CALIFORNIA COASTAL COMMISSION
455 MARKET STREET, SUITE 228
SAN FRANCISCO, CA 94105-2219
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Th11b

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE

Received between

November 24, 2021 and December 8, 2021

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CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:
Letters from Elected
Officials and Organizations

Lynn Woolsey

December 6, 2021

Commissioner Steve Padilla, Chair
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Via email to Cassidy Teufel at cassidy.teufel@coastal.ca.gov and all Commissioners, as well as to EORFC@coastal.ca.gov

Re: CD-0006-21 (Oppose)

Dear Chairman Padilla and Commissioners:

Dear Commissioners:

As you know, I served for twenty years in the US House of Representatives, a large part of which was spent working to protect and expand our Greater Farallones National Marine Sanctuary. The protections afforded by this Marine Sanctuary, which includes a unique prohibition against pollutants that may "enter and injure" any of the fragile Sanctuary resources, even from outside of its boundaries, rank this place among the most carefully-protected ocean waters on Earth. The State of California has also proudly implemented two state Marine Protected Areas adjacent to the Southeast Farallon Island, and the entire surrounding region lies within a UNESCO International Biosphere Reserve. I ask each of you, as Coastal Commissioners, not to support the misguided proposal to use helicopters to spread a ton-and-a-half of poison on the Southeast Farallon Island. Not only does such a risky plan run completely counter to California's Coastal Act, but it would clearly violate the public trust under which our Greater Farallones Sanctuary was created and is managed. I'm certain that in the 21st century, we can surely find better solutions to the problem.

Sincerely,

Lynn Woolsey

Member, Board of Supervisors
District 1

City and County of San Francisco

CONNIE CHAN
陳詩敏
第一區市參事

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

RE: Support for Farallon Islands Mouse Eradication Plan

Dear Commissioners,

As San Francisco's District One Supervisor, of which the Farallon Islands are a part of, I am writing to request that you 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.

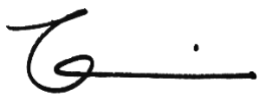
The introduction of invasive house mice to the Farallon Islands has caused significant obstruction to the islands' sensitive ecosystem. The house mice have direct and indirect harmful impacts on the islands' breeding seabirds, especially ashy storm-petrels, but also on Leach's storm-petrels, as well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

For the ecosystem to be restored, we must completely eradicate the house mice on the Islands. The survival of even a single pair of mice jeopardizes the whole project, as the mouse population can recover incredibly quickly.

The plan proposed by the US Fish and Wildlife Service has proven effective for restoring the Island's ecosystem, 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,



Connie Chan

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COUNTY OF MARIN

BOARD OF SUPERVISORS
JUDY ARNOLD
Fifth District

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JArnold@marincounty.org
www.marincounty.org/bos

December 8, 2021

Steve Padilla, Chair
California Coastal Commission
455 Market Street
San Francisco, CA 94105

RE: Agenda Item Th11b-CD-0006-21

Dear Chair Padilla:

I am writing in support of a finding that the US Fish and Wildlife Service's Plan to remove non-native house mice from the Farallon Islands is consistent with the California Coastal Management Program (CD-0002-19) because it will restore the islands to a more natural state.

The introduction of invasive, non-native house mice to the Farallon Islands has caused significant disturbance to the islands' sensitive ecosystems. The house mice have direct and indirect harmful impacts on the islands' breeding seabirds, 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 islands 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,

Judy Arnold
Marin County Supervisor, District 5

County of Santa Cruz

BOARD OF SUPERVISORS

701 OCEAN STREET, SUITE 500, SANTA CRUZ, CA 95060-4069
(831) 454-4130 FAX: (831) 454-3262 TDD/TTY - Call 711

JOHN LEOPOLD	ZACH FRIEND	RYAN COONERTY	GREG CAPUT	BRUCE MCPHERSON
FIRST DISTRICT	SECOND DISTRICT	THIRD DISTRICT	FOURTH DISTRICT	FIFTH DISTRICT

July 15, 2020

California Coastal Commission
45 Fremont Street
San Francisco, CA 94105

Dear Commissioners:

In June of 2019, I submitted a letter requesting that the Commission deny a federal consistency review finding for the Farallon Island mouse eradication project, CD-0002-19. Since then I have had the opportunity to speak with scientists and conservation groups to learn more about the project and would like to remove my opposition to the consistency finding request.

After learning more about the project, I realize that the proposed methods have been used successfully and safely hundreds of times to restore island ecosystems in California and elsewhere, including on Anacapa Island in Channel Islands National Park. I also understand that the proposed project would be a one time, highly regulated use of a second generation anticoagulant. This use is consistent with California Bill AB 1788, which bans the indiscriminate use of second generation anticoagulant rodenticides on the mainland, but makes a provision for their use on islands to protect California's unique island ecosystems from nonnative invasive species, such as the house mouse on the Farallon's, while being guided by Federal and State Environmental Impact laws.

I have been very concerned about the use of anti-coagulants in my district in Santa Cruz County and their impact on wildlife, in the context of this proposed use however, the project will be using anticoagulants to protect and balance wildlife in one of our most cherished and beautiful marine environments.

If you have questions or would like to discuss the matter with me, please do not hesitate to call my office.

Sincerely,

RYAN COONERTY, Supervisor
Third District

CC: Brad Keitt, American Bird Conservancy
Dan Croll, UCSC

BirdLife INTERNATIONAL

Partnership for nature and people

California Coastal Commission
45 Fremont Street,
Suite 2000 San Francisco,
CA 94105-2219
8th December 2021

RE: Southern Farallon Islands Mouse Eradication

Dear Commissioners,

BirdLife International strongly supports the proposal to eradicate the house mouse from the Southern Farallon Islands. As you will be aware, the islands are internationally important for 50% of the world population of Ashy Storm Petrel and at least four other globally important marine bird populations. Studies have established that the invasive house mouse has a direct and indirect impact on native island fauna and flora particularly small ground nesting seabirds including storm petrels and well as on salamanders, reptiles, invertebrates and plants that occur within the Wildlife Refuge.

The use of rodenticides and specifically second-generation anticoagulants like Brodifacoum are effective and indeed necessary for the successful (100%) removal of a house mouse population. BirdLife has successfully removed rodents from 40 Pacific Islands (and many more worldwide) using aerial, hand broadcast and bait station techniques. Best practice is now well established, and routinely deliver a high rate of success including the safe management of non-target species and human health. The approach and precautionary needs set out for the Farallon Islands in the Environmental Impact Statement (FEIS) is consistent with best practise.

Monitoring following rodent eradication operations in the Pacific has shown increases in seabird and land bird populations and wider ecosystem benefits. It is our experience that the operation proposed for the Farallon Islands will have significant benefits for biodiversity and the resilience of island ecosystems and we wish the proponents success with this venture.

Yours sincerely

Richard Grimmett

Richard Grimmett
Director of Conservation

BirdLife International
The David Attenborough Building
Pembroke Street, Cambridge
CB2 3QZ, UK

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E: birdlife@birdlife.org
www.birdlife.org

Agreement on the Conservation of Albatrosses and Petrels

8 December 2021

TO: California Coastal Commission (farallonislands@coastal.ca.gov)

RE: Agenda Item Th11b-CD-0006-21 (South Farallon Islands Mouse Eradication Project)

Dear Sir/Madam

I am writing to you about a proposal currently before the Commission to eradicate invasive house mice from the South Farallon Islands.

The Agreement on the Conservation of Albatrosses and Petrels (ACAP) is a multilateral agreement which seeks to conserve albatrosses and petrels by coordinating international activity to mitigate known threats to their populations. ACAP currently covers 31 species of albatrosses, petrels and shearwaters. Predation and habitat degradation by introduced vertebrates are the main threats facing these and other seabird species at their breeding sites. ACAP therefore welcomes pest eradication programmes that protect seabirds and restore natural ecosystem processes.

The last several years in particular have seen successful eradication programmes from large and topographically challenging islands. New Zealand's project to eradicate mice on subantarctic Antipodes Island was formally declared a success in 2018. Australia has completed field operations for its Lord Howe Island Rodent Eradication Project, now awaiting the final report of its success. In the South Atlantic, the UK's Gough Island Restoration Programme completed the aerial bait drop on the island earlier this year; to date no further signs of mice have been reported. All three islands are World Heritage Sites with endemic populations of sea and land birds, as well as other flora and fauna. South Africa's Mouse-Free Marion Project is also advancing its planning to eradicate Marion Island's house mouse in 2024 – the largest island on which such an eradication will be attempted anywhere in the world. These successful, ongoing and planned eradications inform further operations of this kind, such as the one proposed for the South Farallon Islands.

It is very encouraging to see resources being dedicated to programmes such as the South Farallon Islands Mouse Eradication Project, including the preparation of a comprehensive and scientifically rigorous Final Environmental Impact Statement, which benefits from the

experience of successful invasive rodent eradications on nearly 700 islands worldwide. The international seabird conservation community will be looking forward to the outcomes of this project.

Yours faithfully

Dr Christine Bogle
Executive Secretary
Agreement on the Conservation of Albatrosses and Petrels

December 8, 2021

Email: EORFC@coastal.ca.gov

Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

RE: Support for the U.S. Fish and Wildlife Service South Farallon Islands Invasive House Mouse Eradication Project: Farallon Islands NWR CD-0006-21

Commissioners,

Golden Gate Audubon Society strongly supports the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project. Golden Gate Audubon Society represents 10,000 members and supporters around the Bay Area who are dedicated to the protection of birds, wildlife, and their habitats.

The USFW plan is the only scientifically proven method to eradicate the invasive house mouse from the South Farallon Islands. It's targeted use of rodenticide is thoroughly researched and tailored to reduce all unnecessary harm to other wildlife on and around the islands. All possible alternatives have been tried or studied. The process outlined in their plan has been used on other islands successfully, and with minimal harm to other wildlife. The house mice were brought by humans, and are now threatening the existence of entire species which rely on the Islands for foraging and breeding territory. We have a responsibility to undo the ecological imbalance we have created.

The Farallon Islands are an ecological treasure. They host the largest breeding colony of Brandt's Cormorants and Western Gulls in the world. Ashy Storm-petrel, Common Murre, Pigeon Guillemot, Rhinoceros Auklet, Cassin's Auklet, Tufted Puffin, and Brown Pelican also rely on the Farallones for breeding habitat. Marbled Murrelet, Black-footed Albatross, and Sooty Shearwater forage in the waters surrounding the island.

Most seabird species are experiencing declines due to human disturbance of their feeding and breeding grounds, but the Ashy Storm-petrel are in particular peril due to the ecological imbalance created by the house mice on the Farallones. The house mouse populations naturally fluctuate, when their numbers are high it attracts Burrowing Owls to the Islands. While Burrowing Owls are also a threatened species, they are not naturally found on the Farallones. When the house mouse populations dip, the Owls begin feeding on the Ashy Storm-petrel and other chicks. Ashy Storm-petrels are very slow breeders, producing only

GOLDEN GATE AUDUBON SOCIETY
2530 San Pablo Avenue, Suite G Berkeley, California 94702 *phone* 510.843.2222
fax 510.361.0140 *web* www.goldengateaudubon.org

one egg per year. They have no natural defenses to this predation, as this new food web was created too fast to allow the birds to adapt. Without intervention, the Ashy Storm-petrel will be permanently extirpated from the island, leading to the extinction of the species. There are estimated to be only 10,000 individual Ashy Storm-petrel left in the world, and half of those nest on the Farallones.

Scientists at Point Blue Conservation Science determined that eradication of the house mouse will allow the Ashy Storm-petrel populations to rebound. Their peer-reviewed findings were published in Ecosphere in 2019, and the full article can be found here.

The USFW eradication proposal outlines a plan to capture and remove the Burrowing Owls before the application of rodenticide, as well as procedures to keep all other birds off the island while the rodenticide is still chemically harmful. The proposal also calls for physical removal of the rodent carcases so no unintentional harm will be done to scavengers upon return to the island.

