundation.

For as many as 15 years or longer, a discussion about poison dissemination over the Farallon Islands has circulated among Audubon Chapters and other organizations. A description of mice appearing to be in "waves like grass" has been included in discussions for at least that long. Recent news articles in Marin County and San Francisco have incorrectly indicated the Biden Administration "revived" the US Fish and Wildlife Service plan for poison dissemination to eradicate mice on the islands. Proponents continue to state the Brodifacoum drop is the only solution to address the problem. In some settings, proponents have indicated if an effective fertility control product for mice were to be available, then of course they would consider that as a viable pathway, but they state no such product exists. Therefore, they claim the Brodifacoum distribution over the South Farallon Islands, with predicted significant non-target species by-kill, is the only possible solution to eradicate the mice.

A more contemporary approach with potential success is comprised of a fertility control product for mice. The production name "TLC" is under development by Dr. Loretta Mayer and her research and development team. "TLC" is developed from product criteria for island use: Efficacious in mice; solid, palatable and suitable for the environment; non-threatening to secondary species exposure (rapid metabolism in mice); will not significantly persist in soil or water; and will be delivered specifically to attract mice, harmless to other species, including birds, reptiles, aquatic mammals and fish.

The status of development is a planned field trial in July 2021 to conduct baseline data collection. In ongoing conversations with the EPA Office of Pesticide Programs, with an Experimental Use Permit, in September 2021, a final field trial is targeted to commence in the County of Los Angeles. The team's development timeline indicates sufficient efficacy data will be collected within 6-8 months. Application and product registration can be expected 6-9 months following the submission, estimated late 2022. The schedule is experience based and associated with Dr. Mayer's team working with a team of stakeholders committed to a rigorous timeline.

According to Dr. Mayer, a fertility control product with efficacy and palatability the team has experienced has not been tested for eradication, but generally for population control and managed low numbers to prevent re-infestation in open areas. Theoretical models conclude that

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constant blunting of reproduction without re-introduction will result in eradication: the mechanism of extinction. An island that does not provide a pathway for re-introduction via boat, air, or greater than 10 miles from a mainland is considered by Dr. Mayer's team to be an ideal location to test the hypothesis that fertility control can be used for safe eradication of an invasive species such as the mice on the Farallon Islands. The fertility control product, combined with carefully planned relocation for the 6-8 over-wintering Burrowing Owls, and an approach carefully administered and monitored, would be low risk without the possibility of poisoning non-target species, high numbers of by-kill, and the risk of infiltration of the food chain or spreading into the marine sanctuary ecosystem. Added to this alternative approach should be efforts to enhance and protect Ashy Storm-petrel nesting sites and continued monitoring of the Ashy Storm-petrel population during the alternative project.

Such an approach would be advised to be documented on video or film to exemplify California's leadership in a 2021 solution to reduce and eliminate invasive species from an island ecosystem, without the serious negative impacts and high risks associated with a Brodifacoum drop.

Madrone Audubon has had the opportunity to communicate with a talented documentarian who has introduced us to an innovative Burrowing Owl project in the South Bay. This project documented intricacies and stages of a control study to carefully reintroduce Burrowing Owl pairs in native habitat. The project has proven to be promising with positive results to date.

The mitigation and monitoring plan for Burrowing Owls submitted to the Commission by the US Fish and Wildlife Service appears conceptual and thin in details, without sufficient descriptions or predicted outcomes.

The Santa Clara Valley Habitat Agency encompasses the Farallon Islands in its geographic coverage. The Regional Habitat Conservation Plan of the South Bay was completed in 2014. Burrowing Owl is a target species in the plan, which also provides federal and state permit coverage and conservation for 12 additional species. The larger program of this plan is a specific Burrowing Owl conservation strategy.

The Santa Clara Valley Habitat Agency oversees Conservation Actions identified within the Regional Habitat Conservation Plan.

Goals for the Burrowing Owl conservation strategy include: (1) Protect Burrowing Owls where the owls exist, secure and manage current nesting locations; (2) find ways to allow Burrowing Owls to expand into more natural areas - sustainable for the owls; (3) Bolster current population - managing species, ground squirrel populations - with supplemental feeding to boost reproductive rate, and carefully monitor.

The Agency's captive over-wintering project for Burrowing Owls is similar to projects in Canada and/or British Columbia. The over-wintering project is a primary focus of the Conservation Plan, as most Burrowing Owls that hatch will experience the highest mortality rate in their first year during the first winter, especially in migration. The captive over-wintering

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project is designed to help boost the breeding population within Santa Clara County. Taking some owls who are first year hatchers into captivity, over-wintering at the Peninsula Humane Society facility with a specially designed aviary for the owls, the following spring, the owls are released back into breeding grounds with continued supplemental feeding as necessary. This pattern of care is consistent with a Burrowing Owl's natural life cycle and seasonal behaviors.

All Burrowing Owls released through the project are carefully monitored by a group of scientists. Pairing of Burrowing Owls, observing how Burrowing Owls remain where released and successful hatching of chicks on a small scale support re-establishment and sustaining of the owls in their native habitat. Compare the description of this Conservation Plan and the Burrowing Owl strategy with the thin-in-detail description provided to the Commission in the US Fish and Wildlife Service mitigation and monitoring plan. The Service proposes to relocate Burrowing Owls from the South Farallon Islands to Don Edwards Wildlife Refuge, Warm Springs Unit. Note there was no mention in the Service's mitigation and monitoring plan of coordination with the California Department of Fish and Wildlife.

For Burrowing Owls to survive and establish in habitat areas that need repopulation in the Bay Area, and to decrease the probability of a return to the Farallon Islands by 6-8 Burrowing Owls traveling there, a carefully planned and coordinated program carried out by scientific experts over an appropriate period of time would create a best opportunity for success.

According to participants in the Burrowing Owl Project of the Regional Habitat Conservation Plan, efficacy of translocating overwintering owls is lower than if they were breeding. If they were breeding, it is possible that owls could be moved, paired up at the new location, and then would be more likely to stay once they initiated nests. Such a consideration is similar to how release of owls works during captive breeding or captive over-wintering. If over-wintering owls are moved, they may just fly away, not having anything, like a nest to hold them there. With involvement of the California Coastal Commission in this important decision related to safety and health of our marine ecosystems and the South Farallon Islands proposal, the absence of mention in the mitigation and monitoring plan of the California Department of Fish and Wildlife is of concern. Details of a plan, seasonal behaviors of the owls, necessary permits beyond Migratory Bird Special Use Permits would all relate to a coordinated timeline of planned actions to relocate Burrowing Owls from the South Farallon Islands.

According to a representative of the Santa Clara Valley Habitat Agency, the Don Edwards National Wildlife Refuge has supported Burrowing Owls in the past and there have been nesting Burrowing Owls at the refuge. In the past five years, the Santa Clara Valley Habitat Agency has partnered with the National Wildlife Refuge to manage portions of the Warm Springs Unit for owls and to monitor nesting activity. While there continue to be some wintering owls, nesting activity has not increased due to management and has, in fact, declined. Burrowing owls are not routinely selecting Warm Springs as a location to nest or over-winter in great numbers. If owls are not naturally persisting there, it could be quite challenging to try and facilitate nesting or over-wintering in greater numbers. This also could mean, following translocation, the owls will leave, go somewhere else, or return to the Farallon Islands. Our understanding is, if Burrowing Owls were relocated to the Don Edwards National Wildlife Refuge, Warm Springs Unit, the Santa Clara Valley Habitat Agency could be involved in monitoring if funding were made

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available to do so. However, due to the lack of success at the site, the Agency has been transitioning to end its work there. In our discussions with the Santa Clara Valley Habitat Agency experts, a recommendation was given to review the most recent annual reports on Burrowing Owl monitoring the Habitat Agency has completed and to coordinate with the Habitat Agency's Burrowing Owl Science Team, led by Dr. Lynne Trulio from San Jose State University. This would support learning more about habitat conditions in the recent past at Don Edwards National Wildlife Refuge and patterns of use by Burrowing Owls.

In our opinion, coordinating with the Santa Clara Valley Habitat Agency and affiliated team of scientists and experts should be part of the above-described alternative approach to address the mouse population on the South Farallon Islands. Consider information contained in our comment alone, compared to the less than developed information that is part of the proposed US Fish and Wildlife Service mitigation and monitoring program.

In addition, Peregrine Falcon relocation to the Don Edwards Wildlife Refuge, Warm Springs Unit, could negatively influence the quality of refuge for Snowy Plovers at the refuge.

The California Coastal Commission has the very significant responsibility of "...protecting and enhancing California's coast and ocean for present and future generations..."

Madrone Audubon Society opposes the proposed distribution of the 2nd generation anticoagulant poison, Brodifacoum, over the South Farallon Islands in an attempt to eradicate house mice. We urge the Commission to reject this proposal and recommend a coordinated and well-planned alternative approach with low risk and high potential for efficacy. We recommend documenting such a project via video and film to illustrate leadership in addressing such issues without the possibility of poisoning multiple species and marine sanctuaries.

Sincerely,

Susan Kirks

Susan Kirks, President
Madrone Audubon Society

susankirks@sbcglobal.net, 707-241-5548



National
Wildlife Refuge
Association

April 21, 2021

John Ainsworth
Executive Director
California Coastal Commission
455 Market Street Suite 300
San Francisco, CA 94105

Subject: Consistency Determination for U.S. Fish and Wildlife Service, South Farallon Islands Invasive House Mice Eradication Project, Farallon Islands National Wildlife Refuge

Dear Mr. Ainsworth:

On behalf of the National Wildlife Refuge Association, I am writing in support of the U.S. Fish and Wildlife Service's proposal to eliminate non-native invasive house mice from the South Farallon Islands which are part of the Farallon Islands National Wildlife Refuge. We believe the project is consistent with the California Coastal Management Act and we agree with the California Coastal Commission's own staff report (CD-0002-19, 4/18/19) which supports this conclusion.

The National Wildlife Refuge Association (Association) is a national non-profit wildlife conservation organization focused on the protection and enhancement of the National Wildlife Refuge System, the world's largest system of lands and waters dedicated to wildlife conservation. The Association works closely in local communities with over 200 affiliated refuge Friends organizations who also have a strong interest in proposals affecting the National Wildlife Refuge System and its component wildlife refuges.

Beginning in 1903, the Federal government identified and set aside lands vital for wildlife conservation as part of the National Wildlife Refuge System. The role of the Refuge System is to conserve, manage, and restore wildlife and their habitats on more than 560 wildlife refuges across the nation. These ecologically important, nationally-significant lands include the Farallon Islands National Wildlife Refuge which was established in 1909 specifically to protect "marine birds."

Conservationists have long recognized that control of non-native invasive species is an important part of any conservation effort, and federal funds have regularly been allocated for substantial invasive species control programs nationwide. However, many land-based control efforts require significant ongoing resources due to continual re-invasion from neighboring lands. About 15 years ago, Refuge System leadership took a significant step in prioritizing invasive species control efforts that had a high likelihood of success in eradicating, rather than just controlling, invasive species.

Since islands are particularly vulnerable to invasive species and yet provide a great opportunity for success, a number of island control projects have been successfully undertaken on wildlife

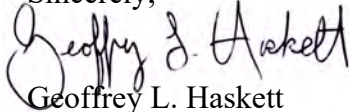
refuges across the country. For example, a 2008 project on the formerly named “Rat Island” within the Alaska Maritime National Wildlife Refuge so successfully eliminated Norway rats on the island that bird populations rebounded and the island’s name could then be changed back its original Aleut name of Hawadax Island. Across the country, at Desecheo National Wildlife Refuge in Puerto Rico, removal of non-native goats, rhesus macaques, and rats resulted in the resurgence of seabird populations as well as a Federally-threatened cactus species.

As with many islands, the flora and fauna of the Farallon Islands evolved without the presence of land-based mammals. Human activities on the Southeast Farallon islands in the 19th and early 20th centuries included the introduction of non-native rabbits, cats and mice. Recent increases in numbers of migratory birds and marine mammals have been largely due to removal of non-native rabbits and cats. But the ecosystem of the South Farallon Islands is still out of balance due to presence of non-native house mice. Mice densities in the fall have been the highest recorded anywhere for this species and their numbers can be easily appreciated when viewed on recorded videos. We support the proposed mouse eradication project since we anticipate an even greater improvement in native wildlife species, especially ash storm petrels, as well as island vegetation following removal of house mice.

We recognize, and do not take lightly, the risks in using rodenticide baits in the natural environment. However, we have reviewed the relevant research on rodent control techniques and find this alternative to be the only proven method shown to totally eradicate rodents from islands. We applaud the Fish and Wildlife Service’s carefully researched and detailed plans for the project, particularly in focusing on a highly monitored, short-term use of the product with substantial mitigation efforts to keep other species from encountering the baits. We believe these plans will minimize any unanticipated impacts on non-target species and the island environment.

Again, we strongly support the South Farallon Islands mouse eradication project and we appreciate the opportunity to provide comments on this consistency determination.

Sincerely,



Geoffrey L. Haskett
President



Margaret T. Kolar
Vice Chair, Board of Directors

cc: Steve Padilla, Chair, Coastal Commission



Letter in support of USFWS Mouse Eradication Plan for Southeast Farallon Island

Dear California Coastal Commission,

We are writing this letter in support of the plan outlined by the US Fish and Wildlife Service (McChesney et al., 2019) to eradicate invasive house mice from Southeast Farallon Island. Our thoughts on this proposed action are summarized below:

- Our deepest gratitude to the California Coastal Commission for its attention to maintaining the quality of our precious coast and its resources. As an organization that provides medical and rehabilitative care to hundreds to thousands of California's seabirds each year, many of whom have been adversely affected by human activities, we appreciate your efforts to maintain the environmental quality of our coast in perpetuity.
- As a science-based organization, we also wish to express our deep respect and gratitude to both the U.S. Fish and Wildlife Service and Point Blue Conservation Science for their effective work to reverse anthropogenic degradation of the wildlife habitats found on the Farallon Islands. These islands host a vibrant ecosystem that offers much needed resting and breeding habitat to seabirds and marine mammals, while supporting endemic amphibians, invertebrates, and plants on land and a rich marine community in the water.
- We acknowledge that anti-coagulant rodenticides are a serious environmental problem on the mainland that cause severe adverse effects in terrestrial carnivores including raptors, mammalian carnivores, and other non-target animals that may eat poison bait or ingest poisoned rodents. Our colleagues in wildlife rehabilitation who treat these poisoned animals are understandably concerned about rodenticides being used in the environment. These poisons cause pain, suffering, and death in wild animals on the mainland, and stress and moral pain in their caregivers. However, the use of a second-generation anti-coagulant rodenticide in an island setting like the Farallon Islands is fundamentally different from chronic mainland usage. It is a one-time application for conservation purposes that is unlikely to contribute to toxicities observed on the mainland. Successful eradication of the rodents will remove the suffering and other detrimental effects their presence inflicts on the other species, much like when we apply a medication (i.e., poison) to a wild animal to remove lice, fleas, parasitic worms, or ticks. Like an island ecosystem, individual wild animals can sometimes continue to survive with heavy infestations, but removing them improves the ability to heal injury by removing energetic drains on metabolic resources.
- As an organization that treats literally hundreds of Western Gulls from the mainland each year in both northern and southern California, we have not seen problems with anticoagulants in this species, despite their living in areas where rodenticides have been in use for decades. Although it is possible that affected birds die prior to us receiving them,



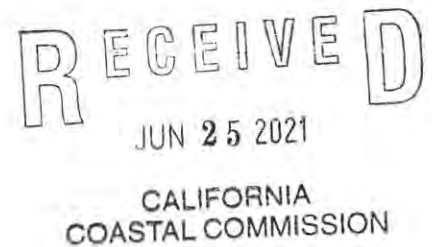
numerous Western Gull patients are rescued from urban areas where they might be expected to eat poisoned rodents or exposed bait (e.g. downtown San Francisco or Los Angeles). Although our patients have not been tested for anticoagulant residues, and as such, low levels of contamination may be undetected, we cannot recall or find in our database any suggestion of a Western Gull with evidence of a coagulopathy.

Our respect for the expertise of the organizations that study and manage the Farallon Islands prompts us to find the eradication plan acceptable, if its proposed mitigations against potential adverse impacts to non-target animal are applied. We know the biologists and ecologists undertaking this work have not only an intimate understanding of the specific problems occurring at Southwest Farallon Island and the scientific expertise to have objectively assessed all potential solutions, but they also bring a tremendous love and care for these islands that many have made their life's work. We trust them to make the best possible decisions for this beloved and delicate ecosystem. If it should become necessary, we stand ready to provide treatment for any Western Gulls or other birds that may be inadvertently affected.

Respectfully submitted,

International Bird Rescue

Mary McAllister
4217 Gilbert St
Oakland, CA 94611



21 June 2021

Cassidy Teufel
Senior Environmental Scientist
Energy, Ocean Resources & Federal Consistency Division
California Coastal Commission
455 Market St, Suite 300
San Francisco, CA 94105

RE: USFWS 2021 Draft Bait Spill Contingency Plan,
Draft Non-Target Species Contingency Plan
Draft Mitigation and Monitoring Plan

Dear Mr. Teufel:

I am submitting these comments for inclusion in the Commission's Staff Recommendation Packet for the proposed USFWS Farallones Mice Eradication Project.

I am opposed to the plans to aerial bomb rodenticides on the Farallon Islands to eradicate mice for several reasons:

- The project admits that hundreds of non-target birds will be killed by the rodenticide, either directly or by eating poisoned mice. In September 2020, California banned the use of the rodenticide that will be used by this project because of the deadly impact on non-target wildlife, yet an exemption was created that will enable its use by this project. The promoters of this project cannot deny that hundreds, if not thousands of non-target animals will be killed by this project. That outcome is now confirmed by California State Law.
- The mice are not eating birds or chicks, the claimed beneficiaries of this project. Rather a small population of burrowing owls is blamed for eating birds and chicks of other bird species.
- This project plan has not considered the most obvious alternative to eradicating mice that are not killing birds. The alternative that will not kill any animals or birds that was not considered is removing the small population of resident burrowing owls from the Farallon Islands. This alternative was successfully used by the National Park Service to remove Golden Eagles from the Channel Islands to save the endangered Channel Island Fox. Details on that project are provided below.
- The food web on the Farallon Islands has not been adequately studied. The project plan reports that the mice are a source of food for burrowing owls. However, the project plan has not identified all of the predators of the mice. Therefore, the project has not evaluated the extent to which the entire food web would be disrupted by the elimination of a major source of prey for birds of prey. All predators of the mice are at risk of eating the poisoned mice and/or being killed by the poison. Details on that issue are provided below.

These are the inadequacies of the DEIS for this project:

Resident Burrowing Owls should be removed from Farallon Islands

The DEIS for this project should have considered the alternative of removing the small population of resident burrowing owls from the Farallon Islands. In fact, the DEIS claims that removal of the mice was considered and rejected as an alternative, but not the removal of the owls. The owls are the predators of the ash storm petrel, not the mice. Therefore, the owls are the obvious target for removal. Given their small number relative to the large population of mice, their removal would be considerably easier.

This strategy was successfully used by the National Park Service to save the endangered Channel Island Fox on the Channel Islands. Golden Eagles were not considered “native” to the Channel Islands. They arrived in the 1990s because of the feral pigs and goats that had been introduced to the islands. When NPS took over management of the islands, they removed the feral pigs and goats, but not the Golden Eagles. Deprived of the food the eagles came for, the eagles turned to preying on the Channel Island Fox, nearly driving it to extinction. From 1999 to 2006, the eagles were trapped and moved off the island: *“In order to mitigate golden eagle predation on island foxes, The Santa Cruz Predatory Bird Research Group, with the support of the Park Service and The Nature Conservancy, relocated golden eagles to distant sites on the California mainland. A total of 44 golden eagles, including 10 eaglets born on the islands, were trapped and relocated, and monitoring indicates that none have returned.”*¹ NPS considers the removal of eagles the primary factor in saving the Channel Island Fox from extinction. The 44 birds that were removed were more than 4 times more numerous than the 8-10 burrowing owls on the Farallon Islands. They are enormous carnivorous birds, compared to the pint-sized, ground-dwelling burrowing owls.

Please note that the threat to the fox posed by Golden Eagles was created by the removal of the prey of the Golden Eagles without adequate analysis and understanding of the food web. NPS should have predicted that the loss of the preferred prey of Golden Eagles would disrupt the food web in ways that could have been predicted. Now other “experts” are poised to make a similar mistake at the expense of thousands of rare birds and marine mammals on the Farallons.

The Madrone Chapter of Audubon Society in Santa Rosa opposes this project and agrees that relocation of burrowing owls is “feasible and could be planned and carried out.”²

Disrupting the Food Web

The DEIS has not adequately analyzed the food web on the Farallon Islands and has therefore not identified the environmental impact of eradicating an important source of food for the animals that live on the island.

According to the DEIS, there are many birds of prey on the Farallon Islands, most migrating, but some resident: falcons, hawks, kites, eagles, owls, and kestrels. Most of the migrating raptors are on the island in the fall, when the mouse population is at its peak. The DEIS acknowledges that the raptors probably eat mice on the island, but dismisses that as a significant issue. However, it would be a significant factor in evaluating environmental impact if migrating raptors compensate for the loss of mice as their prey by preying on birds or salamanders. The DEIS does not address the important question of what birds of prey will eat if mice are eradicated. More likely, many birds of prey will be killed by eating poisoned dead or dying mice.

A similar mistake was made by a rat eradication project on the Palmyra atoll. The first attempt to eradicate the rats in 2002 failed, partly because Palmyra’s abundant land crabs outcompeted the rodents for the poisonous bait. The crabs’ physiology allowed them to eat the poison—the anticoagulant brodifacoum—without ill effect. The reason why this attempt failed was that the “experts” who designed this poison drop did not realize that the rats lived in the coconut palms and didn’t spend much time on the ground. In other words, the poison wasn’t dropped where the rats lived. The second drop was delivered to the crowns of the palms: “The crowns became a convenient platform for stashing cotton gauze sacks of poison bait, delivered by workers firing slingshots or dangling from helicopters.” This project is now focused on eradicating 30,000 adult palms and over 2 million juvenile palms from Palmyra using herbicide. These island eradications have repeatedly demonstrated that they are not successful and they ultimately put land managers on a

¹ <https://www.nps.gov/chis/learn/nature/golden-eagle.htm#:~:text=From%201999%20through%202006%2C%20golden,bred%20on%20the%20Channel%20Islands.>

² https://www.madroneaudubon.org/pdf/newsletter/Leaves_Dec20-Jan21.pdf

perpetual pesticide treadmill. The result is a poisoned environment that is dangerous to every living plant and animal on the island.³

Ironically, the explosion of the mouse population on the Farallons was the unintended consequence of inadequate understanding of the food web: “House mice and other animals such as cats and rabbits were introduced to the island when ships landed there in the 19th century. While the cats and rabbits have been removed, the mice population has exploded to an estimated 60,000, or about 500 mice per acre.”⁴ One of the primary predators of the mice was removed, which resulted in increased population of their prey, the mice. Now USFWS proposes to eradicate the prey, which will have unintended consequences, such as the death of the predators who will eat the poisoned mice, or the predators of the mice eating bird eggs and chicks instead, or predators not having adequate food, or all of the above. As Einstein famously said, “We cannot solve our problems with the same thinking we used when we created them.” Killing seems to be the only tool in the toolbox of USFWS. One eradication attempt seems to lead to another unless we have the wisdom to step off this deadly treadmill.

Rodenticides are known killers of birds of prey

This article⁵ published by Beyond Pesticides explains how birds of prey are killed by rodenticides: “While a rodent is likely to die from this poison, ingesting it also turns it into a sort of poison Trojan horse for any predator that may take advantage of its slow decline. An eagle that eats a poisoned rodent at the edge of death will be the next to succumb to the anticoagulant effects ‘Humans need to understand that when those compounds get into the environment, they cause horrible damage to many species, including our national symbol, the bald eagle,’” said the scientist who conducted a study of eagle deaths that found: “The vast majority of bald and golden eagles in the United States are contaminated with toxic anticoagulant rodenticides, according to research published earlier this month.”

Temporary Results

One of many reasons the mouse eradication project on the Farallon Islands is controversial is that similar projects all over the world are not successful. Some are not successful in the short run⁶ and are immediately done again. Some are not successful in the long run.

Rodenticides were aerial bombed on the Lord Howe Islands in Australia in 2019 at a cost of \$16 million. Two years later, two rats (one male and one pregnant female) have been found. Genetic tests will determine if they arrived from elsewhere or are descendants of the original population. An article in *The Guardian*⁷ explains the elaborate effort on Lord Howe to find new rats and exterminate them. This strategy might work on an inhabited island, such as Lord Howe, but it is not an effective strategy on the Farallons because it is not inhabited, it has only occasional visitors, and its steep, rocky terrain is not easily monitored. New mice or rats could go undetected on the Farallons before anyone would know it. New rats or mice are more likely to reach the Farallons—only 27 miles from San Francisco—than Lord Howe Islands that are 320 miles east of mainland Australia.

³ <https://www.sciencemag.org/news/2020/08/save-palm-filled-paradise-biologists-must-kill-trees>

⁴ <https://www.marini.com/2021/04/21/biden-administration-revives-farallon-islands-poison-plan/>

⁵ <https://beyondpesticides.org/dailynewsblog/2021/04/study-finds-eagle-populations-experiencing-widespread-rodenticide-exposure/>

⁶ <https://scholarspace.manoa.hawaii.edu/handle/10125/50807>

⁷ <https://www.theguardian.com/australia-news/2021/apr/19/rats-reappear-on-lord-howe-island-for-the-first-time-since-2019-eradication-program?fbclid=IwAR0Cb4gbBVczRz5ycKX4ggoXK2jITk-Q4z2fJEmJJIH1UYf1i0Z4pgmbxYg>

This is an example of one of the fundamental truths of the "restoration" industry: The work is NEVER done. It must be done repeatedly. The cost is daunting, the collateral damage to non-target animals often unacceptable, the results only temporary. The cost-benefit ratio is very unfavorable.

Ethical considerations

For the record, I would like to clearly state my objection to the Farallons project. I consider it unethical to kill one species of animal based on a presumed benefit to another animal species. In this case, the chosen scapegoat is considered a non-native animal that has lived on the Farallon Islands for over 100 years and is therefore fully integrated into the food web.

Nativism has a death grip on our public lands. Hundreds of non-target animals will be killed by this project because of the toxicity of the rodenticide and the random manner in which it will be applied on the island. The project will clearly do a great deal of harm to all life on the Farallons and its benefits are obscure at best. Please do not endorse this pointless, deadly project.

Sincerely,

A handwritten signature in cursive script that reads "Mary McAllister".

Mary McAllister

Website: <http://conservsense.org>

marymcallister@comcast.net

510-547-2563

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

Form Letter Emails

This item is a form letter sent to the Farallon Islands Consistency inbox from **7,278** separate contacts:

Farallon Islands: Use Contraceptive Bait instead of Poison

Dear California Coastal Commission California Coastal Commission,

As someone who is concerned with wildlife, and one of over 250,000 In Defense of Animals supporters, I am writing to urge you to reject the U.S. Fish and Wildlife Service's (USFWS) poison dispersal plan for the Southeast Farallon Island, and to explore non-toxic contraceptive bait as a solution instead.

The Environmental Impact Statement from the USFWS supports Alternative B, which will involve dumping nearly 3,000 pounds of the anticoagulant rodenticide Brodifacoum-25D Conservation on the South Farallon Islands to eradicate the population of house mice.

This proposal is intended to benefit several species, including the ash storm petrel, and the ecosystem. However, it should not be supported.

I appreciate that the ash storm petrel is a threatened species, and I wish to protect these birds. I also appreciate that the house mouse is non-native to the Farallon Islands, and seems to be disrupting the local ecosystem by attracting burrowing owls, who prey on the ash storm petrel during its breeding season.

However, the proposal to drop super-toxic rodenticide poison on the island is incredibly cruel and poses significant risks to other wild animals and the environment.

For starters, it is bad to mass poison sentient creatures. Poisoning is an incredibly painful way to die. The death can take days, as the body slowly succumbs to dehydration and internal bleeding.

Also, air-dropping rodenticide is hardly a targeted solution. The proposed poison is toxic not only to mice, but also to birds, mammals, and aquatic life. Non-target animals will consume this poison either directly, or by consuming prey animals who consumed it, and significant nontarget deaths are expected. These deaths will likely number in the thousands or tens of thousands across species. The USFWS anticipates 1,000 gull deaths alone.

The dangers associated with second-generation anticoagulant rodenticides, including brodifacoum, are widely-acknowledged by scientists, conservationists and politicians which led to a ban on nearly all uses in the state of California as of January 1, 2021. It is reckless to dump these poisons in full knowledge of the harms they cause throughout the ecosystem.

It is even worse that this is planned to take place just off the coast of San Francisco, the city named for St. Francis of Assisi, the patron saint of animals.

Most importantly, there is a better solution, and no need to put thousands of sentient creatures through an agonizing death, including potentially some of the birds you are looking to protect, when non-toxic contraceptive bait is already available.

Please, reject the USFWS poison dispersal plan for the Southeast Farallon Island, and explore non-toxic contraceptive bait as a solution instead.

Support for Farallon Islands Mouse Eradication Plan

Dear Commissioners,

I am writing to request that you concur with your own staff's recommendation and approve the upcoming request for a consistency determination for the US Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands. I have read extensively as an amateur bird watcher about the problems of island ecosystems and concur with the experts that mice removal is essential for the survival of bird species that live on the islands.

The introduction of invasive, non-native house mice to the Farallon Islands has caused significant disturbance to the islands' sensitive ecosystem. The house mice have direct and indirect harmful impacts on the islands' breeding seabirds, especially ash-storm-petrels, but also on Leach's storm-petrels, as well as on native salamanders, crickets and other invertebrates, and native plants.

The only way to allow the ecosystem to recover is to ensure 100% eradication of the house mice. The survival of even a single pair of mice jeopardizes the whole project, as the mouse population can recover incredibly quickly.

At present, there is only one known method that has proven effective for island eradications, and that is the "preferred alternative" (an aerial broadcast of the rodenticide Brodifacoum) identified by the US Fish and Wildlife Service in the Final Environmental Impact Statement published in March 2019.

Thank you for your consideration and for following the best available science when making your decision.

This item is a form letter sent to the Farallon Islands Consistency inbox from **77** separate contacts:

Farallon Islands: Use Contraceptive Bait Instead of Poison

Dear California Coastal Commission California Coastal Commission,

As a veterinarian who is concerned with wildlife, and one of over 250,000 In Defense of Animals supporters, I am writing to urge you to reject the U.S. Fish and Wildlife Service's (USFWS) poison dispersal plan for the Southeast Farallon Island, and to explore non-toxic contraceptive bait as a solution instead.

The Environmental Impact Statement from the USFWS supports Alternative B, which will involve dumping nearly 3,000 pounds of the anticoagulant rodenticide Brodifacoum-25D Conservation on the South Farallon Islands to eradicate the population of house mice.

This proposal is intended to benefit several species, including the ash storm petrel, and the ecosystem. However, it should not be supported.

I appreciate that the ash storm petrel is a threatened species, and I wish to protect these birds. I also appreciate that the house mouse is non-native to the Farallon Islands, and seems to be disrupting the local ecosystem by attracting burrowing owls, who prey on the ash storm petrel during its breeding season.

However, the proposal to drop super-toxic rodenticide poison on the island is incredibly cruel and poses significant risks to other wild animals and the environment.

For starters, it is bad to mass poison sentient creatures. Poisoning is an incredibly painful way to die. The death can take days, as the body slowly succumbs to dehydration and internal bleeding.

Also, air-dropping rodenticide is hardly a targeted solution. The proposed poison is toxic not only to mice, but also to birds, mammals, and aquatic life. Non-target animals will consume this poison either directly, or by consuming prey animals who consumed it, and significant nontarget deaths are expected. These deaths will likely number in the thousands or tens of thousands across species. The USFWS anticipates 1,000 gull deaths alone.

The dangers associated with second-generation anticoagulant rodenticides, including brodifacoum, are widely-acknowledged by scientists, conservationists and politicians which led to a ban on nearly all uses in the state of California as of January 1, 2021. It is reckless to dump these poisons in full knowledge of the harms they cause throughout the ecosystem.

It is even worse that this is planned to take place just off the coast of San Francisco, the city named for St. Francis of Assisi, the patron saint of animals.

Most importantly, there is a better solution, and no need to put thousands of sentient creatures through an agonizing death, including potentially some of the birds you are looking to protect, when non-toxic contraceptive bait is already available.

Please, reject the USFWS poison dispersal plan for the Southeast Farallon Island, and explore non-toxic contraceptive bait as a solution instead.

Opposing Poison on Farallon Islands

To California Coastal Commissioners:

I'm writing to urge you in the strongest possible terms to do all you can to prevent the proposed "poison drop" on the Farallon Islands, for the following reasons:

- The California Coastal Commission should not condone the use of deadly anticoagulant poisons on the Farallon islands, which are designated a National Marine Sanctuary and a National Wildlife Refuge.
- The proposed rodenticide was outlawed in the State of California by the state legislature and Governor Newsom in 2020.
- No matter which rodenticide is proposed, there is an obvious and unacceptable danger that the poison will end up in the water, in the bodies of birds who are leaving the islands and impact non-target animals.
- The suggestion by USFWS that hazing will be sufficient to prevent the poison from entering the food chain is without merit. Obviously, birds will eat animals that are dying from being poisoned.
- Studies have shown that in a significant number of instances (38%), the use of this rodenticide to eradicate mice has failed.
- There is no 'safe' level of usage of these second-generation anticoagulants and we hope you will carefully consider the unintended consequences before supporting any use of these poisons on the Farallon Islands. As a California resident and taxpayer, I expect the California Coastal Commission to protect our beautiful coast, not condone the use of deadly environmental poisons

For these reasons, I strongly urge you to deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project.

Thank you for your consideration and your leadership.

A total of **51** emails were received from various individuals that contained nothing in the body of the emails but rather expressed support or opposition in the subject lines. The following subjects were received:

Opposition:

I oppose the drop of poison on Farallon islands
Please cancel the use of any environmental poisons on the Farallon islands
NO POISON DROP!!!
No poison drop PLEASE
Stop the Drop
NO Pesticide Drop
no toxics at Farallons
Please no poison drop
Poison Drop
Please authorize an alternative plan for Aerial Poison-Drop
I am very much against the cereal drop
Desist! No rodenticide on Farallon Islands
DO NOT POISON THE ISLANDS!!!
Do not dump poison onto the farallons
DO NOT USE RAT POISON ON THE FARALLON ISLANDS
NO TO POISON!
Don't use poisons on the Farallons

Support:

Please support the mice removal plan for the Farallon Islands
Support for Farallon Islands Mouse Eradication Plan

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

Individual Emails

From: [Carol H](#)
To: Energy@Coastal
Subject: against the proposal re Farallon Island mouse problem
Date: Wednesday, November 24, 2021 7:33:49 PM

I submit this with no other words necessary.....

- **In 2020, legislation was passed and signed by Governor Newsom, outlawing the use of this very same poison (the anticoagulant rodenticide, brodifacoum) in California.** This is because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats and other predatory animals tested by WildCare (in Marin County) have this poison in their blood. Other studies across the country have shown similar impacts on Bald Eagles and Red-Tailed Hawks.

Carol Houck resident of Marin county for over 65 years. 415-717-3392

From: [Patricia Peck](#)
To: [Energy@Coastal](#)
Subject: ALL ANIMALS LIVES MATTER
Date: Wednesday, November 24, 2021 1:48:37 PM

I DEMAND ALL ANIMALS DESERVE TO LIVE SAFE AND FREE FROM HUMAN INTERFERENCE AND SELFISHNESS IN THEIR NATURAL HABITATS!
I DEMAND ALL LAWS PROTECT ALL ANIMALS LIVES AND THEIR HABITATS AUTOMATICALLY WITHOUT THE NEED FOR A PETITION!

[Sent from Yahoo Mail for iPhone](#)

From: [Pam Sheeler](#)
To: Energy@Coastal
Subject: CA Coastal Comm should not condone use of deadly environmental poisons on the Farallon Islands
Date: Wednesday, November 24, 2021 1:55:00 PM

Hello,

- The Farallon Islands, just off our coast, are wild and starkly beautiful. They are deserving of the many layers of protection afforded them over the years, including designating them a National Marine Sanctuary and a National Wildlife Refuge. **The California Coastal Commission should not condone the use of deadly environmental poisons on these islands.**
- **In 2020, legislation was passed and signed by Governor Newsom, outlawing the use of this very same poison (the anticoagulant rodenticide, brodifacoum) in California.** This is because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats and other predatory animals tested by WildCare (in Marin County) have this poison in their blood. Other studies across the country have shown similar impacts on Bald Eagles and Red-Tailed Hawks.
- **It is impossible for anyone to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone,** only affecting the rodents it is intended to kill. Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or debilitating both the nontarget animals that consume the poison, and the animals that consume those that have eaten the poison.
- **Hazing will not work.** There will be Western Gulls that get sick and die from the use of rat poison on the island. Studies show that the gull population is not constrained to the Islands, and in fact the birds circulate widely. **Given how far gulls travel to and throughout the**

mainland, how could anyone stop the poison from entering the food chain in regions around the Bay?

- The USFWS assertions that the poison will not leave the island are based on hazing trials conducted when there were not edible cereal pellets of poisoned bait OR dead and dying mice strewn across the island. Deterring hungry gulls from a readily-available food source is virtually impossible, especially long-term.
- This proposal to drop anticoagulant rodenticides on the Farallon Islands has been circulating for more than 10 years. **If, over the course of those ten years a comprehensive IPM rodent reduction and removal strategy had been implemented**, the Southeast Farallon Island would have significantly fewer mice.
 - Relocation of the 6 - 10 Burrowing Owls that threaten endangered seabirds, and implementation of a comprehensive, nontoxic IPM strategy should be the choice, not poison.
- Worldwide, **thirty-eight-percent (38%) of the initial aerial applications of this same Brodifacoum rodenticide bait during eradication efforts to control mice on islands have failed to fully eliminate the mice**. A follow-up repetition of recurring poison applications is often tried during the following years. This approach leads to the worst possible outcome – repeated poisoning of the ecosystem while failing to achieve the goal. Poison is not the answer.
- **There is no ‘safe’ level of usage of these second-generation anticoagulants** and we hope you will carefully consider the unintended consequences before supporting any use of these poisons on the Farallon Islands. The California Coastal Commission should protect our beautiful coast, not condone the use of deadly

environmental poisons.

Thank you for your consideration and your leadership,
Pam Sheeler

From: [Mark Setterberg](#)
To: Energy@Coastal
Subject: California Offshore Islands
Date: Wednesday, November 24, 2021 4:55:03 PM

Dear Sir,

I am writing to oppose the use of mouse/rat poisons on California Offshore islands. These poisons are now illegal in the state of California. They should not be used in offshore islands as well. Thank you.

Mark Setterberg

From: [Amy Allen](#)
To: Energy@Coastal
Subject: Coagulopathy rat poisons
Date: Wednesday, November 24, 2021 7:10:33 PM

Hello,

I hope you are consulting veterinarians about your proposed dropping of rodenticides at the Farallon Islands.

We know that these poisons are both an awful way to die and are definitely lethal to any animal eating the dead or dying animal.

Owls feeding these poisoned mice to their families can kill the entire owl family. Generally it is believed that an owl family can catch and kill far more mice than a rodenticide can do. Of course, one is not usually poisoning an entire island...

There is no way to prevent unintended deaths of other animals on and off the island when using a rodenticide like Brodifacoum.

I am sure you can figure out birth control, owls or other predators, or some safer way for decreasing the population of mice.

Amy Allen

Amy Allen, DVM, Diplomate ACVIM
Mobile Endoscopy
415-272-8982

From: [Arlene Steinberg](#)
To: Energy@Coastal
Subject: Comment on Farallon Islands Poison Drop
Date: Wednesday, November 24, 2021 3:34:48 PM

Dear California Coastal Commission,

I wish to submit my following comments for the December hearing on this poison drop. In view of the potentially catastrophic environmental consequences, I am totally opposed to this proposal.

The Farallon Islands frankly should be designated a National Marine Sanctuary and a National Wildlife Refuge, to give these wild and magnificent islands the protection they deserve.

Under no condition should the California Coastal Commission condone the use of deadly environmental poisons on these islands.

Governor Newsom signed legislation outlawing the use of this very same poison (the anticoagulant rodenticide, brodifacoum) in California in 2020. This is because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats and other predatory animals tested by WildCare (in Marin County) have this poison in their blood. Other studies across the country have shown similar impacts on Bald Eagles and Red-Tailed Hawks.

There is literally no possible way for anyone or any agency to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone, only affecting the rodents it is intended to kill. Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or

debilitating both the nontarget animals that consume the poison, and the animals that consume those that have eaten the poison. Consider, for example, the Western Gulls: studies show that the gull population is not constrained to the Islands, and in fact the birds circulate widely. Given how far gulls travel to and throughout the mainland, it would be impossible to prevent the poison from entering the food chain in regions around the Bay. Those gulls will be sickened and die from the use of rat poison on the island.

Hazing will not work. The USFWS assertions that the poison will not leave the island are based on hazing trials conducted when there were not edible cereal pellets of poisoned bait OR dead and dying mice strewn across the island. Deterring hungry gulls from a readily-available food source is virtually impossible, especially long-term.

This proposal to drop anticoagulant rodenticides on the Farallon Islands has been circulating for more than 10 years. **If, over the course of those ten years a comprehensive IPM rodent reduction and removal strategy had been implemented, the Southeast Farallon Island would have significantly fewer mice.**

Relocation of the Burrowing Owls that threaten endangered seabirds, and implementation of a comprehensive, nontoxic IPM strategy should be the choice, not poison. The House Mice are not the main threat to the nesting seabirds on the island. Since WildCare began opposing the poison drop plan in 2011, there has been little or no evidence that the mice themselves directly threaten the seabirds nesting on the island. Instead, a small population of 6 - 10 Burrowing Owls begin to prey on seabird nestlings once

the mouse population decreases in its seasonal fluctuation and they should be safely relocated.

Worldwide, thirty-eight-percent (38%) of the initial aerial applications of this same Brodifacoum rodenticide bait during eradication efforts to control mice on islands have failed to fully eliminate the mice. Since it is not uncommon for an initial Brodifacoum drop to fail to fully eradicate mice, a follow-up repetition of recurring poison applications is often tried during the following years. Mice, in particular, tend to quickly develop a genetic resistance to such rodenticides, further complicating the escalating biological risks for harmless non-target species in the path of what then becomes an inevitable series of repeated multi-year poison drops.

Unforeseen harm and damage to ecosystems on other islands around the globe resulting from spreading this same poison is well-documented. Not surprisingly, follow-up analytical studies found that brodifacoum was still present in fish within the drop zone three years after the 2012 helicopter distribution of this same chemical on Wake Island in the middle of the Pacific Ocean. The U.S. Air Force, following the brodifacoum application there that failed to kill all of the targeted rats, recommended a restriction on human consumption of fish for 942 days.

It should be abundantly clear after other usage documentation that there is no 'safe' level of usage of these dangerous second-generation anticoagulants. I urge you to carefully consider the unintended consequences before supporting any use of these poisons on the Farallon Islands and I hope that you will have the good leadership and

wisdom to deny the South Farallon Islands Invasive House Mouse Eradication Project. The California Coastal Commission needs to protect our beautiful coast, not condone the use of deadly uncontrollable environmental poisons. There are other better programs that should be implemented instead of this plan.

Thank you for your consideration of my comments.

Respectfully,

Arlene Steinberg, Philadelphia, PA resident and consistent visitor to California nature areas including the Farrallon Islands

From: [Yahoo!](#)
To: Energy@Coastal
Subject: Deny "South Farallon Islands Invasive House Mouse Eradication Project" !
Date: Wednesday, November 24, 2021 4:18:19 PM

Our Family, Strongly, Objects To The, Proposed, Farallon Islands Poison Drop! You have not weighed the, long-term, impacts!

The "California Coastal Commission" has released the agenda for their December meeting, taking place on Thursday, December 16, which includes the consistency determination by the "U.S. Fish and Wildlife Service" for the "South Farallon Islands Invasive House Mouse Eradication Project." We are speaking out against the proposed poison drop!

This project is a, totally, unnecessary, and, environmentally, catastrophic, proposal! Poison is not the answer! We are requesting your practical, thorough, objective, and, honest assessment of the repercussions of this, deadly, proposal!

- There is no 'safe' level, of usage, of these, second-generation, anticoagulants, and, we trust that you will, carefully, consider the, unintended, consequences before supporting any use of these poisons on the Farallon Islands! The "California Coastal Commission" **MUST** protect our beautiful, coast, not, condone the use of, deadly, environmental poisons!
- Relocation of the 6 - 10 Burrowing Owls who threaten, endangered, seabirds, and, implementation of a comprehensive, nontoxic, "IPM" strategy **MUST** be the choice, not, poison!
 - The Farallon Islands are wild, and, starkly, beautiful. They are deserving of the many, layers of protection afforded them, over the years, including designating them a "National Marine Sanctuary", and, a "National Wildlife Refuge". The "California Coastal Commission" should **NOT** condone the use of, deadly, environmental poisons on these islands!
 - In 2020, legislation was passed, and, signed, by Governor Newsom, outlawing the use of this, very, same poison (the anticoagulant rodenticide, brodifacoum) in California! This is because of the documented impact on predators up the food chain! 76% of raptors, foxes, bobcats, and, other, predatory animals, tested by "WildCare", (in Marin County) have this poison in their blood! Other studies, across the country, have shown, similar, impacts on Bald Eagles, and Red-Tailed Hawks!
- It is impossible for anyone to ensure that the, massive, load of poison

proposed to be strewn, across the South Farallon Island, will remain on the island, alone, only, affecting the rodents it is intended to kill! Poison will end up, in the water, and, kill marine life. It will, also, be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing, or, debilitating, both the, nontarget, animals who consume the poison, and, the animals who consume those that have eaten the poison!

- Hazing will not work. There will be Western Gulls who get sick, and, die, from the use of rat poison on the island! Studies show that the gull population is NOT constrained to the "Islands", and, in fact, the birds circulate, widely. Given how far gulls travel to, and, throughout, the mainland, how could anyone stop the poison from entering the food chain in regions around the Bay?
 - The "USFWS" assertions that the poison will not leave the island, are based on, hazing, trials conducted when there were NOT edible cereal pellets of, poisoned, bait, OR, dead, and, dying, mice, strewn across the island. Deterring, hungry, gulls from a, readily-available, food source is, virtually, impossible, especially, long-term!
 - This proposal to drop, anticoagulant, rodenticides, on the Farallon Islands, has been circulating for more than 10 years! If, over the course, of those ten years, a, comprehensive, "IPM" rodent reduction, and, removal, strategy had been implemented, the Southeast Farallon Island would have, significantly, fewer mice!
 -
 - Worldwide, thirty-eight-percent (38%) of the, initial, aerial applications of this, same, "Brodifacoum" rodenticide bait, during, eradication, efforts to control mice, on islands, have failed to, fully, eliminate the mice! A, follow-up, repetition of, recurring, poison applications is, often, tried during the, following, years. This approach leads to the, worst possible, outcome – repeated poisoning of the ecosystem, while failing to achieve the goal!

Sincerely,

DIANE M. KASTEL AND FAMILY
VENICE BEACH, CA

From: [Rick Schulte](#)
To: Energy@Coastal
Subject: Don't drop poison on Farallon Island
Date: Wednesday, November 24, 2021 4:24:41 PM

This will result in the death of many other species who might feed off the mice. Have some “working” cats dropped off there and later recovered. Much more humane. Rick

Sent from my iPad

From: [Dianne Lambert](#)
To: Energy@Coastal
Cc: [Dianne Lambert](#)
Subject: Dropping Poison On An Island
Date: Wednesday, November 24, 2021 4:25:59 PM

There HAS to be a smarter way to control rodents/mice! Birds of prey, neutered cats? Come on people, use your heads, poison is not the smartest way to eliminate the problem! You are surely able to protect the environment using a better method!

I believe that you can do the right thing for the environment if you will think outside the box.

Thank you,

Dianne Lambert
Wichita, Kansas

From: [robert raven](#)
To: Energy@Coastal
Subject: Farallon Is. Mice
Date: Wednesday, November 24, 2021 11:53:24 PM

Please don't poison the wildlife and sealife preserve. Poisoned mice will be eaten. Use non-toxic trapping and other non-toxic alternatives, if possible.

From: [Gigi Shea](#)
To: Energy@Coastal
Subject: Farallon Island Poison Drop
Date: Wednesday, November 24, 2021 4:22:10 PM

The California Coastal Commission should not condone the use of deadly environmental poisons on these islands. Past experiences have shown that this method does not work.

This is a tremendous danger to all of the other sea creatures, birds and raptors and mammals that live on or around the islands.

If, over the course of those ten years a comprehensive IPM rodent reduction and removal strategy had been implemented, the Southeast Farallon Island would have significantly fewer mice.

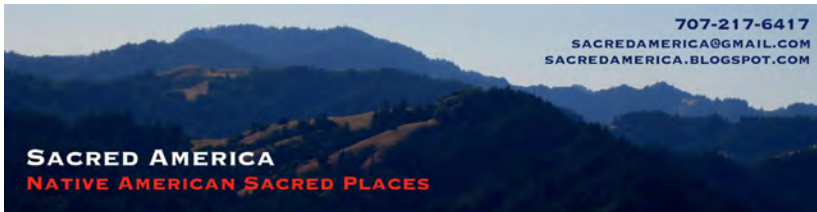
- Relocation of the 6 - 10 Burrowing Owls that threaten endangered seabirds, and implementation of a comprehensive, nontoxic IPM strategy should be the choice, not poison.
- Worldwide, thirty-eight-percent (38%) of the initial aerial applications of this same Brodifacoum rodenticide bait during eradication efforts to control mice on islands have failed to fully eliminate the mice. A follow-up repetition of recurring poison applications is often tried during the following years. This approach leads to the worst possible outcome – repeated poisoning of the ecosystem while failing to achieve the goal. Poison is not the answer.
- There is no 'safe' level of usage of these second-generation anticoagulants and we hope you will carefully consider the unintended consequences before supporting any use of these poisons on the Farallon Islands. The California Coastal Commission should protect our beautiful coast, not condone the use of deadly environmental poisons.

For these reasons, I strongly urge you to deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project.

Thank you for your consideration and your leadership.

Jackie Shea

From: [Luan Marks](#)
To: Energy@Coastal
Subject: Farallon Islands Poison Drop Comments
Date: Wednesday, November 24, 2021 3:46:25 PM
Attachments: [image.png](#)
[Megalithic Artifacts.pdf](#)
[Spirit Path and Sacred Places.pdf](#)



To: California Coastal Commission Members
Re: Comments on the Proposed Farallon Islands Poison Drop
Date: November 24, 2021

My updated research on the mortuary complexes of which the Farallon Islands are an integral part is attached. It includes documentation of the importance and sacredness of the Farallon Islands to both the Ohlone and Coast Miwok tribes, to inform the Commission's decision on the proposed rodenticide drop there.

I am also attaching a paper by my research partner, Stephen D. Janes, Ph.D., a geologist/archaeologist also studying the sites, including the Farallones.

We both oppose the proposed poison drop on the Farallones for multiple reasons, and these papers support our positions.

A primary reason—these mortuary complexes are ancient traditional cultural places and sacred to Indigenous peoples. I have found comparable complexes with similar details among the Chumash Indians in California, the Klamath Basin Indians, the Blackfoot/Blackfeet in Montana and Canada, and places elsewhere in North America. They are a culturally important phenomenon.

There is well-established evidence of the presence of human habitation in North and South America before 11,200 years ago. Paulette Steeves listed 111 archaeological sites in North America that are older than 11,200 years and 58 in South America.¹

The 4th and 5th oldest sites on Dr. Steeves' North American list are the Cerutti site and Calico sites in Southern California, with evidence of human activity, that date back to minimally 130,700 years and 200,000 +/- 20,000 years respectively (200). There was extensive research to establish those dates. It is likely that more northern locations along the coast were also suitable for habitation during this extended time period. The complex at Point Reyes may be a part of those early habitation patterns in California.

The Pacific Ocean level rose and flooded the Continental Shelf, where the Farallones are situated, between 18,000 to 6,000 years ago.² Even a conservative research estimate admits that Indigenous humans could have been in North America, along the Pacific Coast, at least 20,000 years ago,³ well before the ocean level rose. That means that during that period of time, large areas of the Continental Shelf were above water, the Farallones were more accessible, and coastal habitation was probable there, as coastal peoples stay close to ocean food sources. Evidence of habitation thus may still exist and be found there.

It is entirely plausible that the Point Reyes/Farallon Islands complex stands among the most ancient traditional cultural places in North America that have been identified to date, and that megalithic remains could continue to be found at the Farallones and on the Continental Shelf.

I am not aware that there was tribal consultation related to the proposed project by the Coastal Commission as required. The importance of the Farallones in this regard would appear to be significant.

As Dr. Janes has indicated, "Protection and preservation of these structures are essential, as well as non-invasive testing to further describe them." We are both deeply concerned about the Farallones poison drop and ask that the Coastal Commission not condone it.

In the current political climate honoring California's Native American traditional cultural heritages, this is also a special opportunity to endorse a positive outcome, not just for the Farallones as a sacred place, but for all that occupy it. Native American beliefs include that all of nature is sacred and alive, has inherent right to exist, and is perpetuated in a sensitive, dynamic balance. If we intervene harshly and disrupt that balance, we risk its peril and ours.

If Coastal Commissioners believe the mouse population at the Farallon Islands needs to be addressed, an alternative utilizing low to no risk methods would be more relevant to consider.

Lou-Anne Fauteck Makes-Marks, M.F.A., M.A., Ph.D.

Director, Sacred America

European, Asian, Coast Miwok, Kashia Pomo, Kamchadal/Aleut, Creek, Shawnee, Virginia/Maryland Algonquin, and Southeastern Sioux

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1. Paulette F. C. Steeves, 2021, *The Indigenous Paleolithic of the Western Hemisphere*, Lincoln, Nebraska: University of Nebraska Press.
2. http://emvc.geol.ucsb.edu/2_infopgs/IP2IceAge/cSFBayFlood.html
3. <https://www.smithsonianmag.com/science-nature/how-humans-came-to-americas-180973739/>

From: [Noel-Anne Brennan](#)
To: Energy@Coastal
Subject: Farallon Islands Poison Drop
Date: Wednesday, November 24, 2021 9:18:15 PM

The Farallon Islands, just off the coast, are wild and starkly beautiful. They are deserving of the many layers of protection afforded them over the years, including designating them a National Marine Sanctuary and a National Wildlife Refuge. The California Coastal Commission should not condone the use of deadly environmental poisons on these islands.

In 2020, legislation was passed and signed by Governor Newsom, outlawing the use of this very same poison (the anticoagulant rodenticide, brodifacoum) in California. This is because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats and other predatory animals tested by WildCare (in Marin County) have this poison in their blood. Other studies across the country have shown similar impacts on Bald Eagles and Red-Tailed Hawks.

It is impossible for anyone to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone, only affecting the rodents it is intended to kill. Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or debilitating both the nontarget animals that consume the poison, and the animals that consume those that have eaten the poison.

For these reasons, we strongly urge you deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project. Thank you for your consideration and your leadership.

Sincerely,

Noel-Anne Brennan

From: [Ernie](#)
To: Energy@Coastal
Subject: Farallon Islands rodent kill
Date: Wednesday, November 24, 2021 9:40:01 PM

The proposed poison has doubtful efficacy, and great potential for migrating up the food chain and affecting many other species. This is not an environmentally sound procedure. Please look elsewhere for a solution.