The house mouse populations are at plague levels. We at Golden Gate Audubon do not take lightly the use of rodenticide, but we have determined through rigorous scientific study that this is the only way to correct the harm we have caused in bringing mice to the island. The harm to individual rodents must be balanced with the threat of permanent extinction of entire species.

We hope you will consider the decades of scientific evidence and thorough planning which has gone into the USFW proposal, and approve the project.

Thank you,

Glenn Phillips

Executive Director

CALIFORNIA INSTITUTE
OF ENVIRONMENTAL STUDIES

P.O. Box 1185
Davis, CA 95617
(530) 400-1512

December 7, 2021

Dear Commissioners,

I am writing on behalf of the California Institute of Environmental Studies (CIES) in support of the U.S. Fish and Wildlife Service's project to eradicate introduced, invasive house mice at the Farallon National Wildlife Refuge. CIES is a California-based nonprofit organization with over 40-years' experience advancing the conservation of coastal and marine birds and healthy ecosystems in the Pacific region through sound science, restoration, partnerships, and community outreach. We ask the Commissioners to agree with your staff's recommendation and concur with the Service's consistency determination (TH11b-CD-006-21).

This eradication project was carefully studied for over 10-years and as a result, it is well designed selecting a "preferred alternative" that uses the only known method proven effective for eradication of rodents on islands. The implementation of this project will help restore and improve ecosystem functions within the environmentally sensitive habitat at the Farallones, once 100% of the house mice have been eliminated. The eradication of the house mouse population will have benefits to many native species utilizing these islands.

We would like to highlight the importance of this project to one rare seabird species, the ashy storm-petrel. Our organization has been actively involved in studying and researching this species in California and Baja California for over a decade. In September 2016, we spearheaded an effort, with input from the world's leading ashy storm-petrel experts, to develop a Conservation Action Plan for this species that included conservation objectives and actions most important to help ensure the long-term viability of the ashy storm-petrel.[1] The U.S. Fish and Wildlife Service's mouse eradication project was ranked as the most important project to be implemented for this species. The U.S. Fish and Wildlife Service and Point Blue Conservation Science have done an exceptional job of detailing the negative impacts that the house mouse population has had on the ashy storm-petrel populations at the South Farallon Islands. Eliminating the house mouse population will have significant benefits for the declining breeding population of ashy storm-petrels. This is particularly important because roughly 55-60% of all breeding ashy storm-petrels nest at the Farallon Islands.

Furthermore, CIES supports the U.S. Fish and Wildlife Service's plan to eradicate the house mice at the Farallon National Wildlife Refuge because we have documented benefits to seabird

populations as a result of a similar restoration project. As you are probably aware, introduced non-native black rats were eradicated at Anacapa Island in 2002 using similar techniques currently proposed at the Farallones. We carefully monitored and documented the recovery of seabirds at Anacapa Island following the eradication of black rats. Our post-eradication monitoring documented enormous benefits to Scripps's murrelet with murrelet nest numbers and counts of birds increasing approximately four times in just 10-years post eradication.[2,3] In addition, Cassin's auklets and ashy storm-petrels returned to breed at Anacapa after rats, which precluded these birds from nesting on the island, were eradicated.[4,5] This type of success has been documented by others around the world with land managers eradicating house mouse populations from over 60 islands using the techniques proposed for the South Farallon Islands. We believe that the ashy storm-petrel population at the South Farallon Islands will respond in a similar manner after the house mouse eradication is completed.

In addition, over the past 3 years, we have been working collaboratively with the Channel Islands National Park to monitoring ashy storm-petrels nesting at Santa Cruz Island. Due to the unusual nesting habitat used by storm-petrels in sea caves, we have been able to utilize motion-activated cameras to document the direct impact of native deer mice on ashy storm-petrels. Deer mice have been photographed on numerous occasions eating storm-petrel eggs and chicks. In fact, in one series of photos we captured dramatic footage of a pair of mice attacking a nearly fledged storm-petrel chick. It seems likely that the invasive, non-native house mice are having similar direct impacts on the ashy storm-petrel population at the South Farallon Islands.

Thank you for the opportunity to provide comments on this important ecological restoration action. We trust that the California Coastal Commission will understand the benefits of this project, confirm its consistency with several sections of the Coastal Act (e.g., Sections 30240, 30230, 30231, and 30232), and following the best available science when making your decision to concur with the U.S. Fish and Wildlife Service's consistency determination.

Sincerely,

Michael Parker

Michael Parker
Executive Director

---

[1]Parker, M.W. 2016. Conservation action plan for ashy storm-petrels (*Oceanodroma homochroa*) in California and Baja California. Unpublished report, California Institute of Environmental Studies, Davis, California 93 p.

[2]Whitworth, D.L et al. 2005. Initial recovery of Xantus's murrelets following rat eradication on Anacapa Island, California. *Marine Ornithology* 33: 131-137.

[3]Whitworth, D.L. et al. 2018. Population trends for Scripps's murrelet following eradication of black rats. *Journal of Wildlife Management* 82(1): 232-237.

[4] Whitworth, D.L. et al. 2015. Breeding of Cassin's auklets *Ptychoramphus aleuticus* at Anacapa Island, California, after eradication of black rats *rattus rattus*. *Marine Ornithology* 43: 19-24.

[5]Harvey A.L. et al. 2016. Changing breeding status of the ashy storm-petrel *Oceanodroma homochroa* on Anacapa Island, California. *Marine Ornithology* 44: 93-97.

BIRDING — EDUCATION — CITIZEN SCIENCE — HABITAT CONSERVATION

December 1, 2021
Dear Commissioners,

I am writing this letter on behalf of Napa-Solano Audubon, with our over 250 local and 850 National members, in strong support of the US Fish and Wildlife Service's plan to go ahead with the aerial poisoning of the house mouse that has invaded the Farallon Islands and poses great risk to resident breeding Sea Birds. In general, we would not be in favor of using pesticides, however in this case there is an urgent need to eradicate rodents on the Farallons to protect several endangered and sensitive species. We are hoping 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 ashy 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,

Mark Stephenson

Mark Stephenson, President
Napa-Solano Audubon
napabirder@gmail.com
Cell: 707-246-2795

Fostering the protection and appreciation of birds, other wildlife, and their habitats...

SAN DIEGO AUDUBON SOCIETY

December 2nd, 2021

In Support of Farallon Islands Invasive Species Eradication Effort
And the US Fish And Wildlife Service proposal

Dear Honorable Members of the California Coastal Commission:

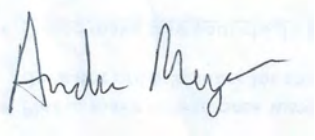
On behalf of the San Diego Audubon Society and our 3,000+ members, I am writing to support the restoration of the Farallon Islands through an invasive species eradication project. San Diego Audubon has been a leader on wildlife conservation and environmental stewardship for over 70 years, and we are highly invested in protecting birds as well as other wildlife, their habitats, and the resources on which they rely. The Farallon Islands support 25% of California's breeding seabirds—300,000/year. This remarkable number is 70% lower than the seabird numbers before human-caused disturbances, including introduced invasive species such as house mice.

I had the great opportunity early in my career to work on the successful eradication project on Anacapa Island in the mid 2000s. That project is a success because of the dramatic increase in nesting success of several seabird species, with other important benefits to native amphibians, mammals, invertebrates and plants. As managers and stewards of California habitats, we choose the long-term benefit over the short-term consequences, and San Diego Audubon Society thinks the Farallon Islands eradication project is exactly one of these situations. The USFWS has created a rigorous EIR and is pursuing the best course of action, with substantial long-term benefits to the Ashy Storm-petrel, Burrowing Owl, Farallon arboreal salamanders, Farallon camel crickets, and several other native species plants and invertebrates.

California has the opportunity to continue to be a world leader on environmental protection and habitat restoration through this project. San Diego Audubon urges you to support the restoration of the Farallon Islands for the long term protection and conservation of our native plants and animals, including especially the birds that need to breed on offshore islands.

Thank you for your attention to this critical issue.

Sincerely,



Andrew Meyer
Director of Conservation
San Diego Audubon Society

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CALIFORNIA
NATIVE PLANT SOCIETY
2707 K Street, Suite 1, Sacramento, CA 95816-5130 (916) 447.2677 www.cnps.org

Protecting
California's native
flora since 1965

December 1, 2021

California Coastal Commission
North Central Coast District
455 Market Street, Suite 300
San Francisco, CA 94105

Submitted electronically to: farallonislands@coastal.ca.gov

Re: Consistency Determination Number CD-0006-21, South Farallon Islands Invasive House Mouse Eradication Project

Dear California Coastal Commission:

Thank you for the opportunity to comment on the South Farallon Islands Invasive House Mouse Eradication Project, Consistency Determination Number CD-0006-21. The following comments are submitted on behalf of the California Native Plant Society ("CNPS"), a non-profit environmental organization with over 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

CNPS is supportive of this project for its benefits to native plants and biodiversity. The Farallones host a unique island ecosystem and CNPS supports actions that will protect and preserve the islands' endemic species, including ongoing monitoring and eradication of invasive species on the islands.

Thank you for consideration of these comments and please reach out if you have any questions.

Sincerely,

Isabella Langone
Conservation Analyst
California Native Plant Society
2707 K Street, Suite 1
Sacramento, CA 95816
ilangone@cnps.org

AMERICAN BIRD CONSERVANCY

Bringing back the birds

30 November 2021

45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219

EORFC@coastal.ca.gov

RE: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Dear California Coastal Commissioners,

We would like to express our support for the project under review by your commission (Agenda Item 11b), Eradication of Mice on South Farallon Islands, Farallon Islands National Wildlife Refuge, San Francisco County. We believe the preferred scenario of aerial broadcast of rodent bait, hand baiting, bait stations, and traps in order to benefit native seabirds is the most feasible and the best possible conservation action to ensure thriving nesting colonies of many species of seabirds, and native invertebrates. In particular, this project will benefit Ashy Storm-petrel, a California designated Species of Special Concern[1].

American Bird Conservancy is a 501(c)(3), non-profit membership organization whose mission is to conserve native birds and their habitats, working throughout the Americas to safeguard the rarest bird species, restore habitats, and reduce threats.

Predation pressure by invasive mammals in limited breeding habitat has become a major factor influencing reproduction and population dynamics for many seabird species. It is recognized that removal of non-native mammals, and rats and mice in particular, from island ecosystems removes the pressure of predation on adults, chicks and eggs[2]. Furthermore, this approach has been tested successfully on over 700 islands around the world.

While American Bird Conservancy's primary interest and mission is related to bird conservation, we acknowledge the benefits of rodent eradication extend to the entire ecosystem more broadly. A recent paper has demonstrated that thriving seabird colonies have flow-on effects to nearshore marine

[1] Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

[2] Jones, H. et al. 2008. Severity of the Effects of Invasive Rats on Seabirds: A Global Review. Biological Conservation. 22 (1): 16-26. https://doi.org/10.1111/j.1523-1739.2007.00859.x

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Tel: 202-234-7181 | Fax: 202-888-7496 | abc@abcbirds.org | www.abcbirds.org

ecosystems, and restoration of island ecosystems can substantially increase productivity and abundances of fishes in adjacent nearshore waters[3].

American Bird Conservancy recognizes that the proposed action would come with risks to non-target species, but these are expected to be minimal, short term and far outweighed by the benefits or removing mice. This has been demonstrated on hundreds of islands around the world, including Anacapa Island off the California coast. American Bird Conservancy did outline our concerns in a letter provided during the EIS public comment period. We believe the Service has done a good job of addressing our comments, and the concerns raised by others.

We support the conclusion that this project will have minimal short-term effects to the marine ecosystem and have multiple-long term benefits to both marine and terrestrial environments. Please contact us if you require further information.