Ernetta Skerlec

Sent from [Mail](#) for Windows



Virus-free. www.avast.com

From: [RICHARD VAN AKEN](#)
To: Energy@Coastal
Subject: Farallon Islands rodent solution
Date: Wednesday, November 24, 2021 5:13:54 PM

The proposal has too many potential negatives for the other wildlife. What the answer is remains to be seen. The removal of the eagles saved the foxes on the Channel Islands but the Burrowing Owls are migratory and removing them doesn't necessarily mean others will not replace them.

From: [Gabrielle Menendez](#)
To: Energy@Coastal
Subject: Farallon
Date: Wednesday, November 24, 2021 7:37:30 PM

Some years ago I have the privilege of being on that island and seeing the wonder and beauty of all the life on it. This poison plan is unbelievably ill thought out and immensely harmful to ALL life on the island. There is always a better way. Please do not do this ill conceived attack on the beauty of this land.

Gabrielle Menendez

From: [Susannah Norris-Lindsay](#)
To: Energy@Coastal
Subject: Farollan Islands poisoning
Date: Wednesday, November 24, 2021 1:46:26 PM

I am writing to request that you abandon the plan to drop poison to kill mice. It is impossible to restrict the poisoning to just mice. An alternative form of mice management must be implemented.

Poisoning the ecosystem is not management, it is negligence.

Thank you

S. Norris

From: doug.gemmell3@frontier.com
To: Energy@Coastal
Subject: Help
Date: Wednesday, November 24, 2021 1:40:09 PM

Please do not drop environmental poisons on the Farallon Islands. The effect will reach far beyond the mice you are targeting.

Sincerely,

Doug Gemmell

From: [zoltek](#)
To: [Energy@Coastal](#)
Subject: I am opposed to the Farallon Islands poison drop
Date: Wednesday, November 24, 2021 6:42:02 PM

To Whom It May Concern:

I am opposed to the Farallon Islands poison drop.

Yours truly,

Andrew Towne

1050 E. Ramon Rd. # 101
Palm Springs, CA 92264
(619) 517-2185

Sent with [ProtonMail](#) Secure Email.

From: [Lau G C](#)
To: Energy@Coastal
Subject: Important matter for your consideration.
Date: Wednesday, November 24, 2021 5:06:41 PM
Importance: High

It is impossible for anyone to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone, only affecting the rodents it is intended to kill. Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or debilitating both the nontarget animals that consume the poison, and the animals that consume those that have eaten the poison.

Sincerely,

Laura Arias

Marina del Rey 90292

From: [Yahoo!](#)
To: Energy@Coastal
Subject: Our family demands consideration of unintended consequences of "Brodifacoum"!
Date: Wednesday, November 24, 2021 5:22:39 PM

There is no 'safe' level of usage of these, second-generation, anticoagulants, and, our family demands that you, carefully, consider the, unintended, consequences before supporting any use of these poisons on the Farallon Islands! The "California Coastal Commission" MUST protect our beautiful, coast, NOT condone the use of, deadly, environmental poisons!

Worldwide, thirty-eight-percent (38%) of the, initial, aerial applications of this same, "Brodifacoum" rodenticide bait, during, eradication, efforts to control mice, on islands, have failed to, fully, eliminate the mice. Since it is not uncommon for an initial, "Brodifacoum" drop to fail to, fully, eradicate mice, a, follow-up, repetition of recurring, poison applications is, often, tried during the, following, years. Mice, in particular, tend to, quickly, develop a, genetic, resistance to, such, rodenticides, further, complicating the, escalating, biological risks for, harmless, non-target, species in the path of what, then, becomes an, inevitable, series of, repeated, multi-year, poison drops!

Unanticipated harm to ecosystems, on other islands, around the globe, resulting from spreading this, same, poison is well-documented. Not surprisingly, follow-up, analytical, studies found that brodifacoum" was still, present in fish, within the, drop, zone, three years after the, 2012, helicopter distribution of this, same, chemical, on Wake Island, in the middle of the Pacific Ocean! The U.S. Air Force, following the "Brodifacoum" application there, that failed to kill all, of the, targeted, rats, recommended a restriction on, human, consumption of fish for 942 days!

With hopes for a more rational, more thorough, more honest, and, more objective, assessment of the, environmental, impacts of this poison,

**DIANE M. KASTEL AND FAMILY
SAN FRANCISCO, CA**



From: [Abbie Bernstein](#)
To: Energy@Coastal
Subject: please do not drop poison on the Farallon Islands
Date: Wednesday, November 24, 2021 1:39:38 PM

Hello, my name is Abbie Bernstein. I reside at 1245 N. Kings Rd., West Hollywood, CA 90069. I am writing to respectfully request that you do *not* drop poison on the Farallon Islands. The poison is guaranteed to kill not only the mice it is intended to kill, but wildlife that feeds on the mice, other wildlife on the island, and marine life in the surrounding area. Please do not do this. It will do much more harm than good.

Sincerely,
Abbie Bernstein

From: [Tina Brenza](#)
To: Energy@Coastal
Subject: Please don't drop poison on The Farallon Islands!
Date: Wednesday, November 24, 2021 10:47:31 PM

The Farallon Islands, just off our coast, are wild and starkly beautiful. They are deserving of the many layers of protection afforded them over the years, including designating them a National Marine Sanctuary and a National Wildlife Refuge. **The California Coastal Commission should not condone the use of deadly environmental poisons on these islands.**

Thank you,
Tina Brenza

From: [J Perinchief](#)
To: Energy@Coastal
Subject: Please stop the poison drop on the Farallon Islands
Date: Wednesday, November 24, 2021 6:04:49 PM

Since Governor Newsom has outlawed the use of brodifacoum in California, the obvious mandate is to oppose the poison drop on the Farallon Islands.

Thank you for considering my request.

Jana Perinchief

From: [Phyllis Chu](#)
To: Energy@Coastal
Subject: Please, NO Farallon Islands Poison Drop to kill rats who will poison all who eat their bodies and ultimately reaching human consumption chain
Date: Wednesday, November 24, 2021 2:07:40 PM

How about sterilizing rats instead? It cuts down their population limiting massive future generations? Why wasn't this initiated 10 years ago when rats were first tracked???? It would have prevented the overrun currently happening had anyone had foresight of their great breeding survival.....which other scientists have known for decades.

Sterilization of the rats will mean their predators can eat them without being also poisoned. There will be no runoff of poison to kill seafoods humans also eat. Invest in trapping/ killing and sterilizing the rest of the rats on consistent basis will result in the rats disappearing ---this will be least invasive way of killing one invasive predator of eggs without poisoning so many other species same time.

Phyllis Chu
415 468-5400

From: [NANCY TELESE](#)
To: Energy@Coastal
Subject: Poison
Date: Wednesday, November 24, 2021 6:18:10 PM

Dear Sir,

I am highly opposed, as I am
sure others are also of dropping this highly toxic poison
Please reconsider your detrimental decision, with no consideration of our environment
Please stop this atrocity in the making now, while you can.

Thank you for your time

Sincerely,

Nancy Telese
Palm Beach, Fl.

Sent from my iPhone

From: [Kathleen/Kate](#)
To: Energy@Coastal
Subject: Poison Drop Farallon Islands
Date: Wednesday, November 24, 2021 2:10:45 PM

Have you learned nothing from the previous years of disastrous choices!?

This rodenticide will enter the food chain there is no way it can be stopped. It will get into the waters killing marine life. Don't you think we have assaulted the oceans enough!?

Find a non toxic method not the easiest for you.

Kate Ashley

Sent from my Galaxy

From: [Kate Kenner](#)
To: Energy@Coastal
Subject: Poison drop on the Farallon Islands
Date: Wednesday, November 24, 2021 3:04:00 PM

Good day,

I have just read of the proposal drop poison on the Farallon Islands and feel it is an unsound and unethical plan. First of all, no animal should ever be poisoned for it is slow and excruciating death. Second, the targets maybe the mice (who are there because of people) but other animals could be severely affected as well-those live here permanently and those who'll ingest and carry it elsewhere. No one knows how far reaching the effects will be thus the poison drop should be scrapped immediately.

Thank you for your time.

Sincerely,
Kate Kenner

From: [Olive](#)
To: Energy@Coastal
Subject: Poison drop on the Farallons
Date: Wednesday, November 24, 2021 2:39:33 PM

This is the worst possible solution to the rodent problem. Any creature that eats a poisoned rodent will also be poisoned. Seabirds have enough problems finding food without being killed for eating.

Further, there is no way to confine this illegal rodenticide to the Farallons. Birds migrate, raptors eat birds. Legislation in 2020, signed by Governor Newsom, outlawed the use of this rodenticide. The Farallons are not exempt.

Please find another way to take care of the mice. This approach is unnecessary, illegal, and would have consequences to our fragile ecosystems far beyond any effect on mice.

Yours irately,
Olive DePonte

Sent from my iPad

From: [Elizabeth Lynn](#)
To: Energy@Coastal
Subject: Poison on Farallon Islands
Date: Wednesday, November 24, 2021 3:11:57 PM

I am adamantly opposed to using poison on Farallon Islands. We should be protectors, not environmental destroyers. This poison is unnecessary and will have environmental catastrophic, long-ranging effects. This poison is documented to have a disastrous impact all the way up the food chain, and the birds flying and dying over the ocean and on other lands will impact and poison wildlife there as well.

Elizabeth Lynn
Resident of Marin County

From: [Dana London](#)
To: Energy@Coastal
Subject: Poisoning mice on Farralons
Date: Wednesday, November 24, 2021 7:05:40 PM

I am strongly opposed to the use of a banned anticoagulant poison to rid the island of mice! It is known that any birds ingesting these rodents will be certainly poisoned as well, not to mention the poison being removed from the island!!

Please use natural methods to reduce the rodent population, specifically owls., and support of the owls by putting up owl boxes!

Thank you. Dana London
Dmlondon53@yahoo.com

Sent from my iPhone

From: [Gloria Schneider](#)
To: Energy@Coastal
Subject: PUblic Comment Consistancy Determination by USFWS Rotencide Drop on South Farallon Island
Date: Wednesday, November 24, 2021 4:02:49 PM

Dear Commisioners.,

I am requesting that you DENY the US Fish and Wildlife Services's request for poison (rotenicides) to be aerially applied to South Farallon Island for the following reasons:

- Despite the favorable staff position this proposal is environmentally dangerous and will result in great harm to ecosystems far beyond those on the island itself.
- There is no 'safe' level of usage of these anticoagulants rotenicides and we hope you will carefully consider the unintended consequences before supporting any use of these poisons on the Farallon Islands. The California Coastal Commission should protect our beautiful coast, not condone the use of deadly environmental poisons.
- It is impossible for anyone to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone, only affecting the mice it is intended to kill.
 - Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or debilitating both the non target animals that consume the poison, and the animals that consume those that have eaten the poison.
 - Legislation was passed and signed by Governor Newsom in 2020 outlawing the use of this very same poison (the anticoagulant rodenticide, brodifacoum) in California because of the documented impact on predators up the food chain.
 - There will be Western Gulls that get sick and die from the use of the poison on the island. The gull population is not constrained to the Islands, and in fact the birds circulate widely. Given how far gulls travel to and throughout the mainland, how could anyone stop the poison from entering the food chain in regions around the Bay?
 - ■ The USFWS assertions that the poison will not leave the island are based on hazing trials conducted when there were not edible cereal

pellets of poisoned bait OR dead and dying mice strewn across the island.

- Deterring hungry gulls from a readily-available food source is virtually impossible, especially long-term.
- There are more environmentally safer ways to achieve the desired species protection such as
 - Integrated Pest Management (IPM) is far more effective and safer
 - on the Farallon Islands this would also include relocation of the 6 - 10 burrowing owls that also threaten the endangered seabirds.
- The Farallon Islands, just off our coast, are wild and starkly beautiful. They are deserving of the many layers of protection afforded them over the years, including designating them a National Marine Sanctuary and a National Wildlife Refuge. The California Coastal Commission should not condone the use of deadly environmental poisons on these islands

For the above reasons I strongly urge that you deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project.

Thank you for your consideration,

Jerry Schneider
4113 Sea view Avenue
Los Angeles, CA 90065

From: [Morgan Feilmeier](#)
To: Energy@Coastal
Subject: Re: Farallon Island Rodenticide Drop
Date: Wednesday, November 24, 2021 2:02:20 PM

Good Afternoon,

I am writing in regards to the proposed plan to use rodenticide to control the mice population on the Farallon Islands.

Please, please, please reconsider this plan. Not only was this poison banned from use by the general public due to it's catastrophic impacts on raptors, scavenging birds and predatory mammals; there is no way to control the poison from spreading outside of this particular island's ecosystem. Once it has entered the ecosystem, through scavengers or predatory creatures eating the mice, not only will it kill those particular animals on top of the mice, it will also then impact creatures that are scavenging those bodies, etc. Some of the animals, like gulls, that feed on these islands, are not isolated to the Farallons and have been known to travel to and from the mainland.

There are multiple other methods that can be implemented to control the mouse population, including the use of predatory birds, traps, etc.

With all due respect, this is an incredibly shortsighted program and, as a native Californian who has dedicated my work to creating habitat in people's gardens for our native wildlife, I implore you to rethink this strategy that puts so many of our native creature's lives at stake.

Sincerely,

Morgan Feilmeier

Argia Designs

Landscape Design + Consultation

760.420.2411 | argiadesigns@gmail.com | www.argiadesigns.com

From: dianoran@aol.com
To: Energy@Coastal
Subject: Re: Poison drop on the Farallon Islands
Date: Wednesday, November 24, 2021 6:49:46 PM

- **The California Coastal Commission should not condone the use of deadly environmental poisons on these islands.**

**Sincerely,
Dianora Niccolini**

From: [Terri Ducay](#)
To: Energy@Coastal
Subject: Stop the Poison
Date: Wednesday, November 24, 2021 6:15:01 PM

Dear Person,
I request you to NOT go ahead with plans to use poison on South Farallon Island.

It is impossible for anyone to ensure that the massive load of poison proposed to be strewn across the South Farallon Island will remain on the island alone, only affecting the rodents it is intended to kill. Poison will end up in the water and kill marine life. It will also be in the bodies of birds leaving the islands. These poisons travel up the food chain, killing or debilitating both the non-target animals that consume the poison and the animals that consume those that have eaten the poison.

Thank you,
Terri Ducay

--

"Never doubt that a small group of thoughtful individuals can change the world. Indeed, it is the only thing that ever has." - Margaret Mead

Terri Ducay
650 407-7603
American Wild Horse Campaign
www.americanwildhorsecampaign.org

From: [Kian Schulman](#)
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Wednesday, November 24, 2021 7:50:18 AM

Dear Commissioners,

We would like to request that you **REJECT** the request for a consistency determination on the pending US Fish and Wildlife Service poison dispersal plan for Southeast Farallon Island.

What's being allowed to take place in conservation circles is **WRONG**.

The proposal recommends **killing** and **poisoning** sentient beings with painful poisons, and contaminating the environment as we intervene in complex trophic cascades to "save" Nature from itself.

Poison keeps poisoning - poisoning non-target wildlife, breaking down into the ecosystem, and eventually poisoning us!

Whether directly or indirectly, we will not survive ignorance on the part of our policymakers, regulators, and the corporate interests of Big Ag and Big Pesticide who influence them.

The environment and wildlife need to be protected, not the pesticide industry profits and industry-"advised" grant funding.

The proposal targets the middle of a State Marine Reserve using a known deadly poison.

Pesticide industry stakeholders have been a central source of advice for the government agencies for the handling of invasives from the beginning.

Unfortunately, they have inserted themselves into the funding committees and spend much money sponsoring the academics who buttress their claims, therefore influencing a disturbing amount of decision making on how this is done.

It's a travesty of governance and independence lost.
Major conflicts of interest rule this roost.

Please reject this item - it would set a terrible precedent for the
Sanctuary waters and elsewhere.

Thank you for your moral compass and ethical support.

Kian

Kian Schulman RN, MSN
Director, Poison Free Malibu
[Email: PoisonFreeMalibu@gmail.com](mailto:PoisonFreeMalibu@gmail.com)
Websites: PoisonFreeMalibu.org
Facebook: Poison Free Malibu
Phone: 310-456-0654

poison free Malibu



From: [Anne Scanlan-Rohrer](#)
To: [Farallon Islands Consistency](#)
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Wednesday, November 24, 2021 11:02:10 AM

Dear Commissioners,

I am writing to request that you concur with your own staff's recommendation and approve the upcoming request for a consistency determination for the US Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands.

I have been supporting and following Point Blue's work for over 30 years. I know the deep integrity of this organization and am certain they would have researched all possible means of eradication thoroughly. They have shown the significant disturbance to the islands' sensitive ecosystem caused by the house mice.

I believe in their research that shows that 100% eradication of the house mice must be achieved, and that the method of an aerial broadcast of the rodenticide Brodifacoum is the best solution..

Thank you for your consideration and for following the best available science when making your decision.

Sincerely,

Anne Scanlan-Rohrer
annesr@mindspring.com
650-343-1465

From: [Elana Varner](#)
To: [Teufel, Cassidy@Coastal](#); [Farallon Islands Consistency](#)
Subject: Farallon islands policy memo
Date: Monday, November 22, 2021 11:53:49 AM
Attachments: [pastedImage.png](#)
[Farallons Policy Memo - Elana Varner - 22Nov2021.pdf](#)

Dear California Coastal Commission and related decision makers,

As a PhD candidate in rodent chemical ecology, I have written the following policy memo urging caution against dropping anticoagulant rodenticides on the Farallon Islands. Below is the executive summary and attached is the full memo:

EXECUTIVE SUMMARY

Sublethal anticoagulant rodenticide exposure may cause population declines in migratory birds and marine life

The U.S. Fish and Wildlife Service and Scientists Recommend Caution:

University of California Agriculture and Natural Resources scientist: "a critical question yet to be answered is if the [sublethal] rodenticide exposure... contributes to population decline."

The U.S. FWS: "assessment of potential effects to... sensitive populations of migratory birds has not been completed to date for any currently registered rodenticide. Thus, reliance solely on labeled use restrictions may not adequately protect vulnerable species of wildlife."

Concerning recent findings:

Migratory Birds:	Marine Life and Turtles:
<ul style="list-style-type: none">• No study has yet tested if sublethal AR exposure affects migratory birds' ability to orient properly for and complete migration.• Hazing efforts may prevent birds from directly eating poisons, however, AR permeates through the food web (i.e., via poisoned ants, hermit crabs and fish) and will secondarily poison birds.• The island ecosystem will contain ARs for a prolonged period of time, likely into the bird migration season.• Sublethal effects could have direct impacts on individual survivorship and cause population decline.	<ul style="list-style-type: none">• Hermit crabs and fish contain significant amounts of ARs after aerial drops which will then poison their respective food webs.• A 2021 study found turtles are more sensitive than rats to first-generation AR, warfarin.• Exposure to the more acutely toxic second-generation ARs intended for the Farallon Islands will be significantly worse for the islands' 4 turtle species, 2 of which are endangered.

Top recommendation:

Do not blanket the Farallon islands with anticoagulant rodenticides and instead explore using less toxic and more eco-friendly Integrated Pest Management alternatives that already exist.

Regarding AR risks and Integrated Pest Management alternatives on the Farallon islands, please do not hesitate to contact me with any questions or concerns.

Elana Varner
evartner@sfu.ca | 1.508.893.1863

Masters of Pest Management
Rodent Chemical Ecology | PhD Candidate

Please feel free to share this with others and contact me directly with any follow-up questions or concerns.

All the best,

EXECUTIVE SUMMARY

Sublethal anticoagulant rodenticide exposure may cause population declines in migratory birds and marine life

The U.S. Fish and Wildlife Service and Scientists Recommend Caution:

University of California Agriculture and Natural Resources scientist: “a critical question yet to be answered is if the [sublethal] rodenticide exposure... contributes to population decline.”

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Concerning recent findings:

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Top recommendation: **Do not blanket the Farallon islands with anticoagulant rodenticides** and instead explore using less toxic and more eco-friendly Integrated Pest Management alternatives that already exist.

Sublethal anticoagulant rodenticide exposure may cause population declines in migratory birds and marine life

The scientific findings are definitive: non-target species' exposure to anticoagulant rodenticides (ARs) is pervasive and ubiquitous across trophic levels and throughout food webs. A question science has yet to dissect, however, is how this widespread sublethal exposure affects these countless species and if there are population level impacts. This leaves a knowledge gap that allows some to purport that the sublethal effects of ARs are likely negligible and not of major concern. However, simply because sublethal effects have not been studied yet does not mean they do not exist. It only means the studies have not been done yet. Scientists and federal regulators caution against this as our recent history with neonicotinoids demonstrates that assuming a pesticide's sublethal effects are negligible is dangerous: only when the sublethal effects were fully studied did their disastrous consequences, including a global decline in bird populations, come to light. Below I elucidate how catastrophic this assumption has been in the past and how the **recent studies done to assess the sublethal effects of ARs now suggest lethal fitness consequences that may have population level impacts for migratory birds and marine life.**

A history of assuming negligible sublethal effects: A cautionary tale

Neonicotinoids, a class of pesticides used for controlling insect populations, have been used globally in agriculture for 30 years, mirroring the broad global use of ARs in the same timeframe. Until recently, it was assumed that because "neonicotinoids typically bind more strongly to insect receptors than vertebrate receptors, [they] were thought to pose a lower risk for humans and non-target vertebrates than [their predecessors] the organophosphates" (Eng et al., 2017). Decades, and numerous studies later, the scientific community was able to demonstrate that this assumption was false. In 2013, after 20 years of use, neonicotinoids were connected to colony collapse disorder in honeybees. This year, scientists found neonicotinoids present in non-target species across trophic levels – from insects to barn owls (Humann-Guillemot et al., 2021), consistent with current ubiquitous findings of ARs permeating through food webs and across broad trophic levels.

In 2017, a study found devastating sublethal effects of neonicotinoids on migratory birds: the sublethal effects compromised the birds' migratory orientation, activity, and body mass (Eng et al., 2017). To reiterate, although sublethal levels of neonicotinoids do not kill a migratory bird directly, the inability to store enough energy and fly in the right direction because of the sublethal exposure cause death. Last year, a study showed that neonicotinoid effects led to a global decline in bird populations (Li et al., 2020). **No study has yet tested if ARs affect a bird's ability to orient properly for and complete migration.**

Learning from this cautionary tale where sublethal effects on non-target animals were assumed to be low, neonicotinoid scientists now caution: "In the past, we underestimated the risks of widely used pesticides. As we work to replace older insecticides with less toxic alternatives, we must use caution to prevent similar mistakes" (Eng et al., 2017). This caution is even more pressing since the Farallon islands proposal uses second-generation ARs (SGARs) which are, by design, more toxic than their first-generation predecessors.

Current knowledge of ARs sublethal effects

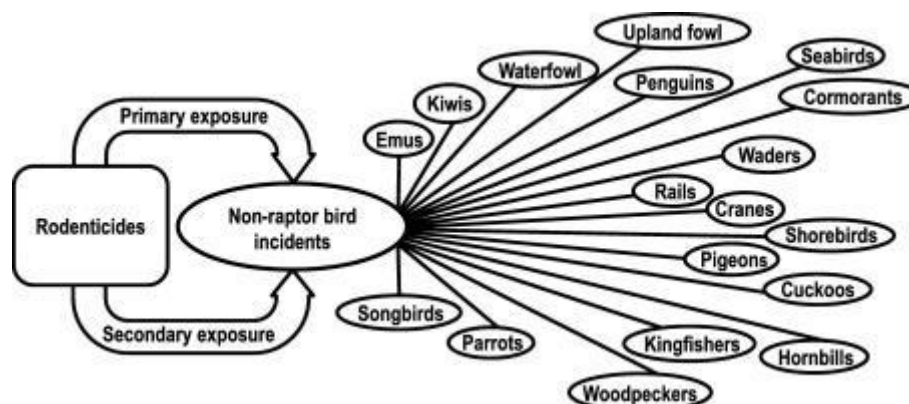
Sublethal AR effects can compromise the fitness of an individual animal. Sublethal AR effects include lethargy, anorexia, bloody diarrhea, joint tenderness, shortness of breath and changes in behavior (Cox & Smjtii, 1992; Littin et al., 2000; Munday & Thompson, 2003). New evidence mounting in the past 5 years shows that sublethal AR doses can compromise the immune system, resulting in higher disease, parasite and pathogen burdens in exposed individuals including rats, bobcats, and birds (Lemus et al., 2011; Murray & Sánchez, 2021; Serieys et al., 2018). This is the case in numerous species but has yet to be studied.

The symptoms of sublethal AR exposure likely increase the odds of car strike and window strike. Unfortunately, when dissected, necropsies generally classify these deaths as trauma induced with no mention of ARs as a contributing factor (Zehel, 2021). In the above noenicitinoid example, this would be akin to the cause of death for a migratory bird being low flight weight with no mention of the sublethal pesticide exposure that caused the weight loss. Therefore, the number of non-target wildlife deaths resulting from sublethal AR exposure is currently unknown.

The science is clear that sublethal AR exposure can compromise an individual animal's fitness, however, as a scientist with the University of California Agriculture and Natural Resources points out, **"a critical question yet to be answered is if the rodenticide exposure documented in individual animals inhibits population growth or contributes to population declines by lowering survival and reproductive success.** This information is essential to the regulatory agencies that must weigh the risks and benefits of rodenticide uses and identify restrictions that are effective in reducing risks to wildlife" (Quinn, 2019).

Migratory birds exposed to anticoagulant rodenticides

The effects of anticoagulant rodenticides are primarily studied in birds of prey; however, non-predatory birds are exposed to ARs as well, including seabirds and shorebirds (Vyas, 2017). See below for a graphical depiction of the exposure pathways.



Although we know they are exposed, there has not yet been a study to examine the sublethal effects of ARs on migratory birds. Possible sublethal effects could compromise birds' migratory orientation, activity, and body mass. **The U.S. Fish and Wildlife Service has highlighted this dangerous knowledge gap,** stating "a comprehensive assessment of potential effects to... sensitive populations of migratory

birds has not been completed to date for any currently registered rodenticide. Thus, reliance solely on labeled use restrictions may not adequately protect vulnerable species of wildlife. Rodenticides have been associated with mortality incidents involving the endangered San Joaquin kit fox, the previously endangered bald eagle and peregrine falcon, and numerous species of migratory birds” (Golden, 2006). This is a dangerous knowledge gap, as seen in the neonicotinoid case study above, since **sublethal effects could have direct impacts on individual survivorship and cause population decline.**

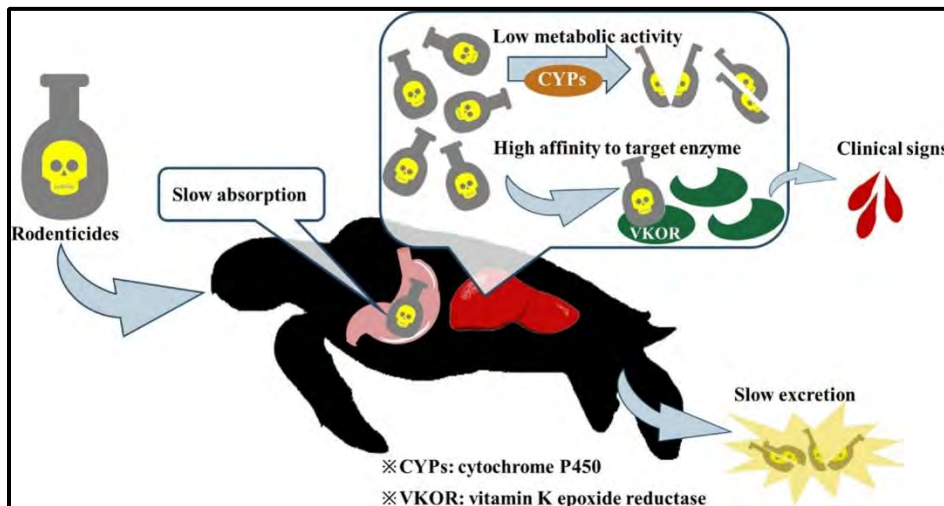
Therefore, **I strongly urge the state of California to act with prudence and not blanket the Farallon islands, a vital stopover in the global migratory bird corridor, with ARs that could directly compromise the fitness and lead to population declines of these migratory birds.**

ARs saturate the ecosystem and for an unknown amount of time

With hazing efforts in place, shorebirds may not eat poison baits directly, however, AR poisons permeates through the food web to secondarily poisons birds. A 2015 study showed ants and other insects consume significant amounts of AR baits (Pitt et al., 2015), ensuring exposure of land-based food webs. In the marine environment after an aerial drop, all hermit crabs and fish tested contained significant AR levels (Pitt et al., 2015). Resultantly, “although detection of residues in samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected” (Pitt et al., 2015). In both terrestrial and marine food webs, detectable AR levels were found at least 60 days after the drop, leading to the suggestion that future surveys track AR levels at for at least 180 days (Pitt et al., 2015). Although more research needs to be done, it is clear that “the risk of exposure to other organisms may persist for many months following application of brodifacoum bait” (Pitt et al., 2015). These two exposure pathways ensure that **the island ecosystem will be exposed to ARs for prolonged periods of time, likely into the bird migration season.**

Marine life and anticoagulant rodenticides

While AR effects on marine systems were previously assumed to be minimal, recent studies suggest the persistence, exposure and risk are greater than originally thought (Regnery et al., 2019). The exposure pathway is not well understood, but after an aerial drop, all hermit crabs and fish sampled had significant levels of ARs with detectable levels present at least 60 days post drop (Pitt et al., 2015). Risk of fish mortality is thought to be low, as fish are not as sensitive to ARs, and a ‘no fishing period’ is advised to prevent human exposure (Masuda et al., 2015). However, there is no way to protect marine food webs against AR exposure. Concerningly, recent evidence shows that turtles are highly sensitive and slow to metabolize warfarin, a first generation ARs (Yamamura et al., 2021). The second-generation ARs proposed for aerial drops on the Farallon islands are, by design, more acutely toxic than first-generation ARs, making the **poison effects on turtles significantly worse for the Farallon Islands’ 4 turtle species, 2 of which are endangered** (*Sea Turtles in the Sanctuary - Greater Farallones Association*, n.d.).



This figure, from (Yamamura et al., 2021), is depicting the exposure pathway of ARs to turtles and turtles' lowered ability to metabolize the poison. Resultantly, green turtles are more sensitive than rats to warfarin, a first-generation AR.

Recommendations for the Farallon Islands

Given the potential for sublethal AR effects to cause population decline in migratory birds and marine life, before blanketing the Farallon Islands with ARs my **baseline recommendation** is to:

- study ARs sublethal effects on various migratory birds' fitness and ability to migrate.
- examine the sublethal effects of ARs on marine life, specifically turtles and marine mammals.

While the above is a minimum recommendation, my **top recommendation is to not blanket the Farallon islands with anticoagulant rodenticides** and instead explore the less toxic and more eco-friendly Integrated Pest Management (IPM) alternatives that already exist.

Regarding AR risks and IPM alternatives on the Farallon islands, please do not hesitate to contact me with any questions or concerns.

Sincerely,

Elana Varner

Elana Varner

Masters of Pest Management
Rodent Chemical Ecology | PhD Candidate
evartner@sfu.ca | 1.508.893.1863

References:

- Cox, P., & Smitt, R. H. (1992). Rodenticide ecotoxicology: Pre-lethal effects of anticoagulants on rat behaviour. *UC Agriculture & Natural Resources Proceedings of the Vertebrate Pest Conference*, 15, 15. <https://escholarship.org/uc/item/5883j4pn>
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From: [Linda Remy](#)
To: [Farallon Islands Consistency](#)
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Thursday, November 11, 2021 11:00:13 PM

Dear Commissioner:

I live in Belvedere with a beautiful view that I absolutely treasure looking out on the wonderful San Francisco Bay every day. My dear dog almost died when a neighbor sprayed toxic pesticides on the tree she was sleeping under. This event now 40 years ago woke me up to the dangers of toxic chemicals.

Please, please find another, more environmentally safe way to reduce the rat population than dropping metric tons of rat poison bait pellets in the Greater Farallones National Marine Sanctuary. Have mercy on the other critters. Reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan.

As you know, this proposal targets the middle of a treasured State Marine Reserve and would also be right in the midst of our longstanding National Marine Sanctuary within whose waters such activities are expressly precluded. Sanctuary regulations even ban pollutants that "enter and injure" sanctuary resources from outside of the boundary of the sanctuary. As a constituent and admirer of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I must ask that you deny the requested consistency finding for item W14a.

It remains incumbent on the Wildlife Service to find a more targeted and environmentally benign single-species approach at the Farallones, one less dependent on persistent food-chain poisons that have a known record of killing animals that are not part of the problem. Responsible stewardship of America's public trust living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach.

Please reject consistency for item W14a, since to do otherwise would set a terrible precedent for both the Commission and for our Sanctuary waters and its other critters.

Thank you very much.

Linda Remy

Belvedere, CA 94920

From: [creek shade](#)
To: californianature@resources.ca.gov; [Farallon Islands Consistency](#)
Subject: Comments Regarding the 30x30 initiative: US Fish and Wildlife Commission utilizing rodenticide drop - Farallones
Date: Tuesday, November 9, 2021 4:25:53 PM
Attachments: [image.png](#)

Respected Biologists and Managers,

My understanding is that you are considering the use of toxic rodenticide drops over the Farallones.

I would like to draw your attention to a 2-year risk assessment study examining the toxic effects of rodenticides on non-target animals including raptors. Our study used ecological risk assessment calculations based on previously established toxicity data, and included a wide variety of commonly used rodenticides including diphacinone, imidacloprid and zinc phosphide. Please note that brodifacoum, which has been used in the past, is a rodenticide in the same anticoagulant family as diphacinone. Imidacloprid is sometimes blended into the anticoagulant rodenticides and is also extremely toxic to non-target receptors including native birds (Mineau and Palmer 2013).

As the name indicates, anticoagulant rodenticides cause animals to bleed internally. Causes of mortality are internal hemorrhaging and related toxicity effects (McMillin 2017); non-target wildlife is definitely impacted (Lima and Salmon 2010; Hosea 2000; US EPA 1998a). Significant toxic impacts have been observed on screech owls, great-horned owls and golden eagles. These previously obtained toxicity studies indicate negative impacts are anticipated for burrowing owls and other native birds.

Our study concluded that rodenticide drops would have heavy impacts on non-target wildlife including protected and sensitive species. Furthermore, many rodenticides can persist, which can result in exposure over longer terms.

Please consider my note as a strong recommendation against pesticide drops on the Farallone Islands. We cannot afford to lose more wildlife. Please consider using non-toxic rodent removal options, if at all, or benign neglect.

Multiple other references and our exposure dose calculations are available if desired.

Best regards,

Maya Khosla

Wildlife Biologist and Toxicologist

rry Hanson, President, California River Watch, www.criverwatch.org

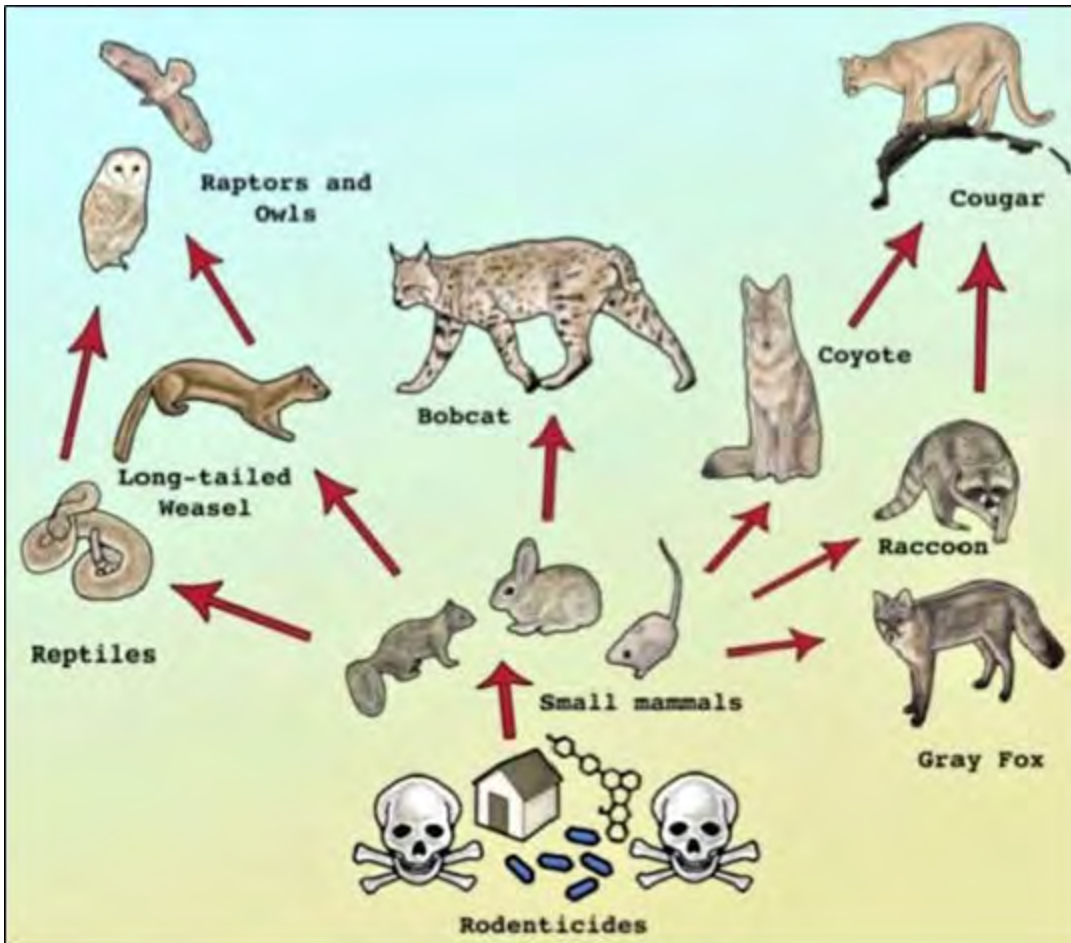
Selected References

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[2020 PEN Oakland / JOSEPHINE MILES AWARD for All the Fires of Wind and Light](#)

From: [Ann Shippey](#)
To: [Farallon Islands Consistency](#)
Subject: Concerning the drop of Poison to the Farallons
Date: Friday, August 27, 2021 8:32:11 AM

To Whom it May Concern,

As a native Californian and resident of the Bay Area I am shocked to learn of the possible Poisoning campaign of Ca. Fish and Wildlife! Please put an end to the rodenticide policy of Fish and game to the Fragile ecosystem of the Farallon Islands! Thank you for listening to the citizens of California!

Ann Shippey

Roma Kumar
P.O. Box 843
Fairfax, CA 94978
415-456-6893

June 5th, 2021

Dear Stephen Pedilla,

I totally oppose any use
of toxic chemicals to kill the mice
population on the Farallones.

We certainly must protect the
stormy petrel population. But the
use of such ^{poisonous} ~~poisons~~ and
environmentally dangerous chemicals is
not a good option.

We should instead insist that
science develops safe, non-violent methods

for protecting the threatened populations
of birds, salamanders and crickets.

A truly healthy solution is
possible. This can be developed only
when we insist that old and
destructive methods using rodenticides
and other poisons be banned ~~for~~ from
use.

Thank you,

Rama Kumar

P.O. Box 843

Fairfax, CA 94978

tel: 415-456-6893

email: ramakumarjones@gmail.com

From: [Dianne Hales](#)
To: [Farallon Islands Consistency](#)
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Wednesday, June 16, 2021 4:17:03 PM

Dear Commissioner:

I am writing as a longtime resident of northern California, a concerned citizen, a constituent of the California Coast Commission and a journalist covering environmental issues on the North Coast. I entreat you and your colleagues to reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan. This proposal puts at risk all the inhabitants of an invaluable State Marine Reserve.

The Wildlife Service must find a more targeted single-species approach at the Farallones. Responsible stewardship of America's living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach. We cannot, must not, shirk this responsibility.

Please reject consistency for item W14a. Failure to do so would set a terrible precedent for both the Commission and for our Sanctuary waters.

With appreciation for your commitment to protecting our priceless coast and all its inhabitants,

Dianne Hales
20985 Pelican Loop
Bodega Bay, Ca. 94921

From: [Thomas Yarish](#)
To: [Farallon Islands Consistency](#); drop19@sonic.net
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Tuesday, May 4, 2021 11:19:35 PM

Dear Commissioner:

I am writing to request that you reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan.

In addition to the points made by many concerned members of the public I would like to incorporate my own few observations and requests into the formal record.

1. TOXIC PROFILES NOT DISCUSSED OR DOCUMENTED. ANTI-COAGULANTS MOVE UP THE FOOD CHAIN.

I have not seen an adequate risk analysis of either chronic or acute toxicity in off-target species. Considerable evidence shows that rodenticides can move broadly up and across the entire food chain in the exposed area, including insects, raptors and other wildlife through either direct or indirect consumption.

Nor have I seen an analysis that insures that the Petrels themselves will not directly or indirectly consume the bait or its by-products from ingesting contaminate insects, fish, etc.

It is not clear that the long-term mutagenic, carcinogenic, teratogenic, neurological, behavioral or other epigenetic effects will not adversely impact both target and off-target species for many generations, producing unpredictable morbidity, mortality and adaptations. The environmental fate of the poison agent, its inert components and long-term breakdown products must be fully discussed and entered into the public record prior to any other findings.

2. SCIENTISTS, PROPONENTS, GRANTEEES, ORGANIZATIONS AND CONTRACTORS NOT VETTED FOR CONFLICTS OF INTEREST.

I have not seen any conflicts of interest statements from any of the parties promoting the rodenticide project. Typically conflicts of interest statements are used to protect scientific integrity and the public's interest in an open and sound scientific process. Scientific journals such as Science and Nature are keenly aware of this problem globally where principles of ethical research and funding are commonly violated. Even after the peer review process corrections and retractions appear constantly in leading journals.

This is even more important where no-bid or single-source contracts are awarded with insufficient public scrutiny and accountability. What, for example, if the project fails or causes substantial harm? Where is the liability? Who will be held accountable? How will short and long-term damages be mitigated? Who pays? What recourse does the general public or the government agencies have to pursue redress for damages? What laws or statutes define penalties for either civil or criminal negligence or misconduct?

THEREFORE, I formally request that all participants, suppliers, contractors be thoroughly vetted in a public document prior to any further considerations by the Coastal Commission or other public agencies with jurisdiction.

3. MORE HUMANE AND EFFECTIVE MEANS ARE WITHIN REACH OF CURRENT TECHNOLOGY.

I firmly believe and assert that methods and technologies for the humane removal of the mouse colonies on the Farallones Islands are likely to be available or feasible in the near future. The introduction of agents or methods that reduce or eliminate the fertility of the target species must be seen as a more viable and humane method. Similarly, mechanical means of dispersing or scaring non-target species from the poison drop areas seem comical if not unrealistic and highly problematical, environmental impacts notwithstanding.

THEREFORE, I strongly recommend that the application be rejected until such fertility reduction methods are developed, not only for the sake of the endangered Petrels, but for the compelling global need to permanently abandon the use of broadly toxic chemicals in a world where species extinctions are now commonplace.

Sincerely,

Tom Yarish
yarishwt@gmail.com
4 May 2021

From: [Jennifer Parlette](#)
To: [Farallon Islands Consistency](#)
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Monday, April 26, 2021 7:16:59 PM

Dear Commissioner:

I am writing to request that you reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan.

Thank you
Jennifer Parlette
14 Rutherford
San Anselmo ca 94960

Sent from my iPhone

From: [Rodger Jacobsen](#)
To: [Farallon Islands Consistency](#)
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Monday, April 26, 2021 1:12:49 PM

Dear Commissioner:

I am writing to request that you poison the 60,000 mice a much bigger threat too wildlife on the islands than the poison cure. Go with staff recommendations, don't listen to the environmental zealots, if they had their way nothing would ever happen. They haven't come up with an alternative that works. We need practical solutions that work, not ideals that don't.

Rodger Jacobsen

1751 Mission Avenue.
San Rafael, 94901

From: [Susan Bradford](#)
To: [Farallon Islands Consistency](#)
Subject: Deny Poison Drop On Farallones Sanctuary
Date: Friday, April 23, 2021 8:35:45 PM

Dear Commissioner:

I am writing to adamantly demand that you reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan.

As you know, this proposal targets the middle of a treasured State Marine Reserve and would also be right in the midst of our longstanding National Marine Sanctuary within whose waters such activities are expressly precluded.

Sanctuary regulations even ban pollutants that "enter and injure" sanctuary resources from outside of the boundary of the sanctuary.

As a constituent and admirer of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I must ask that you deny the requested consistency finding for item W14a.

It remains incumbent on the Wildlife Service to find a more targeted and environmentally benign single-species approach at the Farallones, one less dependent on persistent food-chain poisons that have a known record of killing animals that are not part of the problem.

Responsible stewardship of America's public trust living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach.

Please reject consistency for item W14a, since to do otherwise would set a terrible precedent for both the Commission and for our Sanctuary waters. Thank you very much.

Susan Bradford

Marquard Ave

San Rafael Ca 94901

From: [Jay Sheets](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands Eradication Project
Date: Sunday, November 7, 2021 1:46:19 PM

The Use of Brodifacoum on the Farallones Island

This will be a two-part episode on why the United States Fish and Wildlife Service (USFWS) should or should not move Burrowing Owls off of the Farallon islands and why or why not they should drop 1.5 tons of Brodifacoum onto the island to eradicate the rodents.

First of all, we are dealing with two species of birds - Ashy Petrels and Burrowing Owls. Both are listed on USFWS's list of being a species of special concern. Both species number around the 10,000 in population according to USFWS website.

The BUOW's however, of the 8-12 visiting migrating Owls documented by USFWS and eat primary mice, can sometimes go down the path of least resistance and pick off one of the Ashy Petrels chicks. This is not a good thing. Since they are both on the special birds list, I do believe that the Ashy Petrels should be the primary underdogs in this case. The Ashy Petrels should be left on the island, whereas the BUOW's can be trapped and taken to local rehab groups that have flight cages available such as Wildcare, Lindsay Museum, or even to a nesting spot in Placer County.

Now for the more complex problem. How can we deal with so many rats on the island, and 60,000 mice? Why not have an island that is more bird friendly than ever before for birds that fly thousands of migrating miles and save some of the population for the birds to feed on?

There are new ways to bring down populations of mice and rats by using new bait boxes and new products such as Contrapest and are non-lethal. They are on the market now and waiting to be tested for homeowners. It is rat and mouse birth control. New companies are claiming that the rats and mice will grow infertile for 2-6 months after taking the product for one month. Rats live only 1-2 years so you would seemingly be able to control the populations that way.

There are many ways to fail on this project of poisoning but I do believe that you haven't done everything you could do without poison. Are you 100% sure that no rats or mice on the Farallons won't be immune to Brodifacoum? One pregnant rat or mouse in a nook or cranny can be where a rat can store food and the population will again multiply.

I will leave you now with one of the 30% failures of poisoning which you might or might not have thought of already but I'll put them in quotes so you can ponder over just another way to fail just as Henderson Island did.

Published in the Royal Society of Open Science in April, 2016:

[The Royal Society Publishing](#)

“Our genetic results show that the eradication attempt was very nearly successful, and the brodifacoum tests provide no evidence of resistance to the toxicant used. The genetic results also argue against any re-introduction which is in any case highly unlikely given our knowledge of inter-island boat movements. It appears then that failure was caused neither by a tiny number of survivors nor by several hundred survivors, the latter indicating some systematic fault in the baiting approach used. Rather, the failure could have been due to a small number of rats either not encountering poison pellets or showing a preference for natural food over bait pellets. In tropical or subtropical latitudes, it may always be more difficult than in temperate latitudes to ensure that operations are undertaken when the availability of natural food is very low [31], especially when critical ‘postpone or proceed’ decisions have of necessity to be taken months before the operation. Further plant phenological studies that enhance understanding of the ebb and flow of natural food on Henderson would be useful [32]. Arguably even more useful and of widespread value to other projects would be work directed towards increasing the attractiveness of bait pellets over natural food [33].”

Thank you for your time
Jay Sheets

From: [Jay Sheets](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands Recovery Plans
Date: Monday, October 18, 2021 1:50:13 PM

First of all I'd like to thank the U.S. Fish and Wildlife Service for all of the good projects they have done and sponsored but I just cannot get behind the use of poisons in an eradication project of mice and rats as being one of them. Here are some of the reasons that I feel this way.

- Island poisoning is not new. Of the 200 islands that this has been done on, at least 30 have not worked. One even ended with 46 dead Bald Eagles killed by poisoning from the U.S. Fish and Wildlife Service. This is way too much of an unsuccessful rate for eradication. It must be a 100% kill rate. 99% eradication and will not work either because a couple of rats or a couple of mice can slip back in again. I also believe that they could hide in cracks and surfaces on the sides of the island rocks because of the high populations they would take the lesser holes and move to the sides of the cliffs. It is only an estimate of how many rodents there really are, 60,000 or maybe much more. Would you be able to get the pellets into the sides of the cliffs?
- To be TENDERS of a population I would have to believe in stages with controlling mouse and rat populations. I would also believe that having people hazing, props, lazars, noise makers etc. would only make the mice and rats hunker down and dig into holes and crevasses making it harder for USFWS. I've seen this behavior of older parent rats watching the young hungry rats go into electronic traps and snap traps and could soon learn not to go near these objects. Rats are very smart and that's a lot of territory to go ALL IN on. For USFWS, it's not a smart move.
- Controlling a population would be a better means and California has always been a leader in programs that are beneficial to all. Senestech for rats has been proven to work and the EPA is in the process of approving it for mice yet USFWS is not trying new technology and taking up the blow it up approach. Why take the risk?
- The timing of this eradication process would come in the middle of a 35,000 Hawk & Turkey Vulture migration at Hawk Hill with the GGRO Hawk watchers, counters banders and a public onlookers. Also with many other sea birds coming into the vicinity it is highly populated. Migration for birds aren't for the weak and feeble and since there is a high number of hawks and Owls that will succumb to the long trips will be logged into the 60% of these birds not making it in their first year.
- As far as the Burrowing Owls vs. Ashy Petrels each have a population of around 10,000 and it's a big deal to save the Ashy Petrels? Birds will be birds, Hawks will be hawks, and Owls will be Owls. Our Peregrine falcons have been going into Greenland and chasing the smaller Tundra Peregrine Falcons and larger Gyrfalcons out into other territories because they like it better and are willing to fight for it. The warming of Northern Greenland had now made it a more comfortable temperature. Barred Owls have been migrating to the West coast and chasing Spotted Owls out and

mating and/or killing the Spotted Owls and creating a Spotted X category. This is all bird behavior. I've also heard of relocation plans by humans moving birds out of Southern California to Northern California to relocate and they came back. Small mistake which takes me to the next point.

- Seems there are always some projects that might go awry like the project in Blyth with the heating produced with garage size mirrors to heat the river waters that flow into the 200 foot high tanks. Everything around these areas is dead. Birds flying into the area where the heat from the mirrors suddenly catch them on fire, and fall to the earth. They are called Smokers. They do produce enough electricity for Bakersfield though. USFWS would soon have a very poor reputation, and deservedly so I might add.
- Sharks and fish could also be affected by the poisoning of the Farallon Islands. Some dead bodies will be blown into the Ocean and eaten by sharks and other predators. How many of our underwater wildlife will be affected? Impossible to tell but some fish will die and be washed to shore, along with pellets.
- What will happen next year? Migrating birds will be coming through and then leaving because there is no food to sustain them for the rest of their migration. The migrating birds are the ones that have the best chance of survival but it certainly is not helping them out by losing a place that they have been hard wired into their food chain and route planning. Maybe the Burrowing Owls will skip the Farallons and go out to Livermore where there were a lot of mice but only to be cut down by a windmill. Only trick is on last counts the BUOW population was in the high numbers of fatalities. It was enlightening to see a lower number of fatalities of Burrowing Owls because of the new windmill but if they were to go to the Altamont then USFWS should know that this is their responsibility.
- What I would propose is this if feasible: A 5 year plan to trap and remove the Ashley Storm Petrels that migrate to the Farallon Islands and bring them to the Channel Islands or any other appropriate Island that has already been poisoned and has passed the 10 year healing process. Their nesting areas could be in crevices with appropriate space and protection from raptors and an opening for the male that would be feeding. Monitoring could be done in case of lack of food or disappearance on the male's part.
- During this trial time the Farallon Islands could be using Senestech to take the population of the rat's downs and find the best usage in application and the other new product for the mice to start when it gets approved. Hopefully something like this plan could work and make good use out of both islands.

Thank you for your time and please think beyond old ways and into the new ideas of technology

Jay Sheets

<https://discoverwildcare.org/rat-poison-rodenticides-farallon-islands>

<https://www.nzgeo.com/stories/eradication-the-clearance-of-campbell-island>

<https://www.parksconservancy.org/programs/daily-hawk-count>

<https://senestech.com>

www.brightsourceenergy.com/ivanpah

[https://efiling.energy.ca.gov/Lists/DocketLog.aspx?
docketnumber=09-AFC-06C](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=09-AFC-06C)

<https://goldengateaudubon.org/blog-posts/good-news-for-birds-at-the-altamont-wind-farm/>

Peregrine Wars

<https://www.theatlantic.com/science/archive/2017/..>

Jul 24, 2017 · Burnham estimated that a peregrine from northern Greenland migrates more than 8,000 miles south, to Costa Rica, Panama, or Venezuela.

ERADICATION OF BLACK RATS FROM ANACAPA ISLAND: BIOLOGICAL AND SOCIAL CONSIDERATIONS

From: [Steve Centanni](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands
Date: Friday, October 22, 2021 2:09:43 PM

I understand there is a way to control the mice without dropping poison. Please follow that course.

Please do NOT introduce poison into such a pristine and precious environment. This is a marine sanctuary, and should be treated with the utmost respect. I am adamantly opposed to the plan for dropping poison.

Thanks for protecting our islands!

Steve Centanni

(California citizen for 75 years)

From: [Linda Rude](#)
To: [Farallon Islands Consistency](#)
Subject: Farallones issue
Date: Tuesday, November 2, 2021 12:25:28 PM

NO POISON DROP PLEASE!!!

Poison is not the solution. It spreads contaminating the environment and killing other species. The Island needs a natural predator. Maybe Bob Cats, Owls, or other appropriate natural predators. More imagination here please and less killing. Think food chain. Remember the recent Elk disaster in Point Reyes?

[Sent from Yahoo Mail on Android](#)

From: ExecutiveStaff@Coastal
To: Energy@Coastal
Subject: FW: Hello from the Contact Page :NO POISON DROP
Date: Tuesday, October 5, 2021 12:52:06 PM

Fyi -

From: Greg E. <greg1sd@gmail.com>
Sent: Sunday, October 3, 2021 9:23 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Hello from the Contact Page :NO POISON DROP

Project Name and Application Number: Rat Eradication PLan

Full Name: Gregory Ervice

Email: greg1sd@gmail.com

On Behalf Of: Myself

Comments:

I just finished reading an article in the Sept, 2021, issue of the Sonoma County Gazette concerning a USFWS plan to drop poison to eradicate rats On the Farallones Islands.

I am aghast and hope this plan neve comes to fruition, especially since AB 1788 bans the use of the poison proposed.

Sincerely,

Gregory Ervice
Santa Rosa, CA

Public comments submitted to the Coastal Commission are public records that may be disclosed to members of the public or posted on the Coastal Commission's website. Do not include information, including personal contact information, in comments submitted to the Coastal Commission that you do not wish to be made public. Any written materials, including email, that are sent to commissioners regarding matters pending before the Commission must also be sent to Commission staff at the same time.