Sincerely,

Brad Keitt
Oceans & Islands Director
American Bird Conservancy
Santa Cruz, CA
831-420-7115

[3] Xosé Luis Otero, Saul De La Peña-Lastra, Augusto Pérez-Alberti, Tiago Osorio Ferreira & Miguel Angel Huerta-Diaz. 2018. Seabird colonies as important global drivers in the nitrogen and phosphorus cycles. Nature Communications. Vol 9, No. 246.

BEYOND PESTICIDES
701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

November 29, 2021

California Coastal Commission
Attn: Mr. Larry Simon c/o All Commissioners
Energy Ocean Resources and Federal Consistency Division
45 Fremont Street, Ste. 2000
San Francisco, 94105-2219
(Via email to EORFC@coastal.ca.gov; larry.simon@coastal.ca.gov;
farallonislands@coastal.ca.gov; Kate.Huckelbridge@coastal.ca.gov;
Cassidy.Teufel@coastal.ca.gov;
and john.weber@coastal.ca.gov)

Re. Deny Federal Consistency Determination Consistency Determination number CD-0006-21 of U.S. Fish and Wildlife Service for South Farallon Islands Invasive House Mouse Eradication Project, Greater Farallones National Marine Sanctuary

Dear Commissioners:

These comments are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

We request that you deny a finding of consistency of the proposed aerial dispersal of the highly toxic rodenticide brodifacoum on the Farallon Islands and that you require that a Supplemental Environmental Impact Statement (SEIS) be conducted by an independent body of alternatives, including the no action alternative and nontoxic control methods. The SEIS should investigate the possibility of controlling the mice through controlled intensified predation by providing nesting boxes for barn owls and/or kestrels.

Globally significant wildlife populations inhabit the Farallones, including hundreds of thousands of seabirds and thousands of seals and sea lions. According to the U.S. Fish and Wildlife Service (FWS), these include: thirteen species seabird species that nest on the islands including Leach's Storm-petrel, Ashy Storm-petrel, Fork-tailed Storm-petrel, Double-crested Cormorant, Brandt's Cormorant, Pelagic Cormorant, Black Oystercatcher, Western Gull, Common Murre, Pigeon Guillemot, Cassin's Auklet, Rhinocerous Auklet, and Tufted Puffin; pinnipeds including Northern fur seals, Steller sea lions, California sea lions, harbor seals, and

northern elephant seals that breed or haul-out onto Farallon Refuge; and endemic species including white sharks, hoary bats, and arboreal salamanders.[1]

Biologists study this complex ecosystem continuously, looking for ways to guide conservation and restoration of the islands in the face of environmental threats. Because of the important and sensitive seabird and mammal populations that use the Farallones as breeding grounds, the islands are not open to the public.

Brodifacoum is a "second generation anticoagulant rodenticide" (SGAR) that is highly toxic to birds, mammals, and fish.[2] It also poses a secondary poisoning risk to predators.[3] The California Department of Pesticide Regulation quotes the FWS, "Secondary exposure to SGARs is particularly problematic due to the high toxicity of the compounds and their long persistence in body tissues. For example, brodifacoum, a common SGAR, is persistent in tissue, bioaccumulates, and appears to impair reproduction... Even in cases where the proximate cause of death has been identified as automobile strike, predation, or disease, toxicologists and pathologists have attained sufficient toxicological evidence to conclude that rodenticide-induced blood loss increased animal vulnerability to the proximate cause of death."[4] The threat of secondary poisoning has led the state of California to ban the use of brodifacoum for almost all uses.[5] Although this particular use is an exception, the risks of the use are extremely high.

Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean.[6] There is no way to limit the impact to the targeted house mouse. A 2015 study conducted after aerial drop of rodenticides on Palmyra Island off the coast of Hawaii reported, "We documented brodifacoum [rodenticide] residues in soil, water, and biota, and documented mortality of nontarget organisms. Some bait (14–19% of the target application rate) entered the marine environment to distances 7 m from the shore. After the application commenced, carcasses of 84 animals representing 15 species of birds, fish, reptiles and invertebrates were collected opportunistically as potential nontarget mortalities. In addition, fish, reptiles, and invertebrates were systematically collected for residue analysis. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed. Although detection of residues in

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[1] https://www.fws.gov/refuge/Farallon_Islands/wildlife_and_habitat/index.html.
[2] Thurston County (WA) Health Department, 2011. Brodifacoum factsheet. https://www.co.thurston.wa.us/health/ehipm/pdf_rod/brodifacoum.pdf.
[3] National Pesticide Information Center. Rodenticides Fact Sheet. http://npic.orst.edu/factsheets/rodenticides.html.
[4] California Department of Pesticide Regulation, 2013. Memo from Deborah Daniels, DVM to Ann Prichard, Pesticide Registration Branch. https://www.biologicaldiversity.org/campaigns/pesticides_reduction/pdfs/DPR-2013-SGAR-Memo.pdf.
[5] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1788.
[6] Masuda, B.M., Fisher, P. and Beaven, B., 2015. Residue profiles of brodifacoum in coastal marine species following an island rodent eradication. *Ecotoxicology and Environmental Safety*, *113*, pp.1-8. https://pubmed.ncbi.nlm.nih.gov/25437099/.

samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected."[7]

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and attract an average of six burrowing owls a year. Owls feast upon ashy storm-petrels when mouse populations drop during the winter, killing hundreds of petrels annually. The global population of the ashy storm-petrel is small (10,000 – 20,000), but it is not considered an endangered species.

As much as we would like to restore native ecosystems, the application of a poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions. We urge you to deny a finding of consistency of the proposed aerial dispersal of the highly toxic rodenticide brodifacoum on the Farallon Islands and require that a Supplemental Environmental Impact Statement (SEIS) be conducted by an independent body of alternatives, including the no action alternative and nontoxic integrated control methods.

Thank you for your consideration of these comments.

Sincerely,

Terry Shistar, Ph.D.
Board of Directors
tshistar@gmail.com

[7] Pitt, W.C., Berentsen, A.R., Shiels, A.B., Volker, S.F., Eisemann, J.D., Wegmann, A.S. and Howald, G.R., 2015. Non-target species mortality and the measurement of brodifacoum rodenticide residues after a rat (Rattus rattus) eradication on Palmyra Atoll, tropical Pacific. *Biological Conservation*, *185*, pp.36-46. https://www.sciencedirect.com/science/article/abs/pii/S0006320715000105.

November 19, 2021

California Coastal Commission

Re: **Farallon Islands House Mouse Eradication Support**

Dear California Coastal Commissioners:

The Yerba Buena Chapter of the California Native Plant Society is submitting the following comment regarding the Commission's consideration of the USFWS plan for eradicating non-native House Mice from South Farallon Islands.

The Yerba Buena Chapter of the California Native Plant Society is a non-profit conservation science organization with over 600 members in San Francisco and Northern San Mateo County. Our parent organization has over 10,000 members statewide. The mission of CNPS is to conserve California native plants and their natural habitats, and increase understanding, appreciation, and horticultural use of native plants. Our vision includes a future where Californians can experience thriving biological diversity.

We support The US Fish and Wildlife Service's project to eradicate the invasive house mice, known as "the preferred alternative". Not only are house mice a threat to nesting sea birds on the island, they're also a threat to maritime goldfields (*Lasthenia maritima*), a California Native Plant that's beneficial to maritime pollinators. Research shows that maritime goldfields represent a large part of the invasive house mice's diet (FEIS Section 1.2.2.4). Removal of human introduced mouse predation on plants and seeds will have a positive impact on the plant's population, size, density and distribution. Plant predation likely has another negative effect of giving hardy invasive plants a competitive advantage, thus, weakening the island ecosystem further. Habitat loss and invasive plants are the leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. The house mouse must be eliminated.

Land managers have successfully eradicated house mice from more than 60 islands worldwide. Nearly all of these successful projects utilized techniques like those proposed for the South Farallon Islands house mouse eradication. We're confident USF&W can safely carry out their mission and enhance the biodiversity of this important home to wildlife.

Sincerely,

Robert Hall, Conservation Chair
California Native Plant Society, Yerba Buena Chapter

PUBLIC INTEREST COALITION

Sent via email: EORFC@coastal.ca.gov November 24, 2021

To: The California Coastal Commission

Subject: Public Comment: **Stop Proposed Farallon Islands Poison Drops**

Greetings:

We strongly oppose the "consistency determination by the U.S. Fish and Wildlife Service" for the "South Farallon Islands Invasive House Mouse Eradication Project" and urge the California Coastal Commission (CCC) to utilize safer, target-specific alternatives.

As a National Marine Sanctuary and a National Wildlife Refuge, it is inconceivable that the CCC would even consider such an inappropriate if not reckless recommendation. Continuous compromised health and/or secondary kills of predators and other non-targeted species—from raptors to mammals—plays havoc with establishing biologically diverse and healthy species populations on the Farallon Islands. The proposed "eradication project" that shockingly uses second generation anticoagulants simply cannot be justified, unless one is an owner or stockholder in the company that will gain from selling the product to the state.

Where this same questionable and/or banned rodenticide bait has been used to try to eradicate mice, evidence has shown that it has failed. Reports are that the entire process then has to be repeated. Any re-application further poisons the ecosystem, reducing further chances of recovery, and again not coming close to achieving the goal.

Surely, learned biologists and innovators can come up with a much more acceptable and safer option. Please (1) follow the Precautionary Principle in decision making with our unique-and-beloved Farallon Islands, and (2) deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project.

Thank you for considering our views,

Marilyn Jasper, Chair

P.O. Box 671 Loomis, CA 95650 Public-Interest@live.com

WESTERN ALLIANCE FOR NATURE

Preserving Everyone's Heritage for all Generations

P.O. Box 1041 Malibu, CA 90265 Tel: 323 345-1555 Fax: 310 456-3380
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Dec. 8, 2021

Chair Steve Padilla and Commissioners
California Coastal Commission

Re: Consistency Determination No.: CD-0006-21
U.S. Fish and Wildlife Service; South Farallon Islands, Farallon Islands National Wildlife Refuge, San Francisco County

Dear Chair Padilla;

The Western Alliance for Nature is writing you to urge you to deny the conditional consistency determination from the US Fish & Wildlife Service Invasive House Mouse Eradication program.

We understand that the mouse population on the Farallones needs to be controlled and if possible eradicated but we believe what is now being proposed has serious consequences for non-target species and there are many questions that still need to be answered and missing information that needs to be provided.

Brodifacoum is the worst chemical that could be applied in this environmental context and this proposal is an attempt to use it in the worst possible place. There are plenty of warnings about keeping Brodifacoum away from seabird colonies because of the ease with which it enters and spreads throughout the food chain.

Following are some reasons why we take the position that the current application should be denied.

High Percentage of failures in using Brodifacoum in aerial apliations worldwide.
Staff states there have been 700 successful drips out of 1200 and cites that as proof of success but that is a 43% failure rate and reason for concern. Of the 1200, 89 used Brodificoum on rodents and staff states that 64 of them were a success- again a 41% failure rate. 38% of the time a second application was required. Even this failure rate is actually too low because it does not account for the percentage of time the rodent populations returned later. It also reflects that the Service uses only one criteria of success- the eradication of the rodents but does not include any measure of impacts to non-target species or short and long lasting impacts to the ability of the ecosystem to sustain such an assault. I am attaching a matrix with some examples of the failures that are documented (Attachment A)

Failure to adequately analyze viable alternatives to Brodifacoum
The EIS in 2013 summarily dismissed any other alternative except Brodifacoum

In 2013, USFWS categorically rejected all other options except Brodificoum. Of the arguments presented to try to debunk alternative solutions, such as too risky, too experimental, will displace or harm non-target wildlife, too sensitive of a habitat to have drones and people walking around that the burrowing owls will be disturbed by relocation efforts, all also obviously apply to the preferred alternative, so that the alternatives can be fairly compared and their comparative risks weighed by the Commissioners. In the case of the use of fertility controls there have been significant advances since 2013 that are not considered. The advancements in contraceptive baits in the years *since* 2013 have led to these fertility control agents being widely deployed in use for rats. Making the transition to fertility control for mice requires only determining a solid "carrier" cereal-based bait that is palatable for mice. EPA has already indicated a willingness to fast-track permits for active use of fertility control baits. This alternative should be discussed and considered.