From: [Krygsman, Vail@Coastal](mailto:Krygsman_Vail@Coastal)
To: [Farallon Islands Consistency](mailto:Farallon_Islands_Consistency)
Subject: FW: Hello from the Contact Page
Date: Monday, November 15, 2021 9:06:07 AM

From: Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>
Sent: Sunday, November 14, 2021 3:00 PM
To: Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>; Krygsman, Vail@Coastal <vail.krygsman@coastal.ca.gov>
Subject: Fwd: Hello from the Contact Page

Get [Outlook for iOS](#)

From: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Sent: Friday, November 12, 2021 2:26:09 PM
To: Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>
Subject: FW: Hello from the Contact Page

Hi Kate

I think this is for Energy.

Thank you

Maria Elena Marquez

-----Original Message-----

From: Susan Bradford <sbradford@sonic.net>
Sent: Friday, November 12, 2021 1:48 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Hello from the Contact Page

Project Name and Application Number: U.S. Fish & Wildlife's proposed helicopter dispersal of over 1.5 metric tons of rat poison bait pellets in the Greater Farallones National Marine Sanctuary

Nature of Communication (In Person, Telephone, Other): email

Date and Time Requested: Nov 12,2021 @ 1:46pm

Full Name: Susan Bradford

Email: sbradford@sonic.net

On Behalf Of: The planet, the earth, the ocean, the wildlife, humans.

Comments:

STOP the U.S. Fish & Wildlife's proposed helicopter dispersal of over 1.5 metric tons of rat poison bait pellets in the Greater Farallones National Marine Sanctuary!!!!!!!!!!!!

DO NOT ALLOW the U.S. Fish & Wildlife them to be allowed to proceed with helicopter drops of over 3306 pounds of one of the most deadly pesticides (brodifacoum) known to wildlife since DDT.

This is absolute idiocy... unless they are trying to kill off every living thing for miles and miles around ! Stop them!PLEASE!

Public comments submitted to the Coastal Commission are public records that may be disclosed to members of the public or posted on the Coastal Commission's website. Do not include information, including personal contact information, in comments submitted to the Coastal Commission that you do not wish to be made public. Any written materials, including email, that are sent to commissioners regarding matters pending before the Commission must also be sent to Commission staff at the same time.

From: [Barrera, Alexis@Coastal](mailto:Barrera,Alexis@Coastal)
To: [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)
Cc: [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal)
Subject: FW: Rejecting the USFWS Poison Dispersal Plan
Date: Monday, October 4, 2021 11:45:35 AM

Hi you two, forwarding this email from a member of the public regarding the Farallon's CD.

From: Melissa Warfield <melissawarfield@yahoo.com>
Sent: Monday, October 4, 2021 11:42 AM
To: Barrera, Alexis@Coastal <Alexis.Barrera@coastal.ca.gov>
Cc: cary.batha@coastal.ca.gov; Cuffe, Kelly@Coastal <Kelly.Cuffe@coastal.ca.gov>; Ducklow, Kelsey@Coastal <Kelsey.Ducklow@coastal.ca.gov>; Marquis, Christopher@Coastal <christopher.marquis@coastal.ca.gov>; Mary.Metella@coastal.ca.gov
Subject: Rejecting the USFWS Poison Dispersal Plan

Dear Environmental Scientists,

This letter is for Senior Environmental Scientist, John Weber. I did not see his name listed on the Contact Districts & Programs listings. But I did see your name. I am hoping this letter has gone to the right person on the issues of rejecting the USFWS poison dispersal plan. If not, please send to the appropriate person if I missed their name on the listing.

Please reject the USFWS poison dispersal plan for the Southeast Farallon Island. Please explore non-toxic contraceptive but as a solution. Better yet let Mother Nature take over.

Owls are natural predators to mice. It's cruel and unethical to mass poison living animals. Poisoning is a painful way to die. Death takes days for each animal. The animals will slowly succumb to dehydration and internal bleeding.

Airdropping 1.3 metric tons of rodenticide is not a targeted solution. This poison is dangerous to every living creature. The dumping of poison takes place on Southeast Farallon Island off the coast of San Francisco.

Please consider my idea of using a non-toxic contraceptive or just letting the owls take care of the mice problems on Farallon Island.

I would like to hear from the environmental scientists listed up above on this issue.

Thank you.

Sincerely,
Melissa Warfield
20991 Chippendale Avenue West
Apartment 16
Farmington MN 55024-9682
melissawarfield@yahoo.com

From: [claudia](#)
To: [Farallon Islands Consistency](#)
Subject: immediate gratification
Date: Thursday, August 12, 2021 6:17:38 PM

Dear Representative for our planet...

Australia is having a mouse plague and they are planning on using an anticoagulant just like you.

I think the anticoagulant is favored by some is because it gives immediate gratification.

AN ANTICOAGULANT WILL GIVE IMMEDIATE GRATIFICATION,
however,
IT CAN AND WILL CAUSE COLLATERAL DAMAGE TO THE ECOSYSTEM.

FERTILITY CONTROL WILL NOT GIVE IMMEDIATE GRATIFICATION,
but,
IT WILL NOT CAUSE COLLATERAL DAMAGE TO THE ECOSYSTEM,

I think the question you need to ask yourselves is...
ARE YOU SERVING OUR PLANET AND ITS ECOSYSTEMS
OR
ARE YOU SERVING YOUR NEED TO BE INSTANTLY GRATIFIED?

In the wild mice live up to 4 to 6 months, is that too long to safely wait for the mice to be eliminated?

Thank you,
Claudia Rannikar

From: [Annemarie O'Toole](#)
To: [Farallon Islands Consistency](#)
Date: Thursday, April 8, 2021 5:20:38 PM

Please do not permit the U.S. Fish and Wildlife Service to use helicopters to scatter 1.5 tons of cereal bait onto the Southeast Farallon Island to try to keep eight to ten Burrowing Owls from coming to the island from the Marin Headlands to eat mice that live there. There are other methods that would not be harmful to all wildlife there. Annemarie O'Toole Dippre

From: [Michelle Irwin](#)
To: [Farallon Islands Consistency](#)
Subject: No Poison Drop on the Farallon Islands!!!!
Date: Wednesday, August 25, 2021 9:42:20 PM

Please reconsider this mis-guided plan. Ecosystems are so sensitive... Where are the intelligent people in this proposal?

Other options are available if the research is done!!!! One and a half tons of rodenticide affects the entire habitat of the Farallones and surrounding waters.

Let's reject this nightmare of a solution... Let's find smart and ecologically sound remedies.

Sincerely
Michelle K Irwin
Jenner, CA 95450

From: [Wendy Krupnick](#)
To: [Farallon Islands Consistency](#)
Subject: No Poison Drops
Date: Sunday, September 5, 2021 1:14:28 PM

Dear Coastal Commissioners,

Please DO NOT implement areal poison drops at the Farallon Islands. This would do extensive harm to the ecosystem and would not solve the problem. Contraception for the mice is a far better solution.

Thank you for considering these comments.

Wendy Krupnick

4993 B. Occidental Rd. Santa Rosa, 95401

From: wink2020@comcast.net
To: [Farallon Islands Consistency](#)
Subject: No poison on the Farallon Islands please!
Date: Tuesday, July 27, 2021 4:37:41 PM

Dear Sir or Madame,

Good afternoon. It has been brought to my attention that the U.S. Fish and Wildlife Service has a plan to exterminate mice from the South Farallon Islands by dropping from a helicopter nearly 1.5 tons of pellets laced with a potent and controversial rat poison called brodifacoum — enough to kill every last mouse. Non target species and predators will consume the pellets and mice, and they too will be poisoned and die.

I am not a biologist or scientist, but isn't there a safer/better way to deal with the mice infestation?

Diane Winkler
510-530-8858

From: [Poison Free Malibu](#)
To: [Farallon Islands Consistency](#)
Subject: POISON FREE FARALLON
Date: Friday, November 19, 2021 8:09:02 AM

Dear Commissioners,

We would like to request that you REJECT the request for a consistency determination on the pending US Fish and Wildlife Service poison dispersal plan for Southeast Farallon Island.

What's being allowed to take place in conservation circles is WRONG.

The proposal recommends **killing** and **poisoning** sentient beings with painful poisons, and contaminating the environment as we intervene in complex trophic cascades to "save" Nature from itself.

Poison keeps poisoning - poisoning non-target wildlife, breaking down into the ecosystem, and eventually poisoning us!

Whether directly or indirectly, we will not survive ignorance on the part of our policymakers, regulators, and the corporate interests of Big Ag and Big Pesticide who influence them.

The environment and wildlife need to be protected, not the pesticide industry profits and industry-"advised" grant funding.

The proposal targets the middle of a State Marine Reserve using a known deadly poison.

Pesticide industry stakeholders have been a central source of advice for the government agencies for the handling of invasives from the beginning.

Unfortunately, they have inserted themselves into the funding committees and spend much money sponsoring the academics

who buttress their claims, therefore influencing a disturbing amount of decision making on how this is done.

It's a travesty of governance and independence lost.
Major conflicts of interest rule this roost.

Please reject this item - it would set a terrible precedent for the Sanctuary waters and elsewhere.

Thank you for your moral compass and ethical support.

Kian

Kian Schulman RN, MSN
Director, Poison Free Malibu
[Email: PoisonFreeMalibu@gmail.com](mailto:PoisonFreeMalibu@gmail.com)
Websites: PoisonFreeMalibu.org
Facebook: Poison Free Malibu
Phone: 310-456-0654

poison f r e e Malibu



From: [Lisa Marie Alley](#)
To: [creek shade](#); californianature@resources.ca.gov; [Farallon Islands Consistency](#)
Subject: RE: Comments Regarding the 30x30 initiative: US Fish and Wildlife Commission utilizing rodenticide drop - Farallones
Date: Tuesday, November 9, 2021 8:05:59 PM
Attachments: [image001.png](#)

Coalition Members,

Thank you for your comments related to the Draft Natural and Working Lands Climate Smart Strategy.

The State is reviewing all comments received as they work to finalize the strategy.

Thanks – Lisa Marie
Outreach Team

From: creek shade <creekshade@gmail.com>
Sent: Tuesday, November 9, 2021 4:26 PM
To: californianature@resources.ca.gov; FarallonIslands@coastal.ca.gov
Subject: Comments Regarding the 30x30 initiative: US Fish and Wildlife Commission utilizing rodenticide drop - Farallones

Respected Biologists and Managers,

Our understanding is that you are considering the use of toxic rodenticide drops over the Farallones.

We would like to draw your attention to a 2-year risk assessment study examining the toxic effects of rodenticides on non-target animals including raptors. The study used ecological risk assessment calculations based on previously established toxicity data, and included a wide variety of commonly used rodenticides including diphacinone, imidacloprid and zinc phosphide. Please note that brodifacoum, which has been used in the past, is a rodenticide in the same anticoagulant family as diphacinone. Imidacloprid is sometimes blended into the anticoagulant rodenticides and is also extremely toxic to non-target receptors including native birds (Mineau and Palmer 2013).

As the name indicates, anticoagulant rodenticides cause animals to bleed internally. Causes of mortality are internal hemorrhaging and related toxicity effects (McMillin 2017); non-target wildlife is definitely impacted (Lima and Salmon 2010; Hosea 2000; US EPA 1998a). Significant toxic impacts have been observed on screech owls, great-horned owls and golden eagles. These previously obtained toxicity studies indicate negative impacts are anticipated for burrowing owls and other native birds.

The study concluded that rodenticide drops would have heavy impacts on non-target wildlife including protected and sensitive species. Furthermore, many rodenticides can persist, which can result in exposure over longer terms.

Please consider our note as a strong recommendation against pesticide drops on the Farallon Islands. We cannot afford to lose more wildlife. Please consider using non-toxic rodent removal options, if at all, or benign neglect.

Multiple other references and our exposure dose calculations are available if desired.

Best regards,

Maya Khosla, Wildlife Biologist and Toxicologist

Stephanie Lennox, Envirichment

amran Nayeri, Ph.D. Editor: Our Place in the World: A Journal of Socialism

Veronica Jacobi, OurGreenChallenge.org

Nick Thayer, high school biology teacher

Ariane Eroy, Ph.D

Christine Hoex

Jenny Blaker

Larry Hanson, President, California River Watch, www.criverwatch.org

Selected References

Hosea, R. 2000. Exposure of Non-Target Wildlife to Anticoagulant Target Wildlife to Anticoagulant Rodenticides in California. Proceedings of the 19th Vertebrate Pest Conference.

Lima L. and T. Salmon. 2010. Assessing some potential environmental impacts from agricultural anticoagulant uses. Proceedings of the 24th Vertebrate Pest Conference. Proceedings of Vertebrate Pest Conference. University of California Davis. 199-203.

McMillin, S. 2017. Conference Paper: Impacts to non-target wildlife from rodenticide use in urban areas. Urban Wildlife Conference. June 7.

Mineau, P. and C. Palmer. 2013. The Impact of the Nation's Most Widely Used Insecticides on Birds. American Bird Conservancy Report.

US EPA.1991. Reregistration Eligibility Decision (RED): Rodenticide Cluster. EPA 738-F-98-004.

From: [Terri Moon](#)
To: californianature@resources.ca.gov
Cc: [Farallon Islands Consistency](#)
Subject: Rodenticides on Farrallones Islands
Date: Sunday, October 24, 2021 8:28:43 PM
Attachments: [image.png](#)

To whom it may concern,

I want to draw your attention to several studies that show that your idea to drop rodenticide over the Farrallones Islands is an idea that will cause more harm than good. Furthermore, I urge you to cancel these plans immediately!

My friend, Maya Khosla, a Wildlife Biologist and Toxicologist performed a study using ecological risk assessment calculations based on previously established toxicity data, and included a wide variety of commonly used rodenticides including diphacinone, imidacloprid and zinc phosphide. This team of researchers has asked you to note that brodifacoum, which has been used in the past, is a rodenticide in the same anticoagulant family as diphacinone. Imidacloprid is sometimes blended into the anticoagulant rodenticides and is also extremely toxic to non-target receptors including native birds (Mineau and Palmer 2013).

As the name indicates, anticoagulant rodenticides cause animals to bleed internally. Causes of mortality are internal hemorrhaging and related toxicity effects (McMillin 2017); non-target wildlife is definitely impacted (Lima and Salmon 2010; Hosea 2000; US EPA 1998a). Significant toxic impacts have been observed on screech owls, great-horned owls and golden eagles. These previously obtained toxicity studies indicate negative impacts are anticipated for burrowing owls and other native birds.

According to this research study, "rodenticide drops would have heavy impacts on non-target wildlife including protected and sensitive species. Furthermore, many rodenticides can persist, which can result in exposure over longer terms".

Researchers in this study implore you to "consider my note as a strong recommendation against pesticide drops on the Farallon Islands. We cannot afford to lose more wildlife. Please consider using non-toxic rodent removal options, if at all, or benign neglect."

These researchers provide multiple other references and exposure dose calculations in the citations below, as well as a graphic of the studies results, for your consideration and review:
Selected References

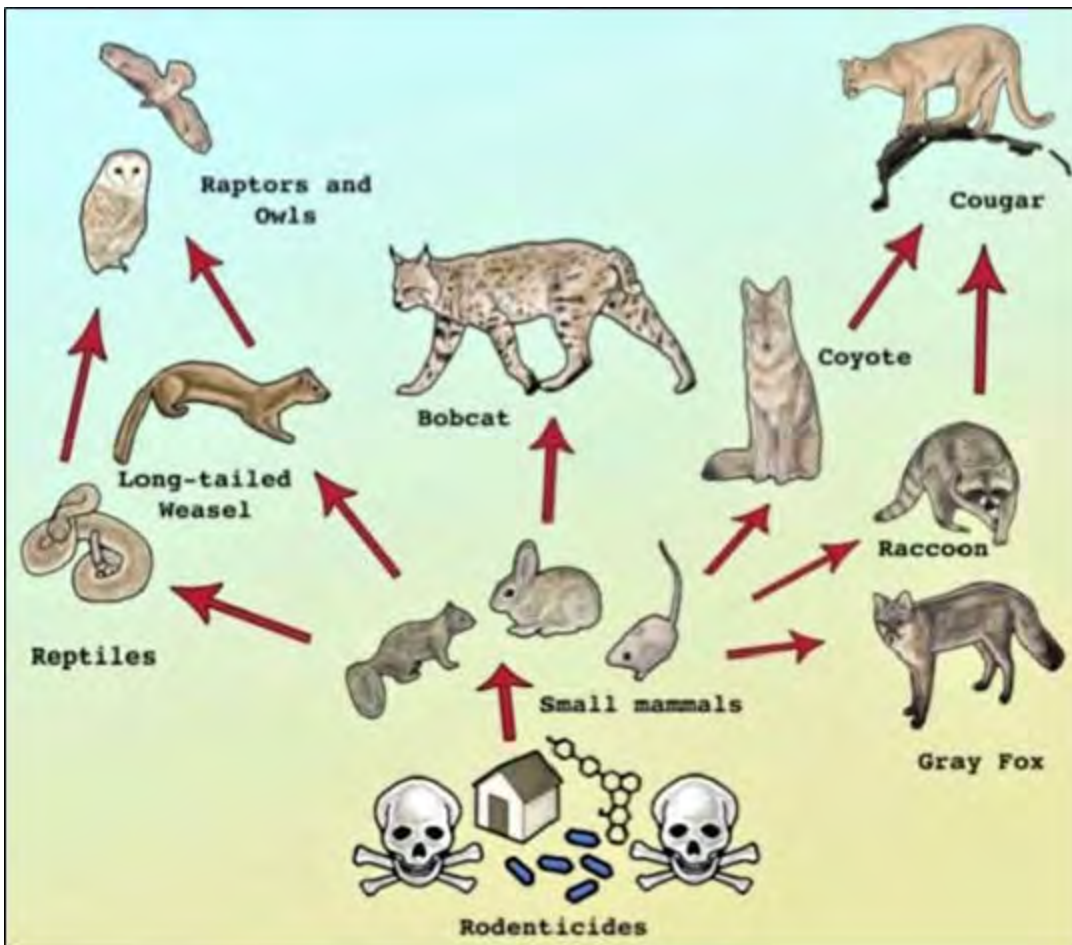
Hosea, R. 2000. Exposure of Non-Target Wildlife to Anticoagulant Target Wildlife to Anticoagulant Rodenticides in California. Proceedings of the 19th Vertebrate Pest Conference.

Lima L. and T. Salmon. 2010. Assessing some potential environmental impacts from agricultural anticoagulant uses. Proceedings of the 24th Vertebrate Pest Conference. Proceedings of Vertebrate Pest Conference. University of California Davis. 199-203.

McMillin, S. 2017. Conference Paper: Impacts to non-target wildlife from rodenticide use in urban areas. Urban Wildlife Conference. June 7.

Mineau, P. and C. Palmer. 2013. The Impact of the Nation's Most Widely Used Insecticides on Birds. American Bird Conservancy Report.

US EPA.1991. Reregistration Eligibility Decision (RED): Rodenticide Cluster. EPA 738-F-98-004.



Sincerely,
Terri Moon

Terri Moon, MS
Mediation, Empathy & Heart-Based Communication (NVC) Trainings
Distance healings, re-programming of core beliefs & fears and Young Living Essential Oils
Mentor
WomanSpeak Public Speaking Practice Circle Facilitator
www.TerriMoon.com, 707-709-8574 (home/office), 707-591-1872 (cell/text)

From: [Amy Smith](#)
To: [Farallon Islands Consistency](#)
Subject: Stop poison drop at the Farallon Islands CA!
Date: Monday, July 26, 2021 9:34:37 AM
Importance: High

- **Stop poison drop at the Farallon Islands!**
- **Because the composition of the Advisory Panel that wrote this document is in question. T**
- **The only person who represents marine conservation reveals in his bio that he is the founder of *Island Conservation*, which is an organization that is conducting island mammal eradications all over the world.**
- **At the Farallon Islands, alone, his company's project proposes to aerial bomb 1.5 tons of rodenticide, which--if allowed to proceed-- would inevitably contaminate the surrounding waters around the Islands. It**
- **is important to recognize that the Farallon Islands are the largest bird sanctuary in the lower 48 States.**
- **In fact, *Island Conservation* published a document in 2018 that has already identified many other specific islands on the coast of California for similar projects.**
- **Stop poison drop at the Farallon Islands!**
- **Thank you!**

Amy Smith

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From: [Ian Altman](#)
To: [Farallon Islands Consistency](#)
Subject: support for farallon island mouse eradication project
Date: Wednesday, October 6, 2021 1:42:12 PM

I wish to express my full support of the proposed plan to eradicate mice at the Farallon Island research station. I urge you to approve the existing proposal to eradicate the mice present at the earliest possible moment.

Ian Altman
Tiburon, CA

From: [John Ungar](#)
To: [Farallon Islands Consistency](#)
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Tuesday, November 23, 2021 5:06:46 PM

Dear Commissioners,

I request that you approve the US Fish and Wildlife Service's plan to eradicate mice on the Farallon Islands. The proposed method of eradication has been successfully used dozens of times, including in California.

The mice are having a devastating affect on the island's ecosystem. They must be removed.

Please follow the well-established science and approve the total elimination of the mouse population on the Farallons.

Thank you,

John F. Ungar

From: [Monica Udvardy](#)
To: [Farallon Islands Consistency](#)
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Tuesday, November 23, 2021 5:02:54 PM

Dear Commissioners,

I am the daughter of ornithologist, MDF Udvardy, who conducted research on the avifauna of the Farallon islands in the 1960s and 1970s and also served on the board of Point Blue (then Point Reyes Bird Observatory). I know how supportive he would have been of Point Blue's request that you concur with your own staff's recommendation and approve the upcoming request for a consistency determination for the US Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands.

The introduction of invasive, non-native house mice to the Farallon Islands has caused significant disturbance to the islands' sensitive ecosystem. The house mice have direct and indirect harmful impacts on the islands' breeding seabirds, especially ash storm-petrels, but also on Leach's storm-petrels, as well as on native salamanders, crickets and other invertebrates, and native plants.

The only way to allow the ecosystem to recover is to ensure 100% eradication of the house mice. The survival of even a single pair of mice jeopardizes the whole project, as the mouse population can recover incredibly quickly.

At present, there is only one known method that has proven effective for island eradications, and that is the "preferred alternative" (an aerial broadcast of the rodenticide Brodifacoum) identified by the US Fish and Wildlife Service in the Final Environmental Impact Statement published in March 2019.

Thank you for your consideration and for following the best available science when making your decision.

Sincerely,

Monica Udvardy

From: [Mark Mushkat](#)
To: [Farallon Islands Consistency](#)
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Tuesday, November 23, 2021 4:12:10 PM

Dear Commissioners,

I am writing to request that you concur with your own staff's recommendation and approve the upcoming request for a consistency determination for the US Fish and Wildlife Service's plan to remove invasive house mice from the Farallon.

At present, there is only one known method that has proven effective for island eradications, and that is the "preferred alternative" (an aerial broadcast of the rodenticide Brodifacoum) identified by the US Fish and Wildlife Service in the Final Environmental Impact Statement published in March 2019.

Thank you for your consideration and for following the best available science when making your decision.

Sincerely,

Mark Mushkat
Volunteer Birding Guide

From: [Edward Clapp](#)
To: [Farallon Islands Consistency](#)
Subject: A consenting voice on mouse eradication
Date: Wednesday, May 5, 2021 4:44:03 PM

I recently received an email urging me to stop "the criminals from U.S. Fish and Wildlife services" from using a rodenticide to eradicate mice from the Farallons. There were a number of other appeals to emotion but facts were lacking.

Troubled, I posed the person sending me the plea to sign this petition the following questions: 1) do the mice need to be eradicated even if poison is used; and 2) are there other methods that would be effective but would be less damaging and, if so, can you point to a reliable and preferably peer-reviewed reference?

There was no response to either question but I was warned not to eat locally caught fish for a while.

Given that level of intellectual integrity and having briefly looked at "Consistency Determination No CD-0006-21.pdf", which does discuss alternatives, it seems there are no viable alternatives despite the clear though short term damage a rodenticide application will inflict.

Sadly,

Edward Clapp

From: [JUDITH IAM](#)
To: [Farallon Islands Consistency](#)
Subject: Against Toxic Rodenticide Drops on Farallones
Date: Sunday, April 25, 2021 12:51:29 PM
Attachments: [image.png](#)

Farallones Biologists and Managers:

Despite continued protest, I understand that you wish to pursue the brutal use of toxic rodenticide drops on the Farallones.

Below, from a colleague, is ample basis for ceasing at once. I await your response.

Thank you, Judith Iam

I would like to draw your attention to a 2-year risk assessment study examining the toxic effects of rodenticides on non-target animals including raptors. Our study used ecological risk assessment calculations based on previously established toxicity data, and included a wide variety of commonly used rodenticides including diphacinone, imidacloprid and zinc phosphide. Please note that brodifacoum, which has been used in the past, is a rodenticide in the same anticoagulant family as diphacinone. Imidacloprid is sometimes blended into the anticoagulant rodenticides and is also extremely toxic to non-target receptors including native birds (Mineau and Palmer 2013).

As the name indicates, anticoagulant rodenticides cause animals to bleed internally. Causes of mortality are internal hemorrhaging and related toxicity effects (McMillin 2017); non-target wildlife is definitely impacted (Lima and Salmon 2010; Hosea 2000; US EPA 1998a). Significant toxic impacts have been observed on screech owls, great-horned owls and golden eagles. These previously obtained toxicity studies indicate negative impacts are anticipated for burrowing owls and other native birds. Our study concluded that rodenticide drops would have heavy impacts on non-target wildlife including protected and sensitive species. Furthermore, many rodenticides can persist, which can result in exposure over longer terms.

Please consider my note as a strong recommendation against pesticide drops on the Farallone Islands. We cannot afford to lose more wildlife. Please consider using non-toxic rodent removal options, if at all, or benign neglect.

Multiple other references and our exposure dose calculations are available if desired.

Best regards,

Maya Khosla

Wildlife Biologist and Toxicologist

Selected References

Hosea, R. 2000. Exposure of Non-Target Wildlife to Anticoagulant Target Wildlife to Anticoagulant Rodenticides in California. Proceedings of the 19th Vertebrate Pest Conference.

Lima L. and T. Salmon. 2010. Assessing some potential environmental impacts from agricultural anticoagulant uses. Proceedings of the 24th Vertebrate Pest Conference. Proceedings of Vertebrate Pest Conference. University of California Davis. 199-203.

McMillin, S. 2017. Conference Paper: Impacts to non-target wildlife from rodenticide use in urban areas. Urban Wildlife Conference. June 7.

Mineau, P. and C. Palmer. 2013. The Impact of the Nation's Most Widely Used Insecticides on Birds. American Bird Conservancy Report.

US EPA.1991. Reregistration Eligibility Decision (RED): Rodenticide Cluster.

From: [LTTB LLC](#)
To: [Farallon Islands Consistency](#)
Subject: California Coastal Commission -- Southeast Farallon Island
Date: Monday, April 19, 2021 4:50:19 PM

We are against the US Fish and Wildlife Service's controversial scheme to use helicopters to scatter 1.5 tons of poisonous cereal bait onto the Southeast Farallon Island off of San Francisco. The poison planned for use amidst the National Marine Sanctuary is the same highly toxic stuff that has been implicated in slowly killing mountain lions, bobcats, raptors, and other non-target wildlife, which recently led to an interim ban on its use on land throughout California. DO NOT DROP POISON AROUND THE FARALLON ISLAND. It will destroy the ecosystem and kill dozens of species, not just the one targeted.

- LTTB LLC

From: [Harmony Art Organic Design](#)
To: [Farallon Islands Consistency](#)
Subject: Cereal bait
Date: Friday, April 9, 2021 2:41:19 PM

PLEASE do NOT permit US Fish and Wildlife to drop poison on the Farallon Islands. There are other less toxic ways to address mice fertility that does NOT poison the rest of our environment so widely and broadly.

This is solving one problem by creating even bigger ones.

PLEASE STOP the toxic poison drop!

Thank you so much!
harmony

harmony joy susalla
po box 892
gualala, ca 95445
707-884-3347

From: [Sandy](#)
To: [Farallon Islands Consistency](#)
Cc: drop19@sonic.net
Subject: Deny Poison Drop On Farallones Sanctuary - This Must Be Stopped.
Date: Sunday, June 6, 2021 9:50:25 PM

Dear Commissioner:

I walk the beaches of San Francisco, less than 30 miles from the Farallones. There are less dangerous and more targeted and species-specific ways to get rid of the mice on the Farallones, **using non-toxic contraceptive baits already being licensed by the EPA, with none of the threats of biomagnification while avoiding the wholesale killing of non-target species.** I am writing to request that you reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan. As you know, this proposal targets the middle of a treasured State Marine Reserve and would also be right in the midst of our longstanding National Marine Sanctuary within whose waters such activities are expressly precluded. Sanctuary regulations even ban pollutants that "enter and injure" sanctuary resources from outside of the boundary of the sanctuary. As a constituent and admirer of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I must ask that you deny the requested consistency finding for item W14a.

It remains incumbent on the Wildlife Service to find a more targeted and environmentally benign single-species approach at the Farallones, one less dependent on persistent food-chain poisons that have a known record of killing animals that are not part of the problem. Responsible stewardship of America's public trust living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach.

Please reject consistency for item W14a, since to do otherwise would set a terrible precedent for both the Commission and for our Sanctuary waters.

Thank you very much.

Name: Sandy Weil

Address: 2083 28th Ave, SF, CA 94116

Email tagline:

Good reminder... "Service is the rent we pay for the privilege of living on this earth." — Shirley Chisholm

From: beneficialbug@sonic.net
To: [Farallon Islands Consistency](#)
Subject: Do Not Use Rat Poison
Date: Thursday, April 22, 2021 10:20:37 AM

To whom it may concern:

Our environment is a polluted mess and dropping rat poison on the Farallong Islands will only pollute the oceans and air more, and negatively affect flora, fauna, and ocean life.

The thinking is so completely outdated, so long known to be wrong. But in an explanation of a basic reason not to drop rat poison if you want to see less rats, we can look at what happens with insecticiding areas to try to get rid of mosquitoes. For decades on our website, we've had a link to an important report detailing the resistance (just like antibiotic resistance) which develops where there is a big kill-off of whatever fauna (or flora) is under attack.

While our website needs to be gone over and updated, we had on it an important report which at the moment is not coming up directly, but here's the title and description from our site:

<<

[Overkill: Why Pesticide Spraying for West Nile Virus May Cause More Harm Than Good](#) Report by Toxic Action Center and Maine Environmental Policy Institute. Includes why spraying is ineffective from an environmental perspective - diminishes the supply of natural mosquito predators. Includes what's wrong with many of the larvicides being proposed.

>>

The point is, this information is very old news. Insecticided areas give rise to resistance so that the strongest specimens survive and reproduce so if the goal is to have less rats, you're shooting yourself in the foot. Raptors who see rats as prey are killed by eating poisoned rats and so you lose Nature's way of keeping some balance in the environment. When I lived in Sonoma, a pesticide hell, by 1998 we had no raptors to speak of in the southern Sonoma Valley and that is likely to have been due to our nearest neighbor wine grape grower, Dale Ricci, who used strychnine as well as herbicides, insecticides, fungicides, and shooting birds; he was addicted to poisoning and control, or a sense of control. He actually told me that he believed he should not lost one grape to a bird, that they were HIS grapes. I guess he never read the bible and the concept of leaving fruit on the vines and food in on the edges of fields to share with those in need.

It's the same with herbicides; you use herbicides on vegetation and more robust vegetation which was not desired is what survives or succeeds what was killed off.

This simply is nature at work. When you create a vacuum, a species tries to fill in. Humans are no exception; when there is a big kill-off, such as with 911, suddenly there were many babies born less than a year later.

Once and for all, we must stop trying to act like Gods and think we can control the world. Humans are but one species on this earth; yet, as a species we have created dramatic, negative changes for many species by our poisonings.

We ask you to watch David Theodoropoulos' presentation and slideshow about Conservation Biology and natural succession. Below, you can find the time stamp for his portion of a tremendously useful program in July, 2015:

VIDEO: [East Bay Hills Forests: Invasive Fire Hazards or Natural Treasures?](#) July 31, 2015, Berkeley, California

Community discussion of the FEMA-funded tree removal projects in the East Bay Hills, from Richmond to

Hayward, which are opposed by 90% of the 13,000 comments on FEMA's Environmental Impact Statement. Watch a fire demonstration by a Firefighter called on by local mayors after the 1991 hills fire, and a slideshow by Conservation Biologist discussing species migration and acclimation throughout history.

(00:19) Host MAXINA VENTURA, Chronic Effects Researcher, East Bay Pesticide

Alert, <http://www.dontspraycalifornia.org/>

(05:14) DAVID THEODOROPOULOS, Conservation Biologist; Author: Invasion Biology - Critique of a Pseudoscience; Slideshow Presentation, <http://dtheo.org/>

(1:09:17) KEN CHEETHAM, Forest Photography; Bay Area Progressive Directory, <http://bapd.org/trees.html>

(1:23:41) DAVID MALONEY, Retired Oakland Fire Department; Chief, Fire Prevention, Oakland Army Base; appointed to 1991 Oakland-Berkeley Mayors' Task Force on Emergency Preparedness and Community Restoration; Fire Demonstration. Read [his 2016 hills fire danger paper](#) for nuts and bolts wildfire info, and [his alternate proposal](#) for the East Bay Hills.

Plus updates from

(1:43:45) DAN GRASSETTI, Hills Conservation Network, <http://hillsconservationnetwork.org/>

(1:55:39) TANYA SMITH, Forest Action Brigade

(1:57:46) JACK GESCHEIDT, TreeSpirit Project <http://treespiritproject.com/>

For more information also check out:

Death of a Million Trees <http://milliontrees.me/>

Save the East Bay Hills <http://www.saveeastbayhills.org/>

Save Mount Sutro Forest <http://sutroforest.com/>

San Francisco Forest Alliance <http://sfforest.org/>

Save Our Dimond Park Trees <https://www.facebook.com/SaveOurDimondParkTrees/>

>>

Stop the poisoning of the earth. Today is called Earth Day and it's hard to believe we need to remind anyone of the need to stop poisoning the Farallon Islands, or anywhere.

Sincerely,

Maxina Ventura

founder and Chronic Effects Researcher,

East Bay Pesticide Alert / Don't Spray California

--

Maxina Ventura
Classical Homeopathy, Non-toxic Medicine
All Ages, All Genders
WiseWomanHealth.com

From: [melissa.mandel](#)
To: [Farallon Islands Consistency](#)
Subject: Don't allow Farallon Islands to be poisoned!
Date: Friday, April 23, 2021 12:44:16 PM

Dear Commission Members:

Do not permit the U.S. Fish and Wildlife Service to use helicopters to scatter 1.5 tons of rodenticide onto the Southeast Farallon Island to try to keep eight to ten Burrowing Owls from coming to the island from the Marin Headlands to eat mice that live there.

Such an act will poison all life on and around the islands. Vote NO on this poison project.

Your job is to protect the coastal region. Vote No on poisons!
Melissa Mandel
Oakland CA

From: [Helene Chalfin](#)
To: [Farallon Islands Consistency](#)
Subject: Don't let USFW poison the Farallon islands with rat/mice poison!
Date: Tuesday, April 13, 2021 7:46:43 AM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. *Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away.

This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,

Helene E. Chalfin
Little River, California

From: [Kraemer Winslow](#)
To: [Farallon Islands Consistency](#)
Subject: Don't Poison the Farallon Islands
Date: Monday, June 7, 2021 6:38:57 PM

Please do not add further strains on our already fragile ecosystems – both on land and in our ocean waters. There are safer (and ultimately likely more effective) ways to remove the mice from the island(s)!

Thank you,
Kraemer Winslow

Kraemer Winslow
Make Your Point - Achieve Your Goals
Make Your Point Communications, Inc.
415.456.9060 Desk Direct
415.713.9060 Mobile
marilynkraemerwinslow Skype
www.MYPcommunications.com

From: [Marty Roberts](#)
To: [Farallon Islands Consistency](#)
Subject: Don't poison the Farallons!!
Date: Friday, June 4, 2021 2:18:39 PM

Dear Coastal protector,

I strongly oppose the US Fish and Wildlife Service's proposal to drop a 2nd generation anticoagulant poison on the Farallon islands, which will clearly also poison our marine sanctuaries as well as infiltrate the food chain and secondarily poison many other species including raptors.

I strongly support protection of our marine sanctuaries, the Farallon Islands ecosystem, and I request the requirement of a different, intelligent, safer approach to address the mouse issue and to protect the Ashy Storm-Petrel as well as many other species on and around the Farallon Islands. Please use a multifaceted alternative, proactive, low risk, longer and safer approach to eliminate the mouse population.

Please do not do this poisoning!!

Marty Roberts
Sebastopol

From: [Fabrice Habelski](#)
To: [Farallon Islands Consistency](#)
Subject: Dropping Rat Poison is not the answer
Date: Tuesday, April 20, 2021 9:24:52 PM

Dear Madam, Sir,

I am writing to express my disbelief at this renewed attempt to use industrial-style techniques to kill one species in order to potentially save another. This process that strangely reminds us of what the CIA did on humans in Vietnam decades ago, will undoubtedly create a toxic environment for the thousands of animals who find refuge on the Farallon Islands - a Nature Preserve.

IF rodents need to be killed in order to save the Burrowing Owls (are they really in danger when they come to feed from the Marin Headlands to the Farallones?), surely there must be "cleaner" methods that are less damaging to the ecosystem. We commonly use Bait Boxes with gel caps to kill rats - and only rats - a very effective process. This is just 1 suggestion, there are certainly others.

Please DO NOT authorize this drastic, senseless intervention. This will surely have catastrophic effects on many other species.

Thank you for your attention to this matter.

Fabrice Habelski
F H Wines
Vigneron Imports
(415) 823-2042

From: [Mark Penfold](#)
To: [Farallon Islands Consistency](#)
Subject: Farallones Poison Drop
Date: Friday, April 9, 2021 10:24:58 AM

Dear Commissioner,

I have watched with horror your plans to drop poisoned baits onto the Farallones. As a long time Bay Area resident and now Coastal Sonoma dweller I am a lover of Nature and its capriciousness. While the patterns of nature may not always align with the trends of the day, any review of history will tell you that man's intervention in pursuit of a narrow and questionable goal, has ALWAYS ended in disaster.

I beg you to reconsider your intervention, or at the least pursue a more targeted and less destructive path. I would appreciate the chance to discuss further and can be contacted at this email address.

Thanks for your time, Mark Penfold, Sonoma County.

From: [Kathleen Jackson](#)
To: [Farallon Islands Consistency](#)
Subject: FRLON ISLAND RESTORATION
Date: Monday, April 12, 2021 4:45:17 PM

To Whom It May Concern,

I write to ask that the CA Coastal Commission make sure its plans for Farallon Islands Restoration is consistent with the Coastal Zone Management Program so that it will restore the ecosystem to the benefit of its wildlife.

In appreciation,
Kathleen Jackson

"For there is always light, if only we're brave enough to see it.
If only we're brave enough to be it."
Amanda Gorman

From: [Krygsman, Vail@Coastal](mailto:Krygsman.Vail@Coastal)
To: [Farallon Islands Consistency](#)
Subject: FW: Consistency Determination No CD-0006-21
Date: Tuesday, May 4, 2021 9:54:47 AM

From: Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>
Sent: Tuesday, May 4, 2021 9:39 AM
To: Krygsman, Vail@Coastal <vail.krygsman@coastal.ca.gov>
Subject: FW: Consistency Determination No CD-0006-21

From: Weber, John@Coastal <john.weber@coastal.ca.gov>
Sent: Tuesday, May 4, 2021 7:19 AM
To: Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>
Subject: Fw: Consistency Determination No CD-0006-21

From: roger.harris@comcast.net <roger.harris@comcast.net>
Sent: Monday, May 3, 2021 9:42 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Consistency Determination No CD-0006-21

To the California Coastal Commission:

I urge the commission to support a consistency determination for the US Fish and Wildlife Service's plan to remove invasive mice from the South Farallon Islands. In so doing, the commission would affirm science and help restore the islands to a more natural state.

Best regards,
Roger D. Harris
Oceanic Society

[Roger D. Harris](#)
[10 Echo Avenues](#)
[Corte Madera, CA 94925](#)
[510/710-9120 \(cell\)](#)

From: roger.harris@comcast.net
To: [Farallon Islands Consistency](#)
Subject: In support of Consistency Determination No CD-0006-21
Date: Sunday, May 9, 2021 5:15:44 PM

Dear Commissioners:

Thank you for the opportunity to comment in support CD-0006-21, the USFWS's project to eliminate non-native house mice from the Farallon Islands, which is fully consistent with the California Coastal Management Plan. I recommend that you approve the proposed action as the most prudently targeted and environmentally benign approach at the Farallones, consistent with responsible stewardship.

As a Certified Wildlife Biologist, I have some 35 years of experience working professionally in the coastal zone. I have worked on the Farallones with Point Blue Conservation Science (formerly Point Reyes Bird Observatory). As a naturalist with the Oceanic Society, the oldest ocean-oriented conservation organization in the US, I have led educational boat trips to the islands for 35 years.

There have been some major conservation successes, based on wise human actions, at the Farallones: the return of the northern elephant seal as a breeding species after it had been thought to have gone extinct throughout its range; the return of the northern fur seal as a breeding species after it had been extirpated from the islands in the early 1800s by sealers; the return of hundreds of thousands of breeding common murrelets after eggings and other factors had reduced their populations to a few thousand; the return of breeding rhinoceros auklets after non-native European hares were removed from the islands.

This is an opportunity for another significant conservation success with the potential to remove non-native house mice from the South Farallones and allow native seabirds to thrive. Of particular concern are the three species of storm-petrels found on the islands. Ashy and Leach's are known breeders, and fork-tailed has been detected in the breeding season. Of global significance is the fact that some 50% of the world's population of ashy storm-petrels nest on the islands.

As has been well documented, the population of non-native house mice attract predacious burrowing owls, which switch to preying on storm-petrels when the mouse population seasonally declines. (I am a co-author of the California Department of Fish and Wildlife's original protocol on burrowing owls.) Also documented is the direct impact of non-native house mice on storm-petrels and other seabirds.

Opponents of pesticide use confuse the chemotherapy for the cancer and consequently fail to properly consider the health of the patient, which is the environment. It is my professional opinion that the proposed action is the environmentally superior one. Thank you for this opportunity to comment.

Sincerely,

From: [Cindy Culcasi](#)
To: [Farallon Islands Consistency](#)
Cc: [Cindy Culcasi](#)
Subject: Invasive House Mouse Eradication Project - Farallon Islands
Date: Monday, April 12, 2021 11:26:02 AM

I am writing this email because I am opposed to the use of Brodifacoum to alleviate the mouse problem. I realize that this is a difficult problem, but using a strong rodenticide is not the answer. How many other animals will die as a result? There is no way to target just the mice plus, if another animal eats a mouse after they eat Brodifacoum, they will die also.

Please look for another method to address this issue. This can't be the only answer/method to use.

Sincerely,
Cindy Culcasi
1830 Castellina Drive
Brentwood, CA

From: [Tony](#)
To: [Farallon Islands Consistency](#)
Subject: Island poisoning
Date: Friday, April 9, 2021 11:35:59 AM

We are shocked to read that you — a government agency mandated to protect the environment — are proposing to drop poison on the Farallon Islands to eradicate mice and discourage owls. The Farallon Islands are, of course, an ecosystem and therefore, like all ecosystems, everything is interconnected with everything else. Indiscriminate poisoning will therefore inevitably have widespread and unintended serious consequences. (Just today — 4/9 — I read that CNN has reported that the US Fish and Wildlife Service has found 82% of eagles in the country have rodenticides in their blood.) It is amazing that you would even consider such a procedure as blanket poisoning. How would you ever think that this is protecting the environment? Even if all other ways are more expensive, spend the money or cancel the entire project, but please DO NOT poison the Farallon Islands.

Thank you,

Anthony Mountain, a California resident

Cheryl Maynard, a California resident (cmaynard@sonic.net)

From: [allkiddingaside \(null\)](#)
To: [Farallon Islands Consistency](#)
Cc: [Richard Charter](#)
Subject: Mice eradication on the farallons
Date: Wednesday, April 21, 2021 10:46:55 AM

Dear protectors of our coast,

I would like to register my vociferous objection to the rather insane plan to Poison the environment of the farallons... This mouse cure would not only tend to kill the patient but risk entire hospital.. It's akin to the Vietnam war philosophy of 'to save the village we must destroy the village'... Surely, there must be a better way..... Please explore every other solution rather than this one... Thanks for your time...

Fred Albrecht of 3527 Coffey Meadow Place Santa Rosa California

Sent from my iPad

From: [Peter Colasanti](#)
To: [Farallon Islands Consistency](#)
Cc: [Susan Kirks](#)
Subject: Mouse eradication
Date: Wednesday, June 9, 2021 3:45:29 PM

Dear Commisioners,

I'm a lifelong student of biology/citizen scientist/birder with a particular interest in pelagic birds; I inaugurated running pelagic trips for Redwood Region Ornithological Society a decade ago and have since delegated that project to Eugene Hunn. Having watched for close to two decades the development of efforts to eradicate introduced rodents at the Farallons, I feel the need to comment on current efforts while watching the wheels spin.

US Fish and Wildlife currently plans to drop rodenticide to eliminate the house mice that have been wreaking havoc with the ecology of the islands generally since before I was born. Their plan is quite conservative, having been used on over 600 islands worldwide with stellar results. Proposals to use some undeveloped contraceptive are logistically impossible (ask anyone who has spent time there) and simply naïve. As a member of local chapters of Audubon Societies since 1974 I'm perplexed and frankly embarrassed to see that Madrone Audubon is on record as opposing US Fish and Wildlife's effort. Other members I've spoken with on the subject share my concern and favor the current plan, without exception. Hopefully this fall it will come to fruition, with your wise backing.

Thanks,

Peter Colasanti

524 East D Street

Petaluma, CA 94952

707 780-7296

From: [Judith Fortney](#)
To: [Farallon Islands Consistency](#)
Subject: Mouse removal
Date: Tuesday, July 6, 2021 11:15:53 AM

Dear Commissioners,

I am one of the few people privileged to have been on the main island of the Farallons. The density and diversity of sea birds and marine mammals was awe-inspiring.

That density and diversity is currently threatened by house mice brought inadvertently to the island by humans. As you know, the introduction of an alien species can completely up-end the balance of nature especially in a small ecosystem like the Farallons.

I urge you to decide to support the removal of the mice in order to restore that delicate ecosystem. The proposed method of removal is tried and true over the years and has resulted in the recovery of that delicate balance.

Sincerely.

Judith Fortney
Founding member of the Farallon Island Foundation

From: [James Ransom](#)
To: [Farallon Islands Consistency](#)
Subject: No place to put the rat poison?
Date: Monday, April 12, 2021 3:56:31 PM

Well sure as heck don't put it on a wild lief sanctuary, especially near the Ocean. The Ocean get's dumped in too way to often not to mention the other harms done to it's wild life through military, commercial industry, nuclear, and tourism.

I object to the Farallon Islands rat poison program.

Sincerely, Jim Ransom

From: [Marilyn Laatsch](#)
To: [Farallon Islands Consistency](#)
Subject: No Poison On The Islands
Date: Tuesday, April 13, 2021 11:57:15 AM

To Staff,
Please find a deterrent that does not kill the eco system of this
unique & abundant sanctuary. EVERY EFFORT TO KEEP LIFE
ALIVE & HEALTHY IS VITAL TO THIS CRITICAL AND BELOVED
HAVEN. PLEASE...PLEASE TAKE THE GREATEST CARE IN
THIS DECISION.

Many thanks,

Marilyn Laatsch
marilynlaatsch@gmail.com
Muir Beach, Ca.

From: [tracy oakley](#)
To: [Farallon Islands Consistency](#)
Cc: [tko661@gmail.com](#)
Subject: No poison!
Date: Monday, April 19, 2021 2:58:50 PM

I object to the use of poison to control the environment. You will destroy it, and all of the life it supports for decades. Find another way, or leave it alone.

Thanks,

Tracy Oakley
661 Chapman drive
Campbell , CA. 95008

From: [Frank](#)
To: [Farallon Islands Consistency](#)
Subject: No poisoning if Faralloms!
Date: Thursday, April 22, 2021 6:44:42 AM

Dear Commissioners:

There is no green or ecological sense to be made of harming the ecosystem of the Farallons with toxic chemicals. Cease and desist. Thank you, Frank Snapp

From: [Andy Wellspring](#)
To: [Farallon Islands Consistency](#)
Subject: No Rat Poison on the islands
Date: Monday, April 12, 2021 7:51:50 PM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. **Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away.** This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,
Andy Wellspring
Fort Bragg, CA

From: [Julia Apte](#)
To: [Farallon Islands Consistency](#)
Subject: No Rat Poison
Date: Tuesday, April 20, 2021 11:27:22 AM

Putting rat poison into the wild is unconscionable! There's no excuse for this - do not corrupt our wildlife food chains. Regards,

Julia Apte

PhD scientist and advocate for common sense

From: [Deborah Graham](#)
To: [Farallon Islands Consistency](#)
Subject: No to poison drop
Date: Friday, April 9, 2021 8:18:19 AM

Dear Coastal Commissioners,

Please reconsider using poison for mice fertility control. Other non toxic alternatives exist which will not harm other creatures on the islands and it's environs.

Sincerely,

Deborah Graham

Mill Valley

Sent from my iPhone

From: [Leigh Anne Lindsey](#)
To: [Farallon Islands Consistency](#)
Subject: No. Just No on Poison Pellets
Date: Tuesday, April 27, 2021 2:09:37 PM

As a film in radio documentarian, I protest against poison pellets for the Farallon Islands. There has to be a better way than poisoning the whole ecosystem. Please do not do that to this special place on our planet. It will have wide and far-ranging damaging effects to all the wildlife and sea life in the area.

I have just listened to an excellent radio and YouTube show with Richard Charter senior fellow at the Ocean Institute, a long time friend and supporter of the public radio station in Gualala that I support. Catch the show with host Peggy Berryhill on the KGUA YouTube channel.

Find another way to solve the mice problem on the Farallon Islands. This poison pellet path is the wrong one. Absolutely the wrong one! And I for one do protest it. And all of those who are allowing this to come about --who have let it get this far-- should be ashamed of themselves that they cannot --in this day and age-- think of a better way.

There is always a better way. Find it! And do not destroy this unique ecosystem in our beautiful San Francisco Bay Area.

Leigh Anne Lindsey
707-888-6844

Volunteer Producer & Host KGUA public radio in Gualala, Mendocino County CA
Homeowner, The Sea Ranch, Sonoma County, CA
Film documentarian, Sea Storm Studios
Co-owner, Linholme Ranch & Vineyards, Redwood Valley, Mendocino County CA (part of the former home of Seabiscuit)

Former longtime resident of the San Francisco Bay Area (Sunnyvale, San Francisco, Mill Valley, Sausalito and Montara.) Since the 1980s. 18 years working in the Silicon Valley tech industry.

(sent from my phone)

From: rockyann614@comcast.net
To: [Farallon Islands Consistency](#)
Subject: Opposed to Poisoning the Farallones
Date: Monday, May 31, 2021 12:51:20 PM

To Greetings

I strongly oppose the US Fish and Wildlife Service's proposal to drop a 2nd generation anticoagulant poison on the Farallon islands, which will clearly also poison our marine sanctuaries as well as infiltrate the food chain and secondarily poison many other species including raptors.

Please use a multifaceted alternative, proactive, low risk, longer and safer approach to eliminate the mouse population.

I strongly support protection of our marine sanctuaries, the Farallon Islands ecosystem, and I request the requirement of a different, intelligent, safer approach to address the mouse issue and to protect the Ashy Storm-Petrel as well as many other species on and around the Farallon Islands.

Thank you
Claire Etienne

www.hauerapple.com

Accumulated small positive acts can turn a tide.

From: [Christy Martin](#)
To: [Farallon Islands Consistency](#)
Subject: Plan to poison the mice
Date: Monday, April 19, 2021 4:52:36 PM

To those responsible for the Farallon Islands mouse issue at the California Coastal Commission:

I am concerned about the plan of the USFWS proposal to airdrop and hand place 2,917 pounds of cereal pellets laced with a rodenticide on the 10 rocky **islands** and islets of South **Farallon Islands** to **eradicate** an estimated population of 60,000 **mice**.

It seems that the environmental impact of poisoning these rodents would lead to other animals who eat them being poisoned and killed. I have read up on the issue and know that you are trying your best to prevent an already environmentally imbalanced situation from getting worse. I am concerned about the Ashy Storm Petrels that live on the Farrallones and hope that somehow you will also figure out how to protect them.

Thank you.
Christina Martin
Los Altos, CA 94024

From: [Bobbie Best](#)
To: [Farallon Islands Consistency](#)
Subject: PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto South east Farallon Island
Date: Friday, April 9, 2021 7:53:53 PM

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.

Thank you!
Mr. and Mrs. B. Best
280 Hauoli
Wailuku, HI 96793

From: [Steve Freid](#)
To: [Farallon Islands Consistency](#)
Subject: PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto Southeast Farallon Island
Date: Sunday, April 11, 2021 5:49:44 PM

PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto Southeast Farallon Island.

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.

Steven Freid
PO Box 790810
Paia, HI 96779

--

Aloha and Sawadee Kap,

Steve

<http://lifeonmaui.com/>
213-293-5043

From: [Nick Ramsdell](#)
To: [Farallon Islands Consistency](#)
Subject: Please Do Not Poison the Farallon Islands
Date: Tuesday, April 13, 2021 9:08:50 AM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. *Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away. *This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,
Nicholas Ramsdell, Albion, CA

From: [Susana Hennessey Lavery](#)
To: [Farallon Islands Consistency](#)
Subject: Please don't allow poisoning of the Farallon Islands
Date: Tuesday, April 13, 2021 2:46:40 AM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. *Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away. *This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,

Susana Hennessey Lavery

From: [Maria](#)
To: [Farallon Islands Consistency](#)
Subject: Please don't poison Birds on FARALLON ISLAND!
Date: Monday, April 12, 2021 1:51:27 AM

Dear Friends,
Aloha! PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto Southeast Farallon Island.

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.

Mahalo Nui Loa,
Patricia Gardner

PO Box 624
Haiku, Maui, HI. 96708
love@lightweavingjoy.com

From: [KATHLEEN PRASAD](#)
To: [Farallon Islands Consistency](#)
Subject: Please don't poison the Farallones
Date: Tuesday, April 13, 2021 6:58:49 AM

Dear Commissioner:

I am writing to request that you REJECT the latest reapplication for a consistency determination on the pending the US Fish and Wildlife Service poison dispersal plan for the Southeast Farallon Island. As you know, this proposal targets the middle of a treasured State Marine Reserve and would also be right in the midst of our longstanding Greater Farallones National Marine Sanctuary within whose waters such activities are expressly precluded. Our Marine Sanctuary regulations even ban pollutants that "enter and injure" Sanctuary resources from outside of the boundaries of the sanctuary.

As a constituent and admirer of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I must ask that you deny the requested consistency finding for this proposal.

Responsible stewardship of America's public trust living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach.

Please reject consistency for this item, since to do otherwise would set a terrible precedent for both the Commission and for our Sanctuary waters.

Thank you very much.

Kathleen Prasad
79 Jordan Ave., San Anselmo, CA 94960

From: [Linda Jo Stern](#)
To: [Farallon Islands Consistency](#)
Subject: please don't use poison
Date: Thursday, April 8, 2021 9:09:21 PM

Dear Coastal Commissioners,

The plan to drop poison bait to kill mice that attract owls to the Farallons would be mindless shortsightedness with predictably dire consequences. Rather than spread toxicity throughout the islands' food chain, US Fish & Wildlife must be directed to find a less lethal/more targeted solution to the current imbalance. I urge you to prevent Fish & Wildlife from foolishly deploying their "nuclear option." Please use your power to protect a rare California ecosystem at a time of accelerating extinction.