Report features Anacapa Island as a "success" it is not comparable

Staff report places emphasis on the so called success at Anacapa Island and states it was a comparable project that that it was more complicated than the Farallones. That is simply not correct. At Anacapa, the target species was rats, which according to the EPA (Attachment B) are easier to eradicate with aerial dispersal of rodenticides than mice. In a letter from the EPA, April 15, 2019, it states: EPA continues to highlight the considerable complexity of this project over other recent Island rodent eradications, due to mice being harder to eradicate than rats, and the indirect effect the mice have on the bird species target for restoration – Ashy and Leach's storm-petrels- by attracting burrowing owls that prey on them after mouse levels seasonally decline"
According to your staff At Anacapa they actually removed as many of the raptors they could- 68% of the known raptors were mostly relocated to the mainland to protect them. There is no such removal of raptors in the plan at the Farallones. There were, according to your staff a "total of 94 birds (16 species) were identified from carcass searches following rodenticide applications (49 in 2001 and 45 in 2002). Of the 63 birds tested for"
"Brodifacoum, 59 (94%) tested positive. All raptor carcasses collected tested positive for Brodifacoum, as did two western gull Larus occidentalis carcasses and many passerines "

"Three barn owls, six burrowing owls and an American kestrel Falco sparverius either died in captivity or were found dead during carcass searches; all tested positive for Brodifacoum".

The Anacapa Island application was to benefit a rare endemic species of native Anacapa Island mice by eradication of rats, a limited representative sample of these specific mice were sequestered on Island for the project to enable reintroduction post project. This is a major difference as to outcome and success. Other seabird mortality also went unreported to the public.
Experience with these kinds of problems elsewhere tell us that the house mice at the Farallones are going to be much harder to eradicate.

Impact to Gulls has not been adequately analyzed

In a 2015 USFWS email dated June 29, 2015 (Attachment C) They indicate that the gulls will eat the pellets as they did on Rat Island and that the Gulls will need to be hazed away for 3 months. The USFWS author states that he does not believe that the hazing will work. The hazing trial was successful in keeping only 75% of the birds away for only 14 days. "That makes of the 30,000 gulls 25% is 7.500 gulls returning to the island. The

birds flying back and forth to the island will get sick and die". It states the "minimum number will be 3000 dead gulls in SF". The EPA letter attached state that the "predicted success of the gull hazing plan remains at 90, the level necessary to avoid population-level effects". That number of 3000 was first reduced to 1700 (the population level effect number) and now to 1050. We have no information on the basis for that reduction and we already know that the hazing trial was nowhere near a 90% success rate.
The USFWS will be determining the death toll of the Gulls. Alliance has been asking since 2019 to see the algorithm that is used to determine actual deaths from the numbers of carcasses found. Some carcasses will be found on the Island, Some will be in San Francisco where they are asking people to report the dead birds when they see one. Certainly that will only be a smaller number than the actual dead birds. I doubt many people will call in to report a dead Gull. Worst of all many of the birds will die over the ocean where there is not count. How do they determine what that actual number is and if that number begins to approach 1700, the population level effect, will report it and what will they do about it? Will they stop the drop of poison? There is no final operational plan for the Commission to determine if the risk is adequate. In fact there are 3000,000 to 350,000birds of 13 species, populations o five marine mammal species use the Islands for resting and breeding and migratory birds stop on the Island to rest and fee. Several rare species occur including the endemic Carillon arboreal salamander and the endemic Carillon camel cricket. What type of monitoring and contingency plans have they done for all of these species?
The commission should receive this information prior to making its decision, not afterwards

The Independent monitoring requirement is weak and all related monitoring plans are still pending.

It should include specifically that the writer of the EIS may not conduct the monitoring. A truly independent monitoring effort during the project and afterwards for at least 5 years should be required. In addition the plan should include a chemical analysis of a representative sampling of Carillon Camel Crickets, Dungeness Crabs and a rand of commercial fish species, before and after the drop as well as again six-months and one-year after. For the Crabs and fish the testing for at least an additional 2 and 3 years and shall test the fish livers. This lack of a final plan is consistent with the fact that there are no final mitigation and monitoring plans. They were specifically asked by the Commission in2019 to prepare a final bait spill plan but they have yet to do so, the mitigation and monitoring plans. The EPA asked in 2019 for a mitigation and monitoring pal in is also not yet available nor are is the operational plan or the non-target species contingency plan available for you to review. All of this information is necessary for you to review prior to any approval since this is information you need to make your final risk assessment evaluation.

Recommendation for approval goes against what staff has said in the Malibu LCP

The Malibu LCP states "The introduction of pesticides to coastal waters can cause cumulative impacts such as: fish kills and diseases and the alteration of aquatic habitat, adverse changes to species composition and size; disruption to the reproductive cycle of aquatic species; acute and sub lethal toxicity in marine organisms leading to adverse changes in reproduction and feeding behavior; and potential impacts on human health." If this applies to Malibu why does it not apply to the Farallons. In Malibu the impact on coastal waters is from run-off from rain and not from accidental bait spill and with considerably less bait than the tons dropped on the Farallons. The staff report indicates that they drop will be "shortly after a rain". How is that consistent with the Malibu LCP If it rains there will be run-off into

the ocean. If the drop is done when no rain, the pellets will be eaten by the Gulls and other species. Either way, this is going to cause a problem.

For all these reasons and many others not enumerated in this letter, including the inconsistency with Section 30240, and does not contain complete information for you to fully understand the impacts and how they will be handled, does not provide sufficient monitoring or conditions to reduce what can be expected as impacts to non-target species, we ask that the Commission deny the Consistency Determination.

Sara J. Wan
Executive Director
Western Alliance for Nature
Former Chair, California Coastal Commission

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Attachment A

Tawhitinui Island, New Zealand – 1984 **(and other New Zealand drops)**
From the envirowatchrangitikei website – "The entire western weka (rare NZ native bird) population was exterminated in a Brodifacoum drop on Tawhitinui Island (1984).

Fregate Island, Seychelles- 2001- significant impact to invertebrates and extinction of a species of snail

Hawaiian Drops: Keauhou Ranch, Mokapu Island and Lehua, near Kauai 2017- rats survived the poison drop but the birds and fish did not.

Rat Island, Alaska 2009- monitoring, which did not take place until 8 months after project ended found 400 dead birds and 44 dead eagles. Imagine how many actually died.

Palmyra Atoll 2011- bait entered marine environment resulting in death of birds, fish, reptiles and invertebrates

Wake Island 2012- US Air Force imposed a 942 day fishing ban following project. Brodifacoum residues persisted in bioassays of fish three years after the drop, a project which unfortunately also happened to fail to eradicate all of the targeted rats there

Lehua Island, Hawaii- 2017- major fish kill happened that was not reported,

ATTACHMENT C

---------- Forwarded message ----------
From: **Michael Fry** <michael_fry@fws.gov>
Date: Mon, Jun 29, 2015 at 2:33 PM
Subject: RE: Chemotherapy for Island Wildlife
To: EWilli9767@aol.com
Cc: Maggie Sergio <maggiesergio@gmail.com>, Katie Swift <katie_swift@fws.gov>

Hi Ted,
Thanks for the article on brodifacoum and the Farallons. I was on leave when it came, and am just now finding all my unread mail….
The photo of the ashy storm petrel is one of the best sea surface photos I have ever seen. To get both the bird and the ocean surface in focus was amazing. Who took the photo?
Your piece is an interesting conversation with IC, ABC and FWS. I agree with most of the comments expressed in the article, although I have come to the opposite conclusion on the utility of the project. Non-target kills. Gulls will need to be hazed away from the island for 3 months. This is the highest population breeding colony of Western Gulls anywhere. I do not believe Gerry McChesney that gulls can be kept away from their breeding territories early in the breeding season when birds are defending territories. The hazing trials he talks about were not during the breeding season. And then they were successful in keeping only 75% of the birds away for only 14 days. 30,000 gulls; 25% is 7,500 gulls coming back to the island. There will be 2-3 lethal doses of fish flavored pellets in EVERY gull territory. Gerry thinks the gulls won't eat them. I do. They did on Rat Island. Every gull on the Farallons goes to the mainland every day. 95% of all the gulls at the SF Zoo, Fisherman's Wharf, Alcatraz Is. are from the Farallons. Brodifacoum takes 4-7 days to kill a bird. All of the birds will be flying back and forth until they get sick and die. Probably half will die in San Francisco. Minimum number will be 3000 dead gulls in SF. More if the hazing is less successful. (I'll send the reports if you want).
This gull kill is very much like the FWS disaster of Great Black Backed Gulls from Monomoy Refuge near Cape Cod in 1996. Many of the gulls flew to Chatham on Cape Cod and died. The City had to have a clean-up crew for weeks to collect dead birds. The FWS got a terrific black eye from that project. I spoke with Dan Ashe about the parallel with the Farallons and San Francisco, and he agreed that it must not happen.
Maggie Sergio was ALMOST right on the amount of bait needed for the Farallons. You reported she said 1.3 metric tons. Actually it is 1.51 metric tons. The table below shows the calculation. The Farallons are 42 hectares.

42 hectares times 18 kg bait /hectare, times two applications equals 1512 kg = 1.512 metric tons. True, the active ingredient is only 0.0025%, which is only 1.3 ounces active ingredient, but the helicopter will drop 1.5 tons of bait.
Ashy Storm Petrels are not killed by mice, They are killed by burrowing owls. No data has been provided to predict whether the loss of mice will result in fewer owls coming to the island. The kill of petrels is from only 5-12 owls each year. Why not control the owls? I reported in 1984 that owls were predating storm petrels every night.

The most interesting thing about the petrels is that the population of petrels is INCREASING on the Farallons:

So, there are now 2-3 times as many petrels on the island as there were when I reported the owl predation. I have attached the petrel population report.
Bottom line for me: I think rodenticide control of invasive species is effective, important and necessary on most islands.. I do not think it is wise to try it on the Farallons, simply because the public relations fall-out over dead gulls in San Francisco will be terrible. Dan Ashe will get the heat.
We will think up another way of protecting the petrels, crickets and salamanders.
Thanks very much for sending the article. I think you do excellent work, but Maggie is right about Bill Waldman's Kool-Aid.
Best regards,
Michael

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RE: Consistency Determination number CD-0006-21

Dear California Coastal Commission,

I would like to comment in support the U.S. Fish and Service's attempts to eradicate introduced House Mice from the Farallon Islands off San Francisco.

I am a biologist and marine ecologist who worked on the Farallones for 24 years (1980-2003). Until recently I had spent more nights on Southeast Farallon Island (2,187) then any other person in the modern era. Although I have worked there in all months of the year, my primary season was in the fall, when the House Mouse problem is most acute. My primary focus during this season was the study of migratory birds, including the Burrowing Owl. Based on both our data and my in-situ experience, I was the first to realize the connection between the mice, the owls, and predation upon the Ashy Storm-Petrel. Importantly, many owls also perish, as the storm-petrels cannot sustain them in late winter, and we would routinely find dead emaciated owls in spring. In 2013 I commented in support of the mouse eradication project in editorials to the Sonoma Press Democrat
https://www.pressdemocrat.com/news/2228418-181/close-to-home-eradication-of?sba=AAS
and the Point Reyes Light
https://www.ptreyeslight.com/article/tradeoff-clear-farallon-islands

The proposed mouse-eradication project is grounded in the absolute best and most-current science available, including that on previous mouse eradication attempts and success. Biologists for Point Blue Conservation Science and (as formerly known) the Point Reyes Bird Observatory have maintained a continuous presence on Southeast Farallon Island since April 3rd, 1968, an uninterrupted period of over 50 years, during which they have intensively researched all aspects of the island's ecology. This has lead to the Farallones being one of the most, if not the most, ecologically known locations in the world. The mouse-eradication project's design and planned mitigation efforts to protect other forms of wildlife is grounded in thoroughly researched scientific evidence. This is the reason why those who have studied the ecology of the Farallones are unanimously in favor of the eradication effort.

Most of those opposed the project have spent little or no time on the Farallones and are not using scientifically grounded assessment. I would like to respond point-by-point to some of the arguments in opposition to the project from the perspective of one who has intensively studied and substantially knows the Farallon Islands:

1. Over "a metric ton of rodenticide" will be dropped on the Farallon Islands.
This has been an angle of misdirected messaging used by the media and opponents of the project since its Draft EIS was issued in 2013. Instead the project calls for the use of only 1.16 oz of Brodifacoum rodenticide in over a metric ton of non-toxic pellet bait. Brodifacoum was formerly the key ingredient in the rodenticide "D-Con" which until recently was freely and cheaply available (for about $5) at drug and hardware stores or on line. I certainly applaud recent efforts to ban Brodifacoum in D-Con but it is still being used

widely by those who bought the product over 3 years ago, including illegal Cannabis farmers in California, while Brodifacoum continues to be the most widely used slow-acting rodenticide worldwide, according to a recent scientific assessment (https://pdfs.semanticscholar.org/04cc/21ffa3536ac58770b3204389382b63f3c529.pdf). Further, a recent California Pesticide Report indicates that approximately 209 million pounds of pesticides were used in California in 2016 alone, most by farmers in the Central Valley. Those of us in favor of the mouse-eradication project are not being complacent about the use of Brodifacoum. But we understand that, in the context of unsupervised, profit-motivated use of Brodifacoum and other pesticides in California and worldwide, the highly controlled, targeted conservation use of 1.16 ounces for this project represents an acceptable level of application and risk to other wildlife given the potential huge benefit of mouse removal to the long-term Farallon Island ecology.

2. Incidental ingestion of Brodifacoum will lead to widespread destruction of non-target wildlife and the surrounding marine ecosystem. Those who are concerned by this should carefully read the final EIS document prepared by the USFWS in March 2019, including the Memorandum (Exhibit 5 of the EIS) prepared by Ecologist Dr. Lauren Garske-Garcia in June 2019. The thorough, science-based mitigation efforts that will be implemented as part of the project, to limit non-target harm by Brodifacoum to terrestrial wildlife and the marine environment, are based on data collected by researchers on the Farallones for over 50 years. As one who spent over 20 fall periods on the Farallones, I can add that the timing of best application for mouse eradication, November-December, advantageously coincides with the period of least wildlife use of the island. Application of Brodifacoum can be timed for periods when practically no seabirds are present. When winds during this late-fall period are from the south or east, very few if any gulls and no other seabird species are present on shore. Those gulls that do roost on the island during these weather conditions, furthermore, are not the locally breeding individuals and are thus very skittish and easily flushed from the island. Weather forecasting has become sophisticated enough that the application can be targeted for a period of such weather conditions but no rain, which will result in the best possible results in terms of non-target wildlife ingestion or effects due to potential run-off of Brodifacoum into the marine environment.

3. House mice on the Farallones can be controlled by trapping and other non-invasive techniques. Given the highly cyclical nature of the mouse population dynamics this simply does not represent a solution. Indeed, over the years, Farallon biologists have tried all manner of trapping mice when they reach peak population levels in fall. Trapping has also been attempted in spring, at times when mice are underground and not observed at all. At this time they do not come in to bait, apparently due to plenty of additional food being available. Given the geologically porous nature of the subterranean Farallon physiography, including an abundance of burrows, caves, and catacombs, it is absolutely impossible to effect a permanent control of the mouse population using non-invasive techniques.

4. The mice will suffer from the ingestion of Brodifacoum. I sympathize with this viewpoint from animal-rights activists. However, as I argue in my editorials (see links above), the current situation leads to the widespread annual drenching, death, and cannibalism of tens of thousands of mice per year, once the first heavy rains of winter occur. Those concerned with the suffering of mice should be in favor of an eradication effort to end this annual destruction.

5. Removal of mice will not cause Burrowing Owls to continue migration from the Farallones in the fall. This opinion is counter to all scientific research on bird migration, including results of the >50 years of daily counts of migrant birds on the Farallones. It is not only shown by our data but it is completely intuitive that if there is no food at a location, a stopover-migrant bird will keep going, rather than remaining at a location that lacks food and starving to death. Of the hundreds of thousands of migrant landbirds surveyed at the Farallones over the past 50 years, the only individuals that remain for longer than a few days are those (<0.1%) that eat seeds or are found in rocky non-vegetative habitats and can find food in the Farallon environment. Among raptors, those species that specialize on landbirds (e.g., Accipters) rarely stay for longer than 1 day because there is simply not enough of a food resource for them to stay. Without the mice, the Burrowing Owls would not have anything to eat besides beetles, not nearly enough to sustain them. If they do not migrate from the Farallones, which they assuredly will according to all science-based research on bird migration, they will starve to death. This of course would not be good for the owls but is better than their surviving for half the winter on the Farallones, killing dozens of storm-petrels, and then starving to death anyway.

In sum, I believe that we must follow a science-based rather than an emotionally based process in evaluating this project. I understand that there are those that do not evaluate science or agree with science-based approaches, but hope those in this camp represent the minority opinion. The bottom line is that the benefits to removing mice from the Farallones so outweigh the risks, that the attempt can be fully justified from a both scientific and an emotional perspective.

Respectfully submitted,

Peter Pyle
The Institute for Bird Populations
P.O. Box 1346
Point Reyes Station, CA 94956
415-663-2053
ppyle@birdpop.org

CC:
Gerry McChesney, Manager, Farallon Islands National Wildlife Refuge
Jaime Jahncke, California Current Director, Point Blue Conservation Science

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 **2,079** separate contacts:

Stop the Poisoning of the Farallon Islands in California

Dear Farallon Islands,

I request that you deny the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge. Globally significant wildlife populations inhabit the Farallones, including hundreds of thousands of seabirds and thousands of seals and sea lions. These include: 13 seabird species that nest on the islands; pinnipeds including Northern fur seals, Steller sea lions, CA sea lions, harbor seals, and northern elephant seals; and endemic species including white sharks, hoary bats, and arboreal salamanders.

Brodifacoum is a “second generation anticoagulant rodenticide” (SGAR) that is highly toxic to birds, mammals, and fish. It also poses a secondary poisoning risk to predators. The California Department of Pesticide Regulation quotes the FWS: “Secondary exposure to SGARs is particularly problematic due to the high toxicity of the compounds and their long persistence in body tissues. For example, brodifacoum, a common SGAR, is persistent in tissue, bioaccumulates, and appears to impair reproduction. Even in cases where the proximate cause of death has been identified as automobile strike, predation, or disease, toxicologists and pathologists have attained sufficient toxicological evidence to conclude that rodenticide-induced blood loss increased animal vulnerability to the proximate cause of death.” The threat of secondary poisoning has led the state to ban the use of brodifacoum for almost all uses. Although this particular use is an exception, the risks of the use are extremely high.

Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean. There is no way to limit the impact to the targeted house mouse. A 2015 study conducted after aerial drop of rodenticides on Palmyra Island off the coast of Hawaii reported: “We documented brodifacoum [rodenticide] residues in soil, water, and biota, and documented mortality of nontarget organisms. Some bait (14–19% of the target application rate) entered the marine environment to distances 7 m from the shore. After the application commenced, carcasses of 84 animals representing 15 species of birds, fish, reptiles and invertebrates were collected opportunistically as potential nontarget mortalities. In addition, fish, reptiles, and invertebrates were systematically collected for residue analysis. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed. Although detection of residues in samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected.”

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and attract an average of six burrowing owls a year. Owls prey upon ashy storm-petrels when mouse populations drop during the winter, killing hundreds of petrels annually. The global population of the ashy storm-petrel is small (10,000 – 20,000), but it is not considered an endangered species.

As important as native ecosystems are, the application of a poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions.

Please deny a finding of consistency of the proposed aerial dispersal of the highly toxic rodenticide brodifacoum on the Farallon Islands and require that a Supplemental Environmental Impact Statement (SEIS) be conducted by an independent body examining alternatives, including the no action alternative and nontoxic integrated control methods. The SEIS should investigate the possibility of controlling the mice through controlled intensified predation by providing nesting boxes for barn owls and/or kestrels.

Thank you for considering this request.

This item is a form letter sent to the Farallon Islands Consistency inbox from **130** separate contacts:

Support for Farallon Islands Mouse Eradication Plan

Dear Commissioner,

I am writing to voice my support for the US Fish and Wildlife plan to eradicate invasive house mice from the Farallon Islands.

Non-native house mice have caused significant disturbance to the Farallons' sensitive ecosystem. This invasive species has a detrimental impact on the islands' breeding seabirds, such as in the case of the Ashy Storm-Petrel. Roughly 50% of the world's population of this rare endangered bird nests in burrows on Southeast Farallon Island. The mice consume seabird eggs, hindering breeding and reproduction. They spread non-native weed seeds around the island, choking out native vegetation. Their presence even attracts migrating Burrowing Owls, who catch and kill these small seabirds when the mice aren't as readily available. Other native species of seabirds, salamanders, crickets, and plants also suffer the direct and indirect harmful impacts caused by house mice.

The Farallon Islands are critical refuges for marine mammals and seabirds. The only way to allow this delicate ecosystem to recover is to eradicate the house mice. At current, the best known method for island eradications is application of rodenticide via aerial broadcast.

Like many science, conservation, and wildlife organizations, I support USFW's Farallon Islands Mouse Eradication Plan. I request that the California Coastal Commission approve the house mouse eradication program.

Thank you for your consideration and for following the best available science in hopes of protection for the unique species that call the Farallons home.

This item is a form letter sent to the Farallon Islands Consistency inbox from **11** separate contacts:

Please do not poison the Farallon Islands

- 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.

This item is a form letter sent to the Farallon Islands Consistency inbox from **10** separate contacts:

Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21
(U.S. Fish and Wildlife Service, San Francisco)

Dear Commissioners,

I live in California and care deeply for finding a better solution than dropping rodenticides on the Farallon Islands. I have worked with wildlife for the past decade and contribute to conservation causes for California's coastal health. I am against the proposal to drop Brodifacoum onto the Farallon Islands when other alternatives (rodent fertility control/trapping/relocating owls) have not been exhausted. Please do not pass this proposal!

A total of **40** 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:
No Drop
No Drop - Stop the Poison
No Drop of Poison on the Farallon Islands
No Poison Drop
No Poison
Please Do Not Poison the Farallones Islands
Poison Drop

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

Individual Emails

From:	Teufel, Cassidy@Coastal
To:	Krygsman, Vail@Coastal
Subject:	FW: Resubmitting for CD-0006-21 record
Date:	Wednesday, December 8, 2021 3:33:52 PM
Attachments:	Kathrin Sears Marin BOS Letter.pdf

Please include this – 1 of 2

From: Alison Hermance <alisonhermance@discoverwildcare.org>
Sent: Wednesday, December 8, 2021 3:24 PM
To: Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>
Subject: Re: Resubmitting for CD-0006-21 record

Hi Cassidy,
Oh no! Thank you for letting me know! The document is attached now.
Thanks,
Alison

On Wed, Dec 8, 2021 at 2:37 PM Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov> wrote:

> Ms. Hermance –
> Thank you for providing this correspondence. Please note that no attachment was included with your email.
> Regards,
> Cassidy
>
> ---
>
> **From:** Alison Hermance <alisonhermance@discoverwildcare.org>
> **Sent:** Wednesday, December 8, 2021 2:31 PM
> **To:** Energy@Coastal <EORFC@coastal.ca.gov>; Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>; Farallon Islands Consistency <farallonislands@coastal.ca.gov>
> **Subject:** Resubmitting for CD-0006-21 record
>
> Dear Commissioners,
>
> WildCare is resubmitting this letter from the Marin County Board of Supervisors showing the most recent position that the Board has taken in responding to the Farallones Islands poison drop plan.
>
> The letter from the Board is attached.
>
> Thank you,
> Alison

COUNTY OF MARIN

BOARD OF SUPERVISORS

Marin County Civic Center
3501 Civic Center Drive
Suite 329
San Rafael, CA 94903
415 473 7331 T
415 473 3645 F
415 473 6172 TTY
www.marincounty.org/bos

June 26, 2019

California Coastal Commission
Attn: Mr. Larry Simone c/o All Commissioners
Energy Ocean Resources and Federal Consistency Division
45 Fremont Street, Ste. 2000
San Francisco, 94105-2219
(by mail and via email to EORFC@coastal.ca.gov)

RE: CD-0002-19 (Agenda item: W14a)

Dear Commissioners,

The County of Marin has long been a central hub of the movement that led to the designation of the original Farallon Islands National Marine Sanctuary in 1981, in cooperation with our congressional representatives, our state legislators, our governor, and Marin's neighboring counties and cities. Our Board of Supervisors was one of the first local agencies to adopt formal resolutions of support for permanent marine sanctuary protection off our coastline.

We are writing at this time to request that the Coastal Commission deny a federal consistency finding to the US Fish and Wildlife Service's proposed aerial application of brodifacoum rodenticide in our Greater Farallones National Marine Sanctuary and amidst our coastal waters pursuant to CD-0002-19. The County of Marin has adopted an Integrated Pest Management Plan (IPM) which recognizes the hazards of secondary poisoning with the use of second generation (or single-dose anticoagulant) rodenticides of the type being proposed for CD-0002-19. Marin County successfully manages sites under our IPM Plan without the application of such materials on County of Marin lands.

Since EPA Region IX has duly cautioned USFWS that secondary human exposure from the Farallones "drop" could occur at mainland shoreline locations, which includes the Marin coastline (see attached EPA letter of April 15, 2019), we must emphasize that we have a direct interest in this matter.

Thank you for this opportunity to provide comments on CD-0002-19. Please deny a finding of federal consistency to this proposal.

Sincerely,

Kathrin Sears

Kathrin Sears, President
Marin County Board of Supervisors

Attachment: EPA letter of April 15, 2019 in comment on the USFWS FEIS

cc: Honorable Senator Dianne Feinstein
Honorable Senator Kamala Harris
Honorable Congressman Jared Huffman

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

April 15, 2019

Gerry McChesney, Refuge Manager
Farallon National Wildlife Refuge
9500 Thornton Ave.
Newark, CA 94560

Subject: Final Environmental Impact Statement (FEIS) for the South Farallon Islands Invasive House Mouse Eradication Project, Farallon National Wildlife Refuge, California (EIS No. 20190027)

Dear Mr. McChesney:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The U.S. Fish and Wildlife Service (FWS) proposes to eradicate non-native house mice from the South Farallon Islands off the coast of San Francisco using aerially broadcast rodenticide in an effort to restore the ecosystem. As a cooperating agency for the project, EPA provided scoping comments to the FWS on June 10, 2011, and well as early input on the alternatives selection report and the Administrative Draft Environmental Impact Statement (February 16, 2012 and February 5, 2013 respectively). EPA reviewed the Revised Draft Environmental Impact Statement (RDEIS) and provided extensive comments to the FWS on December 9, 2013. In that letter, we commented on the necessity for thorough planning and analysis of impact assessment, mitigation, and monitoring due to the complexity of the project. We also provided comments regarding the potential population level impacts to gulls and the effectiveness of the proposed gull hazing operation. In addition, we recommended an independent third-party post-project review to maximize lessons learned from this eradication effort.

EPA supports the concept of a well-planned restoration. We acknowledge that the FWS, the government agency with trust responsibility for managing wildlife within a national wildlife refuge, is responsible for determining the acceptability of nontarget mortalities versus benefits to vulnerable species. We note that the project can proceed utilizing existing registered rodenticides; however, should the project require application rates or other application parameters that are not allowed by existing product labels, FWS will have to work with the registrant of the product selected for use to submit an application to EPA's Office of Pesticide Programs for revised labeling. .

EPA continues to highlight the considerable complexity of this project over other recent island rodent eradications, due to mice being harder to eradicate than rats, and the indirect effect the mice have on the bird species targeted for the restoration - the ashy and Leach's storm-petrels - by attracting burrowing owls that prey on them after mouse levels seasonally decline. Even in cases of direct impact by rodents,

predicting treatment effects has proven difficult and has sometimes resulted in more non-target mortality than expected. Changes to the FEIS indicate that the petrels are no longer the primary target for the restoration, but instead the goal is to eradicate mice to eliminate their impacts on the native ecosystem. The FEIS acknowledges the "imprecise knowledge of impacts of mice to resources" (p. 141) but states that there has been sufficient planning and consideration and that the project's predicted effects are not overly optimistic as EPA had suggested (Appendix P, p. 68).

Following our review of the RDEIS, our main recommendations regarded the need for adequate planning to avoid the problems experienced in past failed rodent eradications, including contingency planning as a part of the adaptive management plan. We recommended disclosing specific mitigation and Best Management Practices (BMPs) that would be applied in the FEIS. The FEIS indicates that contingency plans are being developed, adaptive management and mitigation plans would be prepared should the project proceed, and the specific BMPs that would be applied will be identified in the Record of Decision. Other information, such as application of bait and carcass removal, would be contained in the Operational Plan that would be developed, and a detailed plan for monitoring of operational, mitigation, and ecosystem restoration objectives will be part of the Operational Plan, according to the FEIS. Much information is deferred to these plans. While the FEIS states that "The Service has committed to allow the operational team the opportunity to fully review the operational plan, ask questions, and suggest revisions prior to initiation", we note that Recommendation #4 by the Ornithological Council, cited in the FEIS, recommends that project-related documents, including operational plans, be made available to the public (p. 22).

> ***Recommendation:*** Since the Operational Plan will not be made public, we recommend that it be offered to other knowledgeable third-party experts, in addition to the operational team, for review prior to implementation.

The predicted success of the gull hazing plan remains at 90% (p. 161), the level necessary to avoid population-level effects to the Western Gull, the largest known colony of which exists in the South Farallon Islands (p. 157). In our comments on the DEIS, we questioned whether the predicted staff level of 10-12 people would be sufficient for gull hazing, given the hazing trial's much smaller area and time period and the habituation that was observed. According Appendix P, p. 38 (response to comments), FWS confirmed that 10 personnel would be sufficient to handle all of the hazing duties for the duration of the project, and if additional hazing personnel are needed, the Service would be prepared to add hazing staff and haze for as much time as is necessary to minimize the numbers of gulls consuming rodenticide bait.

> ***Recommendation:*** EPA recommends the FWS ensure sufficient funding is secured for additional hazing staff, as needed, prior to project implementation, and that this commitment be identified in the Record of Decision.

EPA's comments on the RDEIS addressed carcass removal, which is a pesticide label requirement, and we requested that the FEIS include a commitment for monitoring of mainland beaches for gull carcasses and that public notification be extended to all segments of the public (in addition to boaters). We appreciate that FWS acknowledges that sickened or dead birds could show up on mainland beaches or other areas (Appendix P, p. 29), and that monitoring would occur via volunteers of the Sanctuary's Beach Watch program. The FEIS states that public notices would be posted about the eradication project but doesn't indicate where this will occur. Posting on websites is not sufficient to reach all potentially affected people.

Recommendations: EPA recommends the public notification include communications to media outlets as well as other organizations that utilize the beaches, such as the Surfrider Foundation, the Golden Gate National Parks Conservancy beach stewards, and dog recreational organizations such as SFDOG.

EPA's RDEIS comments recommended that the impact assessment include an analysis of risks in case the eradication in not successful, since house mouse eradications historically have had relatively high failure rates compared to rats[1] and the possibility exists that, should the effort fail, resources may have to withstand impacts from rodenticide along with the continued impacts from mice. The FEIS states that assessments of potential impacts assuming eradication failure is beyond the scope of the EIS, and that if the project proceeds, the FWS assumes that the eradication will be successful (Appendix P, p. 66).

Recommendations: We strongly suggest that FWS arrange for an independent third-party review of the project to maximize lessons learned. This occurred for projects that failed, such as Rat Island and Wake Island, but also for successful projects including Palmyra atoll. We request that FWS commit to and ensure funding for this independent post-project review in the Record of Decision.

EPA appreciates the opportunity to review the FEIS. We appreciate that FWS may consider collaborating with interested wildlife rehabilitation organizations, as we suggested, to care for wildlife impacted as a result of the Farallon mouse eradication project, if funds are available (Appendix P, p. 67). If you have any questions, please contact me at 415-947-4161, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Connell Dunning

Connell Dunning, Acting Manager
Environmental Review Section

[1] According to the FEIS, Table 2.2, just under 69% of mouse eradication attempts using Brodifacoum were successful

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, Ca 94105-2219

RE: December 2021 Agenda Item Thursday 11b CD – 000621

Dear Commissioners,

I have read the *Coastal Consistency Determination Farallon Island National Wildlife Refuge: South Farallon Islands Invasive House Mouse Eradication Project* (CD) prepared April 2021 and reviewed archived general public comments submitted via ZOOM at the Commission's September 2021 meeting. I write to voice my strong support for this project and urge you to approve it without delay. The project is not only consistent with provisions of the California Coastal Act, but it is essential to reversing the decline a listed California Bird Species of Concern. The California Dept. of Fish and Wildlife's (2008) Bird Species of Concern report identifies, "Reduc(ing) Burrowing Owl predation on storm-petrels at the South Farallon Islands by eradicating non-native House Mice", as a key management action.

I served as manager of the Farallon Islands National Wildlife Refuge (FNWR) for 12 years (1996 to 2008) and am a retired Wildlife Biologist with 37 years of service for four Federal Agencies, and a Certified Wildlife Biologist credential from The Wildlife Society. I'd like to share some personal perspectives to augment the well-written and comprehensive CD (referenced above) and Environmental Impact Statement prepared by the U.S. Fish and Wildlife Service and published in the Federal Register March 15, 2019.

During my tenure as Refuge Manager, populations of most seabird species on South Farallon Island increased or experienced up and down cycles that could be explained by factors outside of our control such as such as the El Niño oscillations, variations in ocean temperature, or other changes brought on by climate change. A population viability analysis of ashy storm-petrels in the mid-1990s by Point Blue (then Point Reyes Bird Observatory) alerted me to the long-term decline of this species and prompted me to take action since the Refuge supported the largest single colony of this seabird. Studies indicated that predation of adult petrels was a major factor, so in the 1990s and early 2000s we conducted investigations (remote video cameras, track plates, petrel wing and owl pellet collections) to determine what was eating the petrels. We then implemented actions to thwart these predators, mainly burrowing owls and occasionally western gulls. We captured and relocated burrowing owls to suitable habitat on the mainland with limited success. Burrowing owls proved difficult to capture, and when we did succeed, timely boat

transport to ensure the safe transfer of owls was often unavailable due to weather or other factors. We tested overhead wires to exclude western gulls from important ashy storm-petrel nesting habitat, but this was met with little success.

We funded studies to determine the movements and feeding habitats of burrowing owls, which occur seasonally but do not breed on South Farallon Islands, and discovered that the owls arrived in the fall when non-native house mouse populations peaked. When the house mouse population crashed during the winter rains, the burrowing owls switched to the only food source available – adult ashy storm-petrels returning to their breeding colonies. This aberrant situation was bad for burrowing owls (also a California Bird Species of Concern) since many owls starved to death on this atypical diet.

We needed to restore natural balance to this island ecosystem so we called in experts with experience in rodent control from North America, New Zealand and other oceanic islands to advise Refuge personnel on options for eliminating exotic house mice, unintentionally introduced onto South Farallon Islands before it became a National Wildlife Refuge. The experts recommended 100% eradication with aerially applied rodenticide as the effective method. We followed their advice and conducted preliminary studies on mouse population cycles and diet. We also began studying other lesser-known aspects of native island wildlife, such as the distribution and population size of arboreal salamander, radio-telemetry studies of wintering burrowing owls, and patterns of winter gull use.

We also successfully sought outside funding sources and partners to conduct a number of major projects that protected and enhanced nesting habitat for ashy storm-petrels and auklets (another small seabird prone to predation). In 2000, we constructed boardwalks using recycled plastic lumber to protect nesting borrows from human foot traffic. Throughout the 2000s we broke up old concrete foundations (relicts from past human habitation) and piled them up to create nesting burrows, and used the concrete rubble to screen nesting areas from human activity. We started a multi-year, multi-partner project in 2005 which reconstructed the Lighthouse Trail wall to incorporate nesting crevices for ashy storm-petrels.

Since 2008, the Refuge has continued to refine methods, study the interaction between mice and burrowing owls, evaluate potential impacts, test ways to mitigate effects on non-target species (e.g. hazing gulls, capturing arboreal salamanders), developed monitoring plans and contingency plans, and modified project design to address concerns of critics.

This history emphasizes that the project to eradicate introduced, invasive house mice by aerial application of rodent bait on South Farallon Islands is a culmination of over 20 years of careful study, analysis, debate, and trying less-costly and gentler (but ineffective) solutions. This time and effort is worthwhile because eradicating house mice on South Farallon Islands is now the

most important project that the Refuge can undertake to restore ecosystem function of this environmentally sensitive habitat area (ESHA), and reverse the decline of a major segment of the ashy storm-petrel breeding population.

Thank-you for your time and attention to this conservation project, which is based soundly in science. Please vote to approve it.

Joelle Buffa
2981 Avenida de Suenos
Sierra Vista, AZ 85650
clyde_joelle@verizon.net

Cited Publications:

San Francisco Bay NWR Complex. 2021. Coastal Consistency Determination Farallon Island National Wildlife Refuge: South Farallon Islands Invasive House Mouse Eradication Project. Fremont, CA. 256 pp.

Shuford, W.D. and T. Gardali, editors. 2008. California Bird Species of Special Concern. Publ Western Field Ornithologists and CA Dept. Fish and Game.
https://wildlife.ca.gov/Conservation/SSC/Birds

From:	Mark J. Rauzon
To:	Farallon Islands Consistency
Subject:	"Support for Farallon Islands Mouse Eradication Plan".
Date:	Thursday, December 2, 2021 8:56:31 AM

DEAR COMMISSIONERS

As a seabird biologist and eradication practioneer, let me assure you that this proposed project has been planned to the Nth degree by specialists who have decades of experience in successful eradications. It is State of the Art conservation and despite the misinformation promulgated against it, will have long-lasting positive outcomes if successful. Every effort has been made to make it so. The only way to allow the island 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.

Obviously, Brodifacoum is a toxin, but the actual amount used in ounces and the tonnage is the cereal bait. Yes, it is banned in CA but that was for indiscriminate use by homeowners to kill rats that inadvertently killed raptors and other native predators. Conservation use is maintained for these surgical strike situations. If a rat infested ship crashed into the Farallon Islands, would toxins not be permitted? No they would be used immediately, or the island birdlife would be wasted. Now you have the chance to correct an earlier shipwreck infestation of mice and SAVE THE ASHY STORM PETREL! As we face the 6th extinction crisis, I recall what Steward Brand wrote: We are as Gods and have to get good at it. So let get on with it. Please approve the conservation efforts on the Farallon Islands.

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

Sincerely,

Mark Rauzon

Mark J. Rauzon
Geography Dept.
Laney College
900 Fallon St.
Oakland, CA 94607

ps/ for further reading of eradication successes - see ISLES OF AMNESIA
http://www.amazon.com/dp/0824846796/ref=pe_825000_114660910_TE_item

From: Mail Service
To: Energy@Coastal
Subject: A disaster in the making
Date: Saturday, November 27, 2021 10:38:07 AM

The planned poison drop on the Farallon islands is an ecological disaster in the making. This WILL result in massive deaths of innocent animals and spillover into other areas. This is a bad idea that needs to not happen. Chris Pedone-Golden Colorado

From:	Tamara Goldsmith
To:	Energy@Coastal
Subject:	CA Coastal Commission Use of Poisons on Farallon Islands
Date:	Monday, November 29, 2021 1:12:52 PM

To whom it may concern:

I am writing to request that the CA Coastal Commission vote not to allow the use of poisons on the Farallon Islands in an attempt to control mice.
There is no way to ensure other wildlife won't be affected and there is no "safe-level" use of these poisons.

I am in agreement with Wildcare, and the statement put out by their organization that "a comprehensive, nontoxic IPM strategy should be the choice, not poison."

Thank you.

Sincerely,

Tamara Goldsmith
San Rafael, CA

From:	marsha armstrong
To:	Energy@Coastal
Cc:	marsha f armstrong
Subject:	California Coastal Commission hearing re "consistency determination" request by USFWS
Date:	Saturday, November 27, 2021 11:53:36 AM

I again respectfully request denial of the USFWS "consistency determination".

In July of 2019,after reading the USFWS consistency determination request, hundreds of cogent criticisms by individual citizens, numerous well-documented critiques by animal-welfare NGOs and at least two letters of opposition from local government entities whose residents and environments would suffer harms, I submitted letters of opposition to the CCC members and staff. In the face of the widespread public opposition, the USFWS withdrew its request. They have now returned with new arguments for the same massive drop of brodifacoum (a poison that the State of California finally banned for general public use in 2020, because it has been killing nontarget predators for so many years) Brodifacoum will kill mice and birds,and then kill the predators and scavengers that eat the first victims,and then up the food chain to the more appreciated foxes, coyotes,mountain lions,hawks, eagles, as well as sickening the occasional dog,cat and human child.

The idea that USFWS will create adequate disturbance over the Farallon Islands National Wildlife Refuge to scare away non-target birds begs several questions: 1: if nonstop hazing goes on for the many months that brodifacoum persists in the resulting mouse and bird cadavers, how will it affect the wildlife in and around the Refuge ?;should such disruptions be permitted in a wildlife refuge? or adjacent to nearby state reserves, state conservation areas, state marine park, national marine sanctuary ??

The idea of killing thousands of non-target animals in order to prevent predation by a few small owls on a few (officially non-endangered) birds is insane overkill.

Please deny "consistency determination"

From:	Mariah Baird
To:	Farallon Islands Consistency
Subject:	Coastal Consistency Determination Farallon Islands National Wildlife Refuge: South Farallon Islands Invasive House Mouse Eradication Project
Date:	Monday, December 6, 2021 5:53:23 PM

I am writing in support of the South Farallon Islands Invasive House Mouse Eradication Project (Plan).

I urge the commission to concur with the U.S. Fish and Wildlife Service that the Plan is consistent with the enforceable policies of the California Coastal Management Program, and essential to protect the ecosystem of the Farallones.

- Implementation of the Plan is consistent with the goals of the Coastal Act ("protecting, enhancing and restoring coastal environmental quality and resources").
- Implementation of the Plan is essential to restore the ecosystem of the Farallones, to protect the pelagic birds that nest there, and the endemic Farallon salamander and daisy. The density of house mice on the islands (estimated at 504 per acre), is possibly the highest reported house mouse density estimate for any island in the world (FEIS, Section 2.8.2). The damage to the native wildlife from this out of control invasive species is unconscionable, and ongoing, absent the implementation of the Plan. The Plan includes extensive measures to protect native wildlife.
- Complete eradication of rodents, including invasive house mice, using brodifacoum has been achieved on islands throughout the world, including in the Channel Islands.
- The one-time, controlled, use of brodifacoum will have limited effects on individual birds, and no lasting effects on the bird population. The limited impacts will be far outweighed by the benefits.
- Contraception will not work. There is no evidence that contraception is available, proven, or feasible to eradicate the house mice. The contraceptive chemical has been only tested and approved for rats. House mice will not consume the chemical regularly enough for it to be effective, and placing the bait would be dangerous to people, and disruptive to the environment. The mice must be eradicated.

Thank you for your time and consideration.

Mariah Baird

San Rafael, California

From: Molly Brown
To: Energy@Coastal
Subject: Deny South Farallon Islands Invasive House Mouse Eradication Project.
Date: Sunday, November 28, 2021 4:51:32 PM

Coastal Commissioners:

The Farallon Islands deserve the many layers of protection they have received over the years, including the designations as a National Marine Sanctuary and a National Wildlife Refuge. The Coastal Commission must continue these protections by banning the use of deadly environmental poisons on these islands.

The proposed anticoagulant rodenticide poison, brodifacoum, was banned in California by legislation passed and signed into law in 2020, because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats, and other predators tested in WildCare in Marin County have this poison in their blood.

It is impossible to ensure that the massive dose of poison proposed to be strewn across the South Farallon island will remain there, only affecting the mice it is intended to kill. The poison will spread into the water and kill marine life. It will be in the bodies of birds leaving the island, such as Western Gulls that frequent the islands. They will carry the poison far and wide, where it will travel up the food chain, and kill or weaken many non-target animals. Trying to frighten hungry gulls away by hazing won't work--any wildlife biologist can tell you that!

A comprehensive IPM rodent reduction and removal strategy is a much saner approach, including relocation of the 6 to10 Burrowing Owls that threaten endangered seabirds. This would allow natural predation to gradually reduce the rodent population while improving the seabird population. Cooperate with nature: don't allow the poisoning of this fragile ecosystem and everything around it!!

The California Coastal Commission should protect our beautiful coast, not condone the use of deadly environmental poisons that cannot be contained on one island. You have a moral responsibility to protect the health of our coasts; please don't allow this apparent quick fix to short-circuit that responsibility.

We strongly urge you to deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project. Thank you for your consideration and your leadership through the years.

Sincerely,
Molly and Jim Brown
Mt Shasta CA

--

"The eyes of the future are looking back at us and they are praying for us to see beyond our own time…that we might act with restraint, that we might leave room for the life that is destined to come… Perhaps the wildness we fear is the pause between our own heartbeats, the silent space that says we live only by grace. Wilderness lives by this same grace. ~ Terry Tempest Williams, *Red,* p. 215.

Molly Young Brown, M.A., M.Div
722 Meadow Ave, Mount Shasta CA 96067
MollyYBrown@gmail.com
MollyYoungBrown.com

From:	welgoson@everyactioncustom.com on behalf of Stephen Welgos
To:	Farallon Islands Consistency
Subject:	Deny the proposal to aerially apply the toxic rodenticide brodifacoum
Date:	Tuesday, November 30, 2021 8:05:13 AM

Dear Farallon Islands,

Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean. There is no way to limit the impact to the targeted house mouse. A 2015 study conducted after aerial drop of rodenticides on Palmyra Island off the coast of Hawaii reported: "We documented brodifacoum [rodenticide] residues in soil, water, and biota, and documented mortality of nontarget organisms. Some bait (14–19% of the target application rate) entered the marine environment to distances 7 m from the shore. After the application commenced, carcasses of 84 animals representing 15 species of birds, fish, reptiles and invertebrates were collected opportunistically as potential nontarget mortalities. In addition, fish, reptiles, and invertebrates were systematically collected for residue analysis. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed. Although detection of residues in samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected."

For crying out loud, deny the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge. Globally significant wildlife populations inhabit the Farallones, including hundreds of thousands of seabirds and thousands of seals and sea lions. These include: 13 seabird species that nest on the islands; pinnipeds including Northern fur seals, Steller sea lions, CA sea lions, harbor seals, and northern elephant seals; and endemic species including white sharks, hoary bats, and arboreal salamanders.

Brodifacoum is a "second generation anticoagulant rodenticide" (SGAR) that is highly toxic to birds, mammals, and fish. It also poses a secondary poisoning risk to predators. The California Department of Pesticide Regulation quotes the FWS: "Secondary exposure to SGARs is particularly problematic due to the high toxicity of the compounds and their long persistence in body tissues. For example, brodifacoum, a common SGAR, is persistent in tissue, bioaccumulates, and appears to impair reproduction. Even in cases where the proximate cause of death has been identified as automobile strike, predation, or disease, toxicologists and pathologists have attained sufficient toxicological evidence to conclude that rodenticide-induced blood loss increased animal vulnerability to the proximate cause of death." The threat of secondary poisoning has led the state to ban the use of brodifacoum for almost all uses. Although this particular use is an exception, the risks of the use are extremely high.

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and attract an average of six burrowing owls a year. Owls prey upon ashy storm-petrels when mouse populations drop during the winter, killing hundreds of petrels annually. The global population of the ashy storm-petrel is small (10,000 – 20,000), but it is not considered an endangered species.

As important as native ecosystems are, the application of a poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions.

Please deny a finding of consistency of the proposed aerial dispersal of the highly toxic rodenticide brodifacoum on the Farallon Islands and require that a Supplemental Environmental Impact Statement (SEIS) be conducted by an independent body examining alternatives, including the no action alternative and nontoxic integrated control methods. The SEIS should investigate the possibility of controlling the mice through controlled intensified predation by providing nesting boxes for barn owls and/or kestrels.

Thank you for considering this request.

Sincerely,
Stephen Welgos

From:	Lisa Leech
To:	Energy@Coastal
Subject:	Environmentally Devastating!
Date:	Thursday, November 25, 2021 5:53:12 AM

No Poison Drops Please!!!!
All birds and animals will be effected by this horrible method of rodent control! Please let nature take its course and let predators naturally control them as their food source!

Please let nature control the environment… it knows best!
Thank-you,
Lisa Leech
l_leech@yahoo.com

Sent from my iPhone

From:	Derek Hudgins
To:	Farallon Islands Consistency
Subject:	Eradicate the House Mouse
Date:	Monday, December 6, 2021 4:57:21 PM

Please choose to eradicate the invasive House Mouse. https://thecottonwoodpost.net/2021/12/05/restoring-southeast-farallon-island-thru-mouse-eradication-yes/?fbclid=IwAR03_oKQba4CGhWvYtSkisBz1yWUfXLd8fNjPFyXDIQUGW1GjrBqHxvGWLQ

Best regards,
Derek Hudgins
Baltimore, MD

Sent from my iPhone

From:	David OBrien
To:	Farallon Islands Consistency
Subject:	Eradication of harmful pests
Date:	Thursday, December 2, 2021 1:05:05 AM

Please allow the eradication of the mice which have tipped the ecosystem in a dangerous way and put a very endangered species at risk. The farallone islands, it's unique species ,and all who care and cherish this habitat deserve the chance to save it before it's too late.
Thankyou
David O'Brien

Sent from my iPhone

From:	Ray Sundby
To:	Farallon Islands Consistency
Cc:	JohnRothmann2@yahoo.com
Subject:	Farallon Island Mouse Problem
Date:	Tuesday, December 7, 2021 8:07:14 AM

I recommend trapping the mice. Here's a link to a better mouse trap video - https://www.youtube.com/watch?v=pHwvVPT202Y

Per Wikipedia the problem is approximately 60000 mice. As an example let's say you employed 100 of these traps, retail price $28.99 each. Of course the company might give you a steep discount for the promotional value of using their product for this project. Let's say each trap could catch an average of 25 mice per 2 day period. 60000 mice / 1250 per day = 48 days. If you had 5 volunteers servicing the traps (10 traps per person per day), the mouse problem would be mostly gone in less than two months. Drowned mice could be poured out on the ground or dumped in the ocean with no harm to other wildlife. No poison involved. If you asked for 5 gallon buckets to be donated I doubt you would have any problem securing hundreds of them.

John Rothmann,
I listened to Pat Thurston's radio show on this today. Please forward this email to her as I don't have her address.

Ray Sundby
Zip Code 95035
720-630-0083

From:	Kristen Gregoriev
To:	Farallon Islands Consistency
Subject:	Farallon Islands Rodent Eradication Plan - Please proceed!
Date:	Friday, December 3, 2021 1:14:00 PM

Coastal Commission:

Please proceed with the one time, highly regulated and monitored Mouse Eradication plan. Plans of this sort have been highly successful for the protection pelagic birds on other islands. The opposition to this plan has yet to present a workable, effective solution. The time to act is NOW!

Thank you.

Kristen Gregoriev

415-453-1775 Best Number-home!

628-877-9470 Cell

kgregoriev@gmail.com

From: sherry Weiland
To: Energy@Coastal
Subject: Farallon Islands
Date: Friday, November 26, 2021 2:12:10 PM

I am writing to voice my opposition to the dropping of poison on the Farallon Islands.
The Farallon Islands are designated a National Marine Sanctuary/National Wildlife Refuge. Poisons have no business being used there.
The poison to be used has in the past impacted many other species than the mice it is intended to kill, including raptors, fox, bobcat and other predators. The fact that the poisoned mice may be eaten by these predators is reason alone to condemn the project. Particularly in the case of raptors, who can fly wherever they want and transmit the poison to other areas.
There are many other ways to control a mouse population. Poison should never be used in my opinion as it can have devastating unintended effects on our environment and on species that we should be protecting. Our planet is at a tipping point and we must think of environmental impacts of our actions if we want the chance to save it.

Sincerely,
Sherry Weiland

Sent from my iPad

From: Carol Hiestand
To: Energy@Coastal
Subject: Farallon Islands
Date: Thursday, November 25, 2021 9:55:47 AM

I am very dismayed by the plans to drop rodenticide on these islands, which everyone knows is very toxic and spreads easily up the food chain, killing many more creatures than intended. Please come up with an alternative plan to control the rodents; this one is horrifically wrong and will be a disaster!
Thank you, Carol Hiestand and Family

From: virgene link
To: Energy@Coastal
Subject: Farallon Islands
Date: Wednesday, November 24, 2021 3:35:09 PM

To Whom It Concerns:

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.

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.

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.

Poison is indiscriminate and moves up the food chain. Please do not even consider this.

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?**

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,

Virgene Link-New
Anacortes, Wa.

From: Dirk Rogers
To: Energy@Coastal
Subject: Farallon Islands
Date: Sunday, November 28, 2021 7:57:41 AM

Using anticoagulants to kill rodents is a scorched earth approach and has failed before. Leaving precious land,water,and life forms toxic is an example of pathological short sightedness.Deny this brutal eradication project.

Dirk Rogers RN Retired

From:	Michael Parr
To:	Farallon Islands Consistency
Subject:	Farallon Mouse Removal
Date:	Monday, December 6, 2021 4:39:31 PM

To whom this may concern,

I would like to voice my support for the removal of mice from the Farallon Islands. The world is full of mice but very few Ashy Storm Petrels exist anywhere.

Thank you.

Michael J. Parr (birder)
4446 Alabama Avenue, SE
Washington, DC 20019
202 684 5805

From:	Heather Hawkins
To:	Farallon Islands Consistency
Subject:	Farrallon Islands Wildlife Refuge
Date:	Thursday, December 2, 2021 12:48:07 PM

Please move forward with the Fish and Wildlife Service's Mouse Eradication Plan for the Farrallon Islands to fix it's impaired ecosystem. The plan is sound and will do much good to protect this important wildlife refuge.

Sincerely,

Heather Hawkins

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: FARALLON ISLAND POISON-DROP
Date:	Wednesday, December 1, 2021 2:15:01 PM

From: Deidre Green <deidregreen@aol.com>
Sent: Wednesday, December 1, 2021 10:14:52 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: RE: FARALLON ISLAND POISON-DROP

PLEASE DO NOT POISON THE FARALLON ISLANDS in your house-mouse propped eradication.

deidregreen@aol.com
(415) 457-5526
www.deidregreen.com

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: about the Farallon Islands, please
Date:	Wednesday, December 8, 2021 11:06:51 AM

From: Marlene A Condon <marlenecondon@aol.com>
Sent: Wednesday, December 8, 2021 7:06:39 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: about the Farallon Islands, please

To Whom It May Concern:

I am asking that you decide against poisoning the rodents on the Farallon Islands. I haven't time to write much, so please accept my list of reasons below as being of the utmost sincerity despite their brevity.

(1) Humans are supposed to be *humane*. It's morally wrong to use poison to kill animals as they suffer a horribly painful death, and we should be better than that.

(2) It should *never* be considered tolerable to accept collateral damage. In a world of rapidly disappearing wildlife of all sorts, it's especially disturbing that you would do something that kills non-target animals as well as the target species.

(3) If I understand this situation correctly, mice have been on these islands for quite a long time without presenting a problem for the species you are trying to aid. Perhaps the motives of those folks pushing to get rid of these rodents need a more in-depth examination to see if their concerns are valid and justify such extreme action.

Thank you ever so much for your time and consideration of my comments. I deeply appreciate both.

Sincerely,
Marlene

Marlene A Condon, Author and Photographer, *The Nature-friendly Garden: Creating a Backyard Haven for Plants, Wildlife, and People* (Stackpole Books, 2006)
Newspaper Nature Columnist
5554 Sugar Ridge Road
Crozet, VA 22932-2204

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: AGAINST RAT POISON
Date: Saturday, December 4, 2021 8:43:34 PM

From: Candace Krout <candacek@sonic.net>
Sent: Sunday, December 5, 2021 4:43:26 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: AGAINST RAT POISON

Dear Commissioners,

This is a brief note to voice my objection to dropping tons of rat poison on the Farallones.
It will create secondary killing of nontarget species like raptors.

Please find another solution.

Thank you,
Candace Krout
Santa Rosa, CA

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Comment on Farallon Islands pesticide air drop
Date:	Wednesday, December 8, 2021 11:44:05 AM

From: Sally Stephens <sally.stephens.sf@gmail.com>
Sent: Wednesday, December 8, 2021 7:43:50 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Comment on Farallon Islands pesticide air drop

California Coastal Commission,

Please oppose the proposed project to aerial bomb rodenticides on the Farallon Islands to eradicate mice. This indiscriminate air-drop of highly toxic rodenticide will kill hundreds if not thousands of non-target birds either directly or by eating poisoned mice. The poison will get into other invertebrates and Dungeness crab who eat either the poison itself or the poisoned mice. Birds and marine mammals that eat those invertebrates and crabs will themselves be poisoned, spreading the poison into the food chain and the ecosystem. This is unacceptable.

The alleged intent of the aerial poisoning is to kill the few burrowing owls who eat mice and also eat birds and chicks of other bird species. It makes more sense to remove those few burrowing owls, rather than poison an entire ecosystem.

Please do not allow this misguided project to proceed. Please do not allow toxic rodenticides to be spread indiscriminately on a relatively pristine environment. The unintended consequences are much too serious. We should be limiting use of these toxic rodenticides/pesticides/herbicides in all aspects of our lives. Please do not allow this to happen on the Farallon Islands. This project will do a lot of harm to all life on the Farallons and in the surrounding seas, for a very small alleged (and, frankly, unlikely) benefit. If you care at all about the environment, do not allow this indiscriminate, random poisoning to happen.

Sally Stephens
San Francisco, CA

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Sunday, December 5, 2021 4:38:51 PM

From: Lonnie Gordon <magiclg@verizon.net>
Sent: Monday, December 6, 2021 12:38:31 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Dear