Thank you.

Linda Jo

Linda Jo Stern, MPH
Coordinator - Coastal Street Medicine
lindajostern@gmail.com
sternlj@ah.org
617-435-8412 (mobile)

From: [Lisa Fait nee Goldstein](#)
To: [Farallon Islands Consistency](#)
Subject: Please preserve this amazing wildlife outpost—no poison drop!
Date: Saturday, April 17, 2021 7:59:42 AM

I so appreciate the plan to preserve the natural wildlife on the Farallon Islands by removing the mice population which draws in owls that then feed on other local birds. Please don't do it with poison that will effect the rest of the wildlife too!

I have no doubt our brilliant scientists have other solutions to limit the mice population that does not have such negative effects. Preserving one type of wildlife in a way that will hurt so many others is shooting backwards.

Thank you!
Lisa

From: [Lonna Richmond](#)
To: [Farallon Islands Consistency](#)
Subject: poison air drop
Date: Thursday, April 8, 2021 10:39:17 PM

hello,

this is not my first time writing about this, but it has come to my attention again that you plan on going through with this unthinkable plan.

DON'T DO IT - PLEASE

you know there are alternatives to this and you must use them. blanket killing is absurd and especially when all animals, great and small, seem to be struggling to stay alive.

sincerely,
lonna richmond

From: [Daniel C. Eckhard](#)
To: [Farallon Islands Consistency](#)
Cc: [Daniel C. Eckhard](#)
Subject: Poison and Burrowing Owls
Date: Tuesday, April 20, 2021 8:10:47 PM

To whom it may concern,

Please use an alternative method to remove or reduce the burrowing owl population on the Farallon Islands. As we all know, the unintended consequences of poisoning is frequently not predictable, and the Farallon Island population of other birds and animals will likely be effected in an as yet unknown way.

Do the right thing and come up with a better plan!

Dan Eckhard

From: [Tanya Charter](#)
To: [Farallon Islands Consistency](#)
Subject: Poison bait drop on the Farallon Islands
Date: Friday, April 16, 2021 3:23:33 PM

To Whom It May Concern,

I oppose the proposed helicopter dispersal of 1.5 tons of rat poison pellets in the middle of the Greater Farallones National Marine Sanctuary.

The controversial second-generation anticoagulant poison being proposed for use in the Sanctuary is the subject of increased scientific scrutiny and public concern because of its documented association with the vast amount of unnecessary killing of non-target wildlife during similar air drops on island locations elsewhere, an impact called “bykill”. The State of California has outlawed retail sale of the same toxic compound due to the unintended damage inflicted on eagles, hawks, mountain lions, foxes, bobcats, an iconic mammal called the Pacific Fisher, and, in terrestrial urban interface locations, the danger of accidental poisoning of domestic pets and even small children. Legislation limiting the use of this poison is now moving through the California State Legislature as a two-year bill. Some within the Wildlife Service admit that large numbers of gulls ingesting the poison pellets offshore during a helicopter drop can be expected to return to die in mainland locations these birds frequent, such as at Fishermen’s Wharf. EPA officials have raised similar concerns about the carcasses of poisoned Western Gulls that would inevitably wash ashore or die on our coastal beaches that will then need to be handled with special precautions as hazardous materials. Any accidental wind- or wave-borne discharges of the poison into the ocean also pose a contamination hazard to fish, crabs, and abalone, putting the fishing industry and our local economies at risk.

There are less dangerous and more targeted and species-specific ways to get rid of the mice on the Farallones, using non-toxic contraceptive baits already being licensed by the EPA, with none of the threats of biomagnification while avoiding the wholesale killing of non-target species as now posed by the latest iteration of the US Fish and Wildlife Service poisoning scheme.

Please do not agree to this inappropriate plan.

Thank you for your consideration in this matter.

Judith Charter
Cazadero CA

From: [James Orenberg](#)
To: [Farallon Islands Consistency](#)
Subject: Poison drop on Farallon Islands
Date: Wednesday, April 21, 2021 3:42:09 PM

I object strongly to the poison drop on the Farallon Islands. This is not a well thought out environmental solution to a minor problem,. Let Nature play out its course!

Jim Orenberg

. Let Nature play out its course!

--

James Orenberg
Professor Emeritus
Dept. of Chemistry and Biochemistry
San Francisco State University



Virus-free. www.avast.com

From: [Wendy Gallo](#)
To: [Farallon Islands Consistency](#)
Subject: Poison is not a sustainable long term or short term solution
Date: Monday, April 12, 2021 1:10:04 PM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. *Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away. *This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,
Wendy Gallo
mendocino County, Californial, USA

Wendy Gallo MA. LMFT.

Nature-based therapist

Naturebasedtherapy.org

(707)409~0177

*“Yesterday I was clever, so I wanted to change the world.
Today I am wise, so I am changing myself.”
— Rumi*

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From: [Kamala Allen](#)
To: [Farallon Islands Consistency](#)
Subject: Poison on the Farallon Islands
Date: Saturday, April 10, 2021 6:47:28 PM

Dear Sir or Madam:

I am writing to urge you to ban poison on the Farallon Islands, home to many different species. Allowing poison to be dropped there would kill the wildlife there and make it impossible for them to call the islands home for perhaps decades. Poisoning one of the species would upset the delicate ecological balance there. Please do not allow this to happen.

Sincerely,

Kamala Allen
53 Marin Valley Dr.
Novato, CA 94949
415-306-6865

From: [Kathleen Loia](#)
To: [Farallon Islands Consistency](#)
Subject: Poison Options
Date: Tuesday, April 20, 2021 2:51:40 PM

1.5 tons of poison dropped from a helicopter seems like overkill.... the quintessential definition of overkill. Please find a safer way to deal with the mice.

From: [Ernst Karel](#)
To: [Farallon Islands Consistency](#)
Subject: poison???
Date: Sunday, April 18, 2021 12:31:53 PM

Hello,

I'm writing from our house near the Muir Beach Overlook, where we can see the Farallon Islands on clear days. I have just heard that there is a plan to drop 1.5 tons of poison on the entire ecosystem there with some kind of idea that it will only affect SOME species.

I feel like I must be misunderstanding, as that is such a patently, and violently, stupid idea. Was such an idea actually considered? Obviously any such poison will affect the entire ecosystem. Is there a further explanation of what the thinking is here?

Thanks,
Ernst Karel
15 Muir Beach Overlook

From: [Norma J.F. Harrison](#)
To: [Farallon Islands Consistency](#)
Subject: poisoning owls on the farallons
Date: Thursday, April 22, 2021 4:13:27 AM

don't

Norma J F Harrison 1312 Cornell Ave., Berkeley CA 94702 510-526-3968
normaha@pacbell.net
www.PeaceandFreedom.org

From: [Erif Thunen](#)
To: [Farallon Islands Consistency](#)
Subject: Proposed poisoning of the Farallon Islands
Date: Monday, April 12, 2021 2:16:34 PM

12 April 2021

TO: California Coastal Commission:

In 2019, the U.S. Fish & Wildlife (USFW) proposed to poison the Farallon Islands to control a mouse population, but public outcry along with the California Coastal Commission stopped this outrageous proposal. USFW then encouraged burrowing owl populations to kill the mice.

Now USFW wants to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away, allegedly to protect the Ashy Storm Petrel. But this would have a devastating effect on the entire ecosystem of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. The poison would also have a detrimental effect on the petrel they are trying to save, as it would affect the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Apparently USFW needs to get rid of 1.5 tons of rat poison that they otherwise do not know what to do with. But that is another topic and should be handled appropriately, *not* dumped on a marine wildlife sanctuary.

Please rule, once again, that the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, is still not in compliance with California's coastal management rules.

Very truly yours,

Erif Thunen.

12 April 2021

From: [Harolde Searles](#)
To: [Farallon Islands Consistency](#)
Cc: [announce](#); opc@lists.mcn.org
Subject: Proposed poisoning of the Farralones
Date: Monday, April 12, 2021 11:43:59 AM

I cannot imagine a more inappropriate, brutish, counter productive, unimaginative approach to a perceived “problem”.

If you cannot let nature take it’s course, as it generally does very effectively on its own, at least try something that is not going to go through the food chain.

NO poison!

From: [President](#)
To: [Farallon Islands Consistency](#)
Subject: Rat Poison is a Terrible Solution
Date: Tuesday, April 13, 2021 6:50:09 AM

To whom it may concern--I am swamped, booked, but a concerned citizen. I can't study this issue as I have to study the issues outside my backdoor in order to comment effectively. However, I am a small farm owner and well versed on how to use and not use rat poison. It is well known that rat poison is more dangerous to birds than to rats. The Farallon Islands, as a crucial piece of the endangered seabird puzzle, should be the last place anyone would propose to dump 1.5 tons of any toxic substance, let alone rat poison. Please reconsider!

Chad Swimmer, President

[he/him/his](#)
www.mendocinotrailstewards.org



From: [Ellen Holmes](#)
To: [Farallon Islands Consistency](#)
Subject: Rat poison on Farrallones
Date: Thursday, April 22, 2021 12:07:47 AM

Dear Coastal Commission,

The plan to drop more than a thousand tons of rat poison onto this precious sanctuary is a terrible idea!! Absolutely not! Let the owls take care of the mice problem!

Rat poison will kill vast numbers of birds, mammals and fish in a horrible way, causing immense suffering.

Leave Nature alone! Instead of dropping poison, PLEASE drop this very bad idea!

Thank you,

Ellen Holmes
PO BOX 393
Bollinas, Ca 94924

From: [Emily Cronander](#)
To: [Farallon Islands Consistency](#)
Subject: Rat poison
Date: Monday, April 19, 2021 9:11:36 PM

I read that you are planning on using rat poison on the islands- PLEASE DO NOT USE POISON. It kills not only the intended targets but other animals as well. Burrowing owls live there and will eat poisoned wildlife. Please don't use poison as it kills unintended animals.
-Emily Cronander

From: [Cindy Cobb](#)
To: [Farallon Islands Consistency](#)
Subject: Rat poison?!
Date: Monday, April 19, 2021 10:18:16 PM

Please reconsider the misguided plan to drop rat poison on the Farallons! It would be an environmental disaster m,

Poison kills everything! Not just rats.

To remove the rats from the islands, do it the poison-free way and pay people with ratter dogs to kill and remove them. Think of a better solution.

<https://www.fox5ny.com/news/meet-the-rat-hunters-dogs-join-the-fight-against-nycs-rodent-problem.amp>

Cindy Cobb
Sent from my iPhone

From: [kYra Dear](#)
To: [Harolde Searles](#)
Cc: [Farallon Islands Consistency](#); [announce](#); [Ocean Protection Coalition](#)
Subject: Re: [MCN-Announce]- Proposed poisoning of the Farralones
Date: Monday, April 12, 2021 11:48:08 AM

Please write a letter to the CA Coastal Commission!!

farallonislands@coastal.ca.gov

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the US Fish and Wildlife (USFW) from poisoning the Farallon Island to control a house mice infestation, so instead USFW encouraged burrowing owl populations to kill the mice. **Now USFW are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away.** This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species USFW say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. It is common knowledge that poison negatively impacts entire ecosystems. Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with because of the above stated fact. But that is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,
[your name and place of residence]

here is background on this issue from 2019:

<https://www.kqed.org/news/11760328/feds-withdraw-plan-to-drop-rat-poison-on-farallon-islands-for-now>

On Mon, Apr 12, 2021 at 11:44 AM Harolde Searles <harolde@mcn.org> wrote:

I cannot imagine a more inappropriate, brutish, counter productive, unimaginative approach to a perceived “problem”.

If you cannot let nature take it's course, as it generally does very effectively on its own, at least try something that is not going to go through the food chain.

NO poison!

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From: [creek shade](#)
To: [Farallon Islands Consistency](#)
Cc: [OSC - Earth Action Campaign](#); [Ruess](#); [Anne Cummings Jacopetti](#); [Suzanne Doyle](#); [Janis Watkins](#); [jennyb](#); [Michael Allen](#); [Tonja Chi](#); [Patti Trimble](#)
Subject: Re: Note Recommending Against the Use of Toxic Rodenticide Drops on Farallones
Date: Saturday, April 24, 2021 2:37:16 PM
Attachments: [image.png](#)

Respected Biologists and Managers,

My understanding is that you are considering the use of toxic rodenticide drops over the Farallones.

I would like to draw your attention to a 2-year risk assessment study examining the toxic effects of rodenticides on non-target animals including raptors. Our study used ecological risk assessment calculations based on previously established toxicity data, and included a wide variety of commonly used rodenticides including diphacinone, imidacloprid and zinc phosphide. Please note that brodifacoum, which has been used in the past, is a rodenticide in the same anticoagulant family as diphacinone. Imidacloprid is sometimes blended into the anticoagulant rodenticides and is also extremely toxic to non-target receptors including native birds (Mineau and Palmer 2013).

As the name indicates, anticoagulant rodenticides cause animals to bleed internally. Causes of mortality are internal hemorrhaging and related toxicity effects (McMillin 2017); non-target wildlife is definitely impacted (Lima and Salmon 2010; Hosea 2000; US EPA 1998a). Significant toxic impacts have been observed on screech owls, great-horned owls and golden eagles. These previously obtained toxicity studies indicate negative impacts are anticipated for burrowing owls and other native birds.

Our study concluded that rodenticide drops would have heavy impacts on non-target wildlife including protected and sensitive species. Furthermore, many rodenticides can persist, which can result in exposure over longer terms.

Please consider my note as a strong recommendation against pesticide drops on the Farallone Islands. We cannot afford to lose more wildlife. Please consider using non-toxic rodent removal options, if at all, or benign neglect.

Multiple other references and our exposure dose calculations are available if desired.

Best regards,

Maya Khosla
Wildlife Biologist and Toxicologist

Selected References

Hosea, R. 2000. Exposure of Non-Target Wildlife to Anticoagulant Target Wildlife to Anticoagulant Rodenticides in California. Proceedings of the 19th Vertebrate Pest Conference.

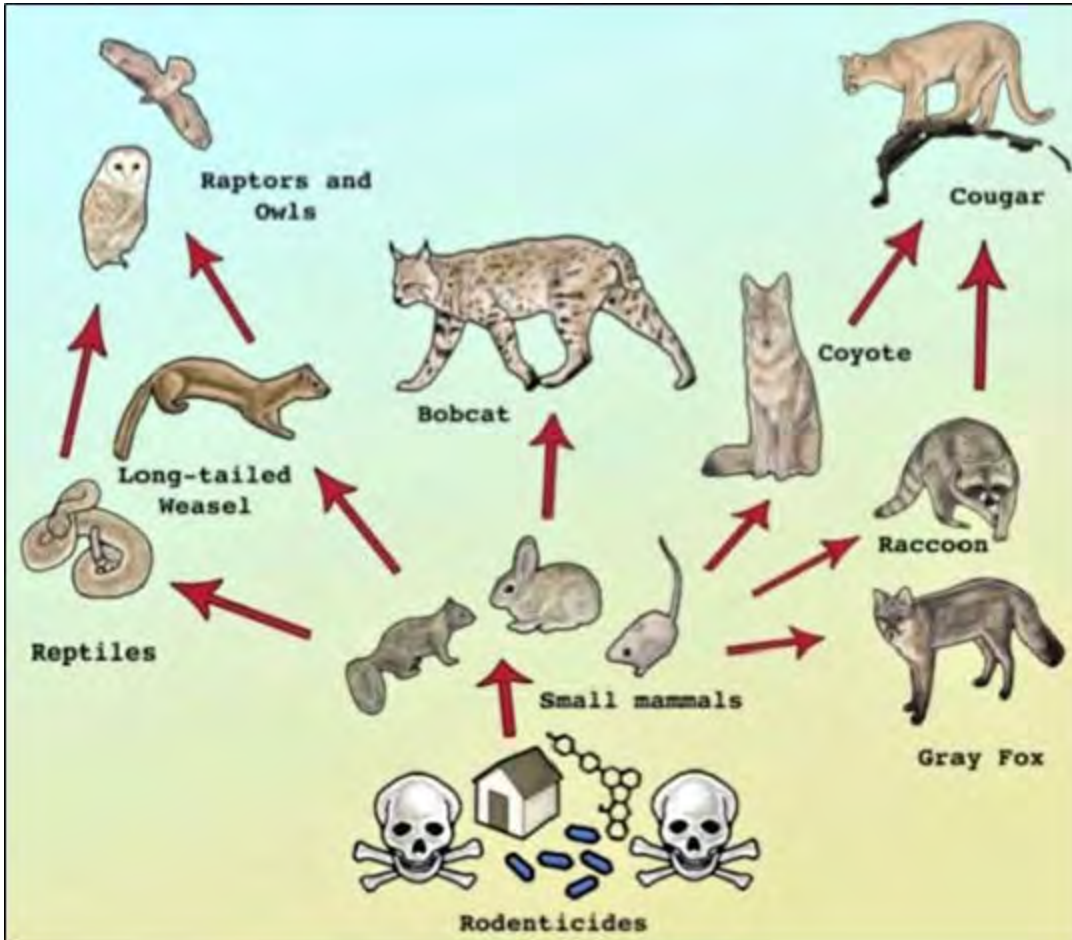
Lima L. and T. Salmon. 2010. Assessing some potential environmental impacts from agricultural anticoagulant uses. Proceedings of the 24th Vertebrate Pest Conference. Proceedings of Vertebrate Pest Conference. University of California Davis. 199-203.

McMillin, S. 2017. Conference Paper: Impacts to non-target wildlife from

rodenticide use in urban areas. Urban Wildlife Conference. June 7.

Mineau, P. and C. Palmer. 2013. The Impact of the Nation's Most Widely Used Insecticides on Birds. American Bird Conservancy Report.

US EPA.1991. Reregistration Eligibility Decision (RED): Rodenticide Cluster.
EPA 738-F-98-004.



From: [Ellen Stephens](#)
To: [Farallon Islands Consistency](#)
Subject: RE: Poison Free Alternatives please!!!!
Date: Tuesday, April 20, 2021 2:54:56 PM

Please do NOT poison rodents and other wildlife on the Farallon Islands!!!!

There must be poison free alternatives!!!!

Thank you for your consideration,
Ellen Stephens

From: [Richard Trissel](#)
To: [Farallon Islands Consistency](#)
Subject: Re: Stop the poison drop on Farallon Islands
Date: Friday, April 9, 2021 10:44:55 AM

Dear California Coastal Commissioners,

You must put a stop to this toxic poison drop on the jewels that are the Farallon Islands. Please use your influence to protect this special area from the deployment of a poison that cannot possibly be completely controlled. The direct risks to species beyond mice and predators preying on animals who have been poisoned is too great.

In gratitude for your attention and hope for a just outcome for the ecosystem of the islands.

Richard Trissel
Gualala, CA

From: [Laura Duggan](#)
To: [Farallon Islands Consistency](#)
Subject: Regarding Mouse Eradication Proposal
Date: Sunday, May 30, 2021 7:22:50 PM

Dear Sirs and Madams,

I have read much of the proposal to drop Broadifacoum on the Farallon Islands as a means of mouse eradication. Your report is very thorough, but quite disturbing. While I do not disagree with the need to reduce (but not eradicate) the mouse population, I do NOT agree with using a toxic substance. We have got to get beyond poisoning our planet, and anything on our planet.

In particular, your report notes in its detailed table that 21 species have high sensitivity; 7 with high sensitivity/high risk. In my assessment even 1 species with high sensitivity and high risk is too many.

In addition, in order to create a safe environment, you propose hazing gulls, capturing raptors and salamanders, and flushing pinnipeds...

All of the above would not be needed if you used a Non-toxic approach.

I urge you to reject the proposal to add more poison to our fragile ecosystem, and work with interested parties to provide a non-toxic solution. I believe the Audubon and other groups will provide another approach. I urge you to take that into consideration before acting in a fashion that will adversely impact our ecosystem.

Thank you.

Laura Duggan
PO Box 2345
Sebastopol, CA, 95473

From: [Annemarie](#)
To: [Farallon Islands Consistency](#); [Carl_Dan@Coastal](#); [Manna_Jeannine@Coastal](#); [Rexing_Stephanie@Coastal](#); [Marquez_Maria_Elena@Coastal](#); [NorthCentralCoast@Coastal](#)
Subject: REJECT the latest reapplication for a consistency determination on the pending the US Fish and Wildlife Service poison dispersal plan for the Southeast Farallon Island
Date: Sunday, April 11, 2021 11:09:01 AM

Hi,

Please share my e-mail with the commissioners. Thanks, Annemarie Weibel

Dear Commissioners,

I am writing to request that you REJECT the latest reapplication for a consistency determination on the pending of the US Fish and Wildlife Service poison dispersal plan for the Southeast Farallon Island.

As you know, this proposal targets the middle of a treasured State Marine Reserve and would also be right in the midst of our longstanding Greater Farallones National Marine Sanctuary within whose waters such activities are expressly precluded. Our Marine Sanctuary regulations even ban pollutants that “enter and injure” Sanctuary resources from outside of the boundaries of the sanctuary. As a constituent and admirer of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I must ask that you deny the requested consistency finding for this proposal.

It remains incumbent on the Wildlife Service to find a more targeted and environmentally benign single-species approach at the Farallones, one less dependent on persistent food-chain poisons that have a known record of killing animals that are not part of the problem. Responsible stewardship of America’s public trust living resources, particularly within our National Marine Sanctuaries and elsewhere on the California coast, deserves a more precautionary approach.

Please reject consistency for this item, since to do otherwise would set a terrible precedent for both the Commission and for our Sanctuary waters.

Thank you very much.

Sincerely,

Annemarie Weibel
Albion, Ca 95410

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This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

From: [Nancy Hanson](#)
To: [Farallon Islands Consistency](#)
Subject: rodent eradication
Date: Sunday, April 11, 2021 6:28:36 PM

I support the Eradication Plan for restoring the unique ecosystem of the Farallon Islands. It is consistent with the Coastal Zone Management Program for California. We should not delay any longer as the situation will only get worse with time. More nestlings will be lost.

The choice is clear: save the non-native mice that are decimating the islands' indigenous and rare species or save the islands' indigenous species. These include nesting Leach's and Ashy Storm Petrel, Farallon Arboreal Salamander, and Farallon Camel Cricket. Complete eradication is essential. If even a few mice are left, the infestation will simply recur.

The only alternative is a carefully planned one-time application, in two phases, of a rodenticide. Similar programs have been used to successfully remove non-native rodents on 700 islands throughout the world with no significant environmental effects or harm to non-target species.

Even the person who developed the birth control chemical for rats has admitted that such a chemical for mice does not exist and that temporary sterilization only reduces, but does not eradicate, populations. Total eradication is the only viable alternative.

Please act swiftly and decisively to save this important sanctuary.

Sincerely, Nancy Hanson, Woodacre, CA 94973

From: [Ruth Rogers](#)
To: [Farallon Islands Consistency](#)
Subject: Rodenticide drop on Farallon Islands
Date: Thursday, May 13, 2021 7:02:38 PM

Dear Commissioner,

I urge you to reject the plans to drop anticoagulant and on the Farallon Islands. This mass poisoning plan has far too many long-term environmental impacts to go forward.

Mass poisoning of island rodents has, historically, proven either ineffective or resulted in a number of unforeseen consequences.

Rodent contraception is an available alternative that carries none of the risks of mass poisonings.

Thank you,

Ruth Rogers

From: [sfsophietag](#)
To: [Farallon Islands Consistency](#)
Subject: rodenticide on the Farallon Islands
Date: Saturday, July 3, 2021 4:57:18 PM

Please note the following: "If allowed to proceed with these plans, the US Fish and Wildlife Service will be contaminating the land and the water, for decades to come. Poison is indiscriminate: it will kill all animal life (both owls and Stormy Ash Petrels alike) that should consume the rodenticide, even before it is carried away by rain and sea, leaving a wake of death all around it."

Nature is able to take care of herself without the interference of insensitive humans who are not aware of the aftermath of dumping rodenticide on other creatures. Please stop this action.

Sophie Taggart

resident of San Francisco

From: [Deborah Pozin](#)
To: [Farallon Islands Consistency](#)
Subject: STOP DROPPING POISON ON FARALLON ISLAND AND ECO SYSTEM!
Date: Sunday, April 11, 2021 2:13:33 PM

As a California resident for half of my life, PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto South east Farallon Island.

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.

--

Deborah Maika'ikalani Pozin

From: [Manuela](#)
To: [Farallon Islands Consistency](#)
Subject: Stop poisoning the environment - Farrallon Islands
Date: Saturday, April 10, 2021 9:16:40 PM

I can see the Farralon Islands from my house in clear days and I would not like to harm this ecosystem allowing the U S Fish and Wildlife
To scatter 1.5 tons of poisoned bait into the Islands. I am sure there is a safe alternative for not damaging this ecosystem.

Thank you vey much,

Manuela Sherman
<https://manuelasherman.com>

From: [Zoe Walton](#)
To: [Farallon Islands Consistency](#)
Subject: Stop Poisoning the Farallon Islands
Date: Sunday, April 11, 2021 8:06:35 AM

PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto South east Farallon Island. I have been a California resident for 50 years.

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.

Zoe Walton Hansen L.Ac ,

From: [kYra Dear](#)
To: [Farallon Islands Consistency](#)
Subject: STOP THE POISON DUMP ON THE FARALLON ISLANDS
Date: Monday, April 12, 2021 10:41:31 AM

TO: California Coastal Commission:

In 2019 public outcry along with the California Coastal Commission stopped the poisoning of the Farallon Island for controlling a house mice infestation, and instead encouraged burrowing owl populations to kill the mice. Now US Fish and Wildlife are back at it and want to bombard the environmentally sensitive national marine sanctuary with 1.5 tons of rat poison to manage the mice so that the burrowing owls will go away. This will have a devastating effect on the entire ecosystems of the Islands, as well as the poison run off into the fisheries and ecosystems of the ocean wildlife. All of this to save one species. Really? That one species will not be affected at all by 1.5 tons of rat poison?

The answer is YES. In fact the poison will have a detrimental effect on the Ashy storm petrel, the one species they say they will save by poisoning the entire ecosystem.

Poison is NEVER a solution to save any species. I am no biologist but I have an intimate relationship with the land and ecosystems and understand that poison will and does affect entire ecosystems.

Clearly USFW needs to get rid of 1.5 tons of rat poison they otherwise do not know what to do with. That is another topic and should be handled appropriately and NOT dumped on a marine wildlife sanctuary.

Please be certain to rule that, once again, the same treatment US Fish and Wildlife was denied in 2019 by the California Coastal Commission, cited as not in compliance with California's coastal management rules, still applies today.

Sincerely,
Kyra Rice
Mendocino Coastal Resident

From: [Donna Larner Lavery](#)
To: [Farallon Islands Consistency](#)
Subject: Stop the poisoning
Date: Friday, April 9, 2021 2:04:11 PM

Please stop any poisoning as a solution to 'controlling' the ecosystem. There are alternatives that do not utilize poisons. Our reliance on poisons must end as we experience through the extinction of many species and cancers to us all after decades of being poisoned, that this 'immediate' solution costs us for lifetimes. Please stop using poisons of all kinds.

Donna Larner Lavery
dmlarnerlavery@aol.com
Santa Monica, CA

From: [Samantha Baldwin](#)
To: [Farallon Islands Consistency](#)
Subject: The future of Farallones Sanctuary
Date: Sunday, April 25, 2021 1:07:48 PM

Dear Commissioner,

As a constituent and supporter of the Greater Farallones National Marine Sanctuary, as well as a constituent of the California Coastal Commission, I am writing to request that you reject the pending request for a consistency determination on item W14a, the US Fish and Wildlife Service poison dispersal plan. Please consider the long term consequences of this plan.

It is critically important for the Wildlife Service to find a more targeted single-species approach at the Farallones, one less dependent on persistent food-chain poisons that have a known record of killing animals that are not part of the problem. Responsible stewardship of America's public trust living resources, particularly within our National Marine Sanctuaries on the California coast, deserves a safer approach.

Thank you,

Ava Samantha Baldwin

1347 Grand Ave.
San Rafael, CA 94901

From: [Anastasia Glikshtern](#)
To: [Farallon Islands Consistency](#)
Subject: Upcoming poisoning of Farallon Islands
Date: Thursday, April 22, 2021 4:17:32 PM

Dear Commissioners,

Please don't allow this crime against nature to take place.

These rat poisons should be banned everywhere on this earth - and especially never allowed in the wildlife sanctuary.

The only good use for these pellets is to feed them to the felons from the U.S. Fish and Wildlife Services (which dare to call themselves environmentalists) and to the Island Conservation criminal enterprise.

Sincerely,

Anastasia Glikshtern

San Francisco, CA 94122

From: [Anne Walker](#)
To: [Farallon Islands Consistency](#)
Subject: use of poison to control rat/mice population
Date: Tuesday, April 20, 2021 9:52:13 AM

To whom it may concern.

I am writing today to ask you reconsider the use of poison to control the rodent population on the Farallon Islands. Poison will have a devastating effect on this entire delicate ecosystem of the Islands. Please do not proceed with this plan and protect our invaluable wildlife.

Anne Walker

From: [Susan Douglas](#)
To: [Farallon Islands Consistency](#)
Subject: Vote against poisoning the Farralon Islands
Date: Saturday, April 10, 2021 4:57:40 PM

As a California resident for half of my life, PLEASE do not allow U.S. Fish & Wildlife to scatter 1.5 tons of bait onto South east Farallon Island.

Surely there's a safer way to solve problems than harming this entire ecosystem. This seems outrageous and I urge you to explore alternatives to the problem of Burrowing Owls and mice.the problem of Burrowing Owls and mice.

Warmest Mahalo and Aloha!

[Susan Douglas](#)
[84A Iliwai Loop](#)
[\(that's spelled I L I W A I\)](#)
[Kihei, Maui, HI 96753](#)
[808 879 1112 \(You can call 24/7, if you get my machine leave a long message.](#)
[NO texts please.\)](#)
[sd3@hawaii.rr.com](#)

From: [Katherine O'Dea](#)
To: [Farallon Islands Consistency](#)
Subject: We stand for poison free sanctuaries
Date: Tuesday, April 20, 2021 5:47:26 PM

Dear CA Coastal Commissioners,

I am writing on behalf of Save Our Shores, a coastal conservation non-profit based in Santa Cruz, Ca, as well as our more than 10,000 constituents, to urge you to deny the U.S. Fish and Wildlife Service (USFWS) from dumping 1.5 tons of poison to destroy the mouse population on the Farallon Islands. The USFWS' strategy is misguided, ill-conceived, short-sighted, and demonstrates a complete lack of ingenuity and creative problem solving.

Not only would such an outrageous plan sicken or kill all wildlife that comes in contact with the poison on the islands, but affected birds may make it to the mainland before dying and be consumed by other wildlife who in turn may become seriously ill or die. It boggles the mind to think that such a plan could be under consideration at all, given that the Farallon Islands are in a National Marine Sanctuary and that potentially affected birds and other wildlife are within easy reach of a second National Marine Sanctuary, the Monterey Bay National Marine Sanctuary.

As Coastal Commissioners tasked with protecting California's most treasured asset, you have a duty and responsibility to say NO to the USFWS' preposterous proposition.

Thank you.

Sincerely,

Katherine O'Dea
Executive Director
Save Our Shores



Katherine O'Dea
Executive Director, Save Our Shores
Office: 1.831.462.5660 x8
Mobile: 1.401.640.8213
Website: www.saveourshores.org
Address: 345 Lake Ave, Suite A. Santa Cruz, CA 95062

From: [Greg Menken](#)
To: [Farallon Islands Consistency](#)
Subject: Wildlife poisoning at the Farallone Islands
Date: Monday, April 12, 2021 3:32:06 PM

To Whom it may Concern,

Please act now to stop the US Fish and Wildlife service from poisoning the area around the Farallone Islands to remove burrowing owls. This poison will affect the entire ecosystem. Please support me in finding a more ecological way to control the mice population than a scorched earth approach.

Thank you,you,

Greg Menken

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From: [Diane Gentile](#)
To: [Farallon Islands Consistency](#)
Subject: CCC Agenda Item: Farallon Islands
Date: Thursday, April 8, 2021 7:59:10 PM

Dear California Coastal Committee Members,

The Farallon islands represent a rarity of relatively untouched nature just off our coastline. Scientists agree that these islands provide a critical refuge for wildlife and particularly seabird migrations.

It has come to the public's attention that the US Fish and Wildlife has once again proposed a plan to scatter 1.5 tons of cereal bait into Farallon Islands to solve the problem of Burrowing Owls from coming to the island from Marin Headlands. This kind of poisoning of our wildlife has got to end. There is no sound scientific basis for using poisons in such an uncontrolled natural setting and clearly the unintended results can and have in the past been disastrous to all varieties of wildlife. We must move beyond antiquated approaches and look forward to new methods of working with rather than against nature.

The future wellbeing of this fragile ecosystem and the interconnected chain extending from the Farallones along the coastline are being endangered by such a reckless and unfounded proposal.

Please do not permit the U.S. Fish & Wildlife Service to move forward with this or any similar plan that threatens to destroy our precious marine sanctuary.

Thank you for your consideration and for your good service.

Sincerely,

Diane Gentile

From: [Dee Swanhuysen](#)
To: [Farallon Islands Consistency](#)
Subject: Don't allow USFW to poison the Southeast Farallon Island
Date: Wednesday, April 7, 2021 8:40:33 AM

Don't allow USFW to poison the Southeast Farallon Island.

Please send email me what you decide to do. Dee Swanhuysen

1800 Jonive Rd,
Sebastopol, CA 95472

Three percent of Earth's land mass is comprised of islands, but 95 percent of all bird extinctions have occurred on them. Main cause: Mice and rats introduced by humans.

Only 10 percent of the world's islands are rodent-free, but a rodenticide called brodifacoum is changing that. On hundreds of treated islands recovery of native plants and wildlife has been swift and spectacular.

Consider rugged, 1,450-square-mile South Georgia Island in the Subantarctic. Before mice and rats disembarked from whaling vessels it had been Earth's richest seabird rookery. For three years it's been rodent free thanks to a \$13.5 million project in which brodifacoum was applied by helicopters. All 33 bird species are surging back. South Georgia pipits, for example, had been virtually eliminated; now their vocalizing drowns out the roaring of elephant seals.

On the Farallon Islands National Refuge, 27 miles off San Francisco, mice introduced by sealers threaten to extirpate 4000 ash storm-petrels – half the planet's population. In autumn the ground undulates with mice. Sit down, and they crawl all over you.

Before mice infested the refuge burrowing owls rested briefly on their fall migration. Now they linger into winter, gorging on mice. With seed shortage mice turn to cannibalism, then starve, so owls switch to ash storm-petrels. Enough mice survive that their population explodes again when new seeds appear.

Meanwhile mice expose sea lions and seals to deadly pathogens, spread seeds of invasive plants, devour pollinators of native plants and consume two rare species found nowhere else – Farallon camel crickets and Farallon arboreal salamanders.

Since 2004, the U.S. Fish and Wildlife Service has tried to restore ecological health to the Farallons, but it's continuously intimidated by opponents of all poisons in all situations.

To restore island ecosystems brodifacoum applied by trained wildlife professionals is an absolute necessity. But brodifacoum abused by the public is an absolute disaster for mainland ecosystems. These are two thoughts opponents of island recovery can't grasp simultaneously.

Animal-rights activist Maggie Sergio proves the old saw that one concerned citizen can make a difference. She proves also that this isn't always a good thing.

Sergio has whipped the City of San Francisco, the California Coastal Commission and the public to a froth of fear and loathing. Her online petition against the project has 39,000 signatures.

Sergio's screeds in the Huffington Post and elsewhere include such fiction as: "1.3 metric tons of brodifacoum" will be dropped by helicopter. There isn't enough brodifacoum in the world to drop 1.3 metric tons; 1.54 ounces would be dropped, this to be mixed with 1.3 metric tons of grain. And: "The pesticide label for 'Brodifacoum 25' indicates that up to 24 pounds per acre will be applied." No, "Brodifacoum 25" contains 25 parts brodifacoum per million parts grain.

These and other untruths are recycled by the media, the Coastal Commission, the city, WildCare and the Ocean Foundation. One might suppose that the foundation would defend ocean mammals and rare ocean birds. Instead it frets about imagined cruelty to mice and possible by-kill of super-abundant western gulls.

The Fish and Wildlife Service doesn't need permission from state bureaucrats to manage wildlife belonging to all Americans. But scolded by the Coastal Commission, it's re-revising plans it has revised and re-revised for 17 years.

Zach Warnow of Point Blue Conservation Science retains hope: "I don't think we'll win over opponents; but we'll get this message to the undecideds: We're in a time when people are doubting scientists, and we need to get back to trusting the

scientific process that's been so well represented in this project."

The Service will again plead its case to the Coastal Commission at a hearing tentatively scheduled for May. Comments should be sent to:

farallonislands@coastal.ca.gov

Ted Williams is a contributor to Writers on the Range, writersontherange.org, a nonprofit dedicated to spurring lively conversation about the West. He writes about wildlife for national publications.

Mark Massara
Attorney at Law
1642 Great Hwy
SF CA 94122
Ph: 805 895 0963
markmassara@coastaladvocates.com

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From: [Kendrick Miller](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon island proposed bait drop
Date: Wednesday, April 7, 2021 9:26:08 AM

The ecocidal idiot at the US Fish and Wildlife Service that planed to drop poison bait on the Farallon Islands needs to be arrested and incarcerated for decades, if not life. And the Service must reform its conservation and ecological stupidity.

Kendrick Miller

From: [Judith Newton](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands management
Date: Thursday, April 8, 2021 8:08:09 AM

To whomever is making these decisions:

If you would like to control the mice populations on the islands, please DO NOT USE THE POISON dropped from helicopters.

In mid-May, when you are to be considering this decision, find a path that works in concert with the natural systems rather than a blunt and devastating instrument like the poison.

I trust you can connect with the wiser parts of yourselves.

cheers,
Judith

From: [Candy Girard](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands poison drop must stop
Date: Wednesday, April 7, 2021 10:03:40 AM

To whom it may concern,

The poison drop at the Farallon Islands, scheduled in May must not happen. This poison is devastating to all wildlife. There are better solutions than poisoning everything.

Cassandra Girard
PO Box 336
Bodega Bay, CA
Candykishi@gmail.com

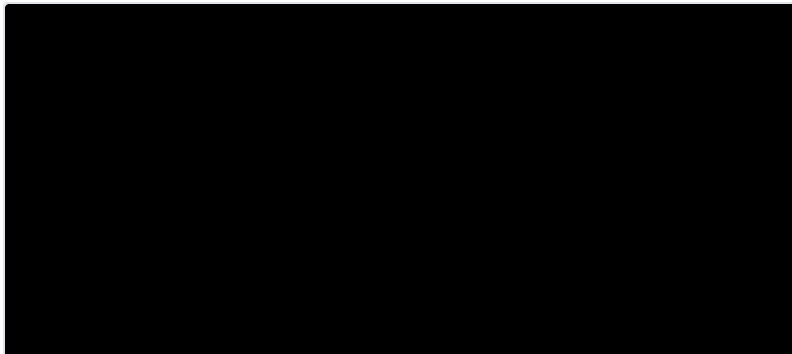
From: [Deby Hodges](#)
To: [Farallon Islands Consistency](#)
Subject: Farallon Islands Toxic Food Drop
Date: Wednesday, April 7, 2021 3:11:57 PM

The current plan to drop toxic food to eliminate mice is/will be detrimental to all other bird/animal life that also exists on the island. There are other non lethal methods to reduce the mice population and I encourage you do to the research and find something that is beneficial to your plans and doesn't harm other wildlife.

Thank you,

Debra Hodges
Newton, NC 28658

[Poison Free Sanctuary - YouTube](#)



Poison Free Sanctuary

From: [Margo Wagner](#)
To: [Farallon Islands Consistency](#)
Subject: Farallones Comments
Date: Thursday, April 8, 2021 3:05:51 PM

Hello,

My name is Margo and I am an avid surfer, backpacker and nature-lover in the bay area. I have recently learned of the plans to scatter 1.5 tons of poisonous bait to control burrowing owls. I am asking to please do NOT drop poisoned bait on the Farallones.

It is my hope that an alternate solution is found that does not involve putting poison in this important natural ecosystem.

Best,

Margo Wagner

From: fedexxit@aol.com
To: [Farallon Islands Consistency](#)
Subject: Fwd: Please share this important PSA
Date: Wednesday, April 7, 2021 11:49:08 AM

OOMG! PLEASE don't drop poison on Farallon Islands! Most foolish action that can be taken. LISTEN to those who know and do NOT take the easiest, most destructive pth possible. Didn't CA just BAN rat poisons to protect mountain lions and other predators?! STOP the (asinine) drop! ~Marielle Marne & Steven Moore, neighbors to the east in AZ

neighbors to the east in A

From: [Tracy Pierce](#)
To: [Farallon Islands Consistency](#)
Subject: mice poisoning
Date: Thursday, April 8, 2021 12:04:38 PM

I don't have all the info re why, but helicopter spread mouse poison to keep owls from flying many miles seems pretty ridiculous. Aren't owls better mouse control than poison?

Please do the right thing. Or do nothing. don't do the wrong thing!

Tracy Pierce
94080
415-517-7175

From: [Karin Faulkner](#)
To: [Farallon Islands Consistency](#)
Subject: NO DUMPING POISON ON FARALLON ISLANDS
Date: Thursday, April 8, 2021 4:42:03 PM

An alternative must be used which will not poison the entire unique and precious ecosystem!! This is an unconscionable plan. Toss it !!

K. Faulkner
Mendocino Ca.

From: [Sally Stephens](#)
To: [Farallon Islands Consistency](#)
Subject: No helicopter-sprayed rodenticides on Farallons
Date: Thursday, April 8, 2021 11:04:08 AM

California Coastal Commission,

Please do not allow US Fish and Wildlife Service to spray 1.5 tons of rodenticides from helicopters on the Farallons. The plan to stop a few burrowing owls from coming to the islands to eat mice will upset the ecological balance on the islands. Other places around the world where similar rodenticide-drenching plans have been used rarely see the desired impact. Other species die, causing a cascading negative impact on the ecology of the islands, not the simple desired result intended. Unintended consequences are real and cause new problems that are not easily addressed. Do not allow this plan to go forward. Keep the Farallons free of indiscriminately sprayed rodenticides.

Sally Stephens
San Francisco

From: [Katharina Sandizell-Smith](#)
To: [Farallon Islands Consistency](#)
Subject: No Toxic Drop on Farallon Islands
Date: Wednesday, April 7, 2021 10:59:04 PM

To Whom it May Concern,

Please do not drop poison on the Farallon Islands.

This is clearly not the best , most intelligent option as it does not use targeted technology and thereby poisons the entire ecosystem.

Please stop this toxic practice.

Thank you,

Katharina Sandizell / Point Reyes Station

From: [Carol Goodwin Blick](#)
To: [Farallon Islands Consistency](#)
Subject: permit hearing re. poison bait on the Farallons
Date: Thursday, April 8, 2021 2:05:13 PM

To the California Coastal Commission:

It would be nuts to introduce poisoned bait to the Farallons to stop mainland owls from eating Farallons mice. West Coast Owls have been eating mice, wherever they can find them, for as many thousands of years as there have been owls and mice living here.

Any attempt to micromanage which owls may eat which mice will have unintended consequences.

Speaking to the permit request:

1. Like the rest of coastal California, the Farallons are already dealing today's mix of ubiquitous environmental toxins.

The only reasonable excuse to intentionally introduce another toxic chemical into the Farallons ecosystem might be to directly preserve human life and health. That is not the case here.

2. The use of U.S. Fish and Wildlife Service helicopters would create its own ecological damage, both on the Farallons' ecosystem, and in unnecessary use of fossil fuel.

Just because something can be done doesn't mean it should be.

Poisoning even this small, remote part of our environment would be ill-considered overreach.

3. Please deny the U.S. Fish and Wildlife Service permit request re. the Farallons.

Thank you.

Carol Goodwin Blick
426 Floral Way
Rohnert Park, CA 94928

From: [Maria Ford](#)
To: [Farallon Islands Consistency](#)
Subject: Please do not drop the poison!
Date: Wednesday, April 7, 2021 3:27:10 PM

The controversial second-generation anticoagulant poison being proposed for use in the Sanctuary is the subject of increased scientific scrutiny and public concern because of its documented association with the vast amount of unnecessary killing of non-target wildlife during similar air drops on island locations elsewhere, an impact called “bykill”. The State of California has outlawed retail sale of the same toxic compound due to the unintended damage inflicted on eagles, hawks, mountain lions, foxes, bobcats, an iconic mammal called the Pacific Fisher, and, in terrestrial urban interface locations, the danger of accidental poisoning of domestic pets and even small children. Legislation limiting the use of this poison is now moving through the California State Legislature as a two-year bill. Some within the Wildlife Service admit that large numbers of gulls ingesting the poison pellets offshore during a helicopter drop can be expected to return to die in mainland locations these birds frequent, such as at Fishermen’s Wharf. EPA officials have raised similar concerns about the carcasses of poisoned Western Gulls that would inevitably wash ashore or die on our coastal beaches that will then need to be handled with special precautions as hazardous materials. Any accidental wind- or wave-borne discharges of the poison into the ocean also pose a contamination hazard to fish, crabs, and abalone, putting the fishing industry and our local economies at risk.

Sent from my iPad

From: [Annette Jarvie](#)
To: [Farallon Islands Consistency](#)
Subject: Please don't poison!
Date: Thursday, April 8, 2021 8:38:09 AM

To the California Coastal Commission:

I am writing to express my great alarm that there is a plan afoot to spread poison at the Farallon Islands to deter Burrowing Owls that eat mice there. It seems a greatly misguided attempt, and could alter the ecosystem of this great California sanctuary for decades to come. I am opposed to this "remedy" and suggest other means can be found to resolve this "problem."

Thank you for protecting the Farallon Islands Sanctuary.

Annette Jarvie
Mendocino, California

From: [Michelle Irwin](#)
To: [Farallon Islands Consistency](#)
Subject: Please No Rodenticide on the Farallon Islands
Date: Wednesday, April 7, 2021 7:48:20 PM

To the Powers that Be,
To the Deciders,
To CA Fish and Game,

For habitat preservation of coastal wildlife....

Let's not make this environmental mistake of using poison to limit the rodent population on the islands. We are smart people with resources and intelligent, scientific capabilities... Please let's reconsider this plan!!! There are too many sensitive nature webs of wildlife that will be affected through the food chain, the water sources and animals ingested by predators. We have the opportunity to make wiser decisions. The affects for this plan cannot be overstated. Please find alternatives to control of the rodent population on the Farallon Islands.

Imploring you to halt this dangerous plan,

Sincerely,

Michelle K Irwin

From: [Carol Sklenicka](#)
To: [Farallon Islands Consistency](#)
Subject: Please stop poison drop on Farallon Islands
Date: Wednesday, April 7, 2021 2:40:30 PM
Importance: High

Dear Coastal Commissioners,

Please prevent Fish & Game agencies from dropping rodenticides on the Farallon Islands where the poisons will affect seabirds and the rest of the wildlife in the area. There are better ways to control the rodent population.

Carol Sklenicka
Jenner CA

From: gyork@mcn.org
To: [Farallon Islands Consistency](#)
Subject: poison bait?
Date: Thursday, April 8, 2021 8:02:18 AM

Please consider the great detriment of dumping poison on the Farallons.
Surely you have an idea of the great harm that would result.
gyork
4.8.2021

From: [Stephan Orme](#)
To: [Farallon Islands Consistency](#)
Subject: Poison baits not appropriate for Farallon Island
Date: Thursday, April 8, 2021 7:28:53 AM

There has to be a better way, dropping a ton of poison bait across a wildlife sanctuary is just dumb.

Thank you.
-Steve Orme
Berkeley, Ca

From: [christine hoex](#)
To: [Farallon Islands Consistency](#)
Subject: Poison Drop on the farallon Islands
Date: Thursday, April 8, 2021 10:12:17 AM

To Staff at Farallon Islands and the California Coastal Commission.

I am calling into question the practice of dropping poison cereal on the Farallon Islands to reduce or eliminate the borrowing owls who prey on the rodents. The population control of rodents and the protection of the Ashy Storm Petrel can be achieved in other safer ways. There are other dangers to the Ashy Storm Petrel that are invasive human elements, such as feral cats, (perhaps not on the Farallons) and night time illumination from boats. To add toxic cereal pellets into the food chain is dangerous and difficult to control. Also the waste of resources and carbon pollution from helicopter trips when considering the misguided technique of poisoning the food chain at the Farallon Islands is wrong.

Please stop this misguided practice.

Thank you for your attention to this issue.

Respectfully,
Christine Hoex
Santa Rosa Ca

From: [Diana Bundy](#)
To: [Farallon Islands Consistency](#)
Subject: Poison dumping on Farallon Islands
Date: Wednesday, April 7, 2021 3:49:37 PM

Please Please Please DO NOT poison the sea life in our marine habitat. How this ill conceived idea got to this point is unconscionable. Please DO NOT drop tons of poison on the Farallon Islands.

Bundy's
Bodega Bay
Bay

From: jmcorby1@aol.com
To: [Farallon Islands Consistency](#)
Subject: Poison Free Sanctuary
Date: Thursday, April 8, 2021 10:37:31 AM

Please do not drop poison on the Farallon Islands to kill the mice and ultimately, the owls. This is not the way to solve the problem. Please find a solution that does NOT involve poisoning the eco-system there.

Thank you,

Janette Corby
510.220.2725

From: [Martha Hall](#)
To: [Farallon Islands Consistency](#)
Subject: Poisoning Islands is Wrong
Date: Wednesday, April 7, 2021 11:22:09 AM

Topic: USFWS's use of poison to discourage predation on the Farallon Islands
To: California Coastal Commission,
From: Martha Hall (pondfrog.mh@gmail.com)

Dear Members of the California Coastal Commission,

Like many people, I understand and appreciate the importance of the Farallon Islands for seabird nesting and survival. I am very interested in protecting seabirds and I support many efforts to improve island habitats for birds such as removing non-native species such as goats or sheep or rats.

However, I strongly oppose USFWS's use of poison on the Farallon Islands. To poison a wildlife refuge as unique and fragile as the Farallon Islands is extremely disturbing. Poison is indiscriminate in what species it kills. This is why many of us usually oppose its use anywhere. My guess is that the USFWS has very little idea just what species will eat and die from the poison. Experimenting to find out should not be allowed. Taking a chance should be illegal. Who knows what birds might pick up the bait, especially if food is scarce and especially for juveniles? Most baits attract a wide range of species for various reasons.

If the goal is to discourage or get rid of burrowing owls, which are also a species of concern, this really does not make sense. How many burrowing owls have moved to the Farallon Islands? I cannot find this number. And why does USFWS believe this species of owl will become a problem that is serious enough to require killing owls? It seems like seabirds have lived with burrowing owls for thousands of years along the coast of California. What studies suggest the two have mixed on the Farallon Islands and/or that this is an important issue for seabirds?

The quantity of poison is also disturbing. As is the length of time the poison is active and killing indiscriminately. Removal would be next to impossible if and when something goes wrong and something may go terribly wrong.

The USFWS has a history of managing wildlife that is based on single species and that is focused on use of techniques that are highly questionable. The public has little oversight on its practices. I hope you, our members of the California Coastal Commission, will provide the necessary oversight on the use of huge amounts of indiscriminate poison on the Farallon Islands.

From: [Bob Shavelson](#)
To: [Farallon Islands Consistency](#)
Subject: Poisoning the Farrallons
Date: Wednesday, April 7, 2021 9:43:06 AM

Dear Coastal Commission -

Please reject the proposal to dump toxics around the Farrallons. There are better and safer ways to eradicate rodents that attract other predators.

Where I live in Alaska, the US Fish & Wildlife Service has successfully removed rats from islands in the Alaska National Maritime Wildlife Refuge without the use of broad spectrum toxics.

Of course the use of rodenticides can and likely will have peripheral impacts. But on balance, targeted eradication is wholly better for the entire ecosystem than indiscriminate applications of toxics.

If USFWS can do it here, they can do it in the Farrallons.

Thank you -

Bob Shavelson
Homer, Alaska

From: [Sue Parsons](#)
To: [Farallon Islands Consistency](#)
Subject: Stop Farallons poison bait plan, find a better way
Date: Thursday, April 8, 2021 8:56:20 AM

Dear Coastal Commissioners,

Spreading poison bait by helicopter on the Farallons to kill mice that attract owls is destined to produce awful unintended consequences. Please reconsider.

Instead of poisoning the islands' food chain, US Fish & Wildlife must rather find a less lethal/more targeted way to fix the problem--i.e. a better mousetrap. I have faith in the federal agency's scientists to access & use better science.

I urge you to stop Fish & Wildlife's "nuclear option." Please use your power to protect this rare California ecosystem at a time of rapid extinction.

Susan Parsons
647 Grotzman Rd
Arcata CA 95521--

"A book, too, can be a star, explosive material capable of stirring up fresh life endlessly, a living fire to brighten the darkness, leading out into the expanding universe." - Madeleine L'Engle

From: [Clarice Hearne](#)
To: [Farallon Islands Consistency](#)
Subject: Stop mouse poison plan
Date: Thursday, April 8, 2021 8:47:16 PM

To: Coastal Commissioners

I just learned of the US Fish and Wildlife Service plan to drop poison bait for mice by helicopter on the Farallons Islands. This method of controlling the mouse population is likely to produce unintended negative consequences to the islands' ecosystem and food chain. I ask you to urge the Fish and Wildlife Service to employ a more targeted, less destructive method of managing the mouse population.

Please use your power to protect this rare California ecosystem at a time of rapid extinction.

Clarice Hearne
Chicago, IL 60640

From: [Caiti Waks](#)
To: [Farallon Islands Consistency](#)
Subject: STOP Poisoning the Islands
Date: Wednesday, April 7, 2021 5:20:37 AM

This email is to urge the U.S. Fish and Wildlife Service to NOT use poison to the control mice on the Farallon Islands.

Caiti Waks, Esq.

From: [Laura Morgan](#)
To: [Farallon Islands Consistency](#)
Subject: Stop the poison drop, PLEASE.
Date: Wednesday, April 7, 2021 8:17:10 AM

Esteemed Commissioners,

Please reject the US Fish and Wildlife plan to drop rodenticides on the Farrallon Islands. It is clear that all other wildlife in the area will die or be sickened as a result.

Please demand less harmful means (eg, hormonal rodent population control) to address this important issue in a fragile setting.

Sincerely,

Laura Morgan and James Seward, MDs
Oakland and Sebastopol, CA

From: [Gayle Cerri](#)
To: [Farallon Islands Consistency](#)
Subject: Toxic Poison Drop- Please Stop
Date: Thursday, April 8, 2021 9:45:45 AM

California Costal Commission Board:

Please stop the U.S. Fish and Wildlife Service from conducting a toxic poison drop at the Farallon Islands. This cannot be the most viable answer in 2021 to control mice fertility. We don't need to kill off an entire ecosystem to prevent the breeding of mice.

Thank-you-
Gayle Cerri
39 Partridge Dr.
Novato, CA. 94945

From: djliz@mcn.org
To: [Farallon Islands Consistency](#)
Subject: US Fish & Wildlife poison drop
Date: Wednesday, April 7, 2021 10:57:41 PM

Dear Coastal Commissioners,

The plan to drop poison bait to kill mice that attract owls to the Farallons would be mindless shortsightedness with predictably dire unintended consequences.

Rather than spread toxicity throughout the islands' food chain, US Fish & Wildlife must be directed to find a less lethal/more targeted solution to the current imbalance--i.e. a better mousetrap. I have no doubt this federal agency has the resources to access & apply better science.

I urge you to prevent Fish & Wildlife from foolishly deploying their "nuclear option." I charge you to use your power to protect a rare California ecosystem at a time of accelerating extinction.

Liz Helenchild
Box 1276
Mendocino CA 95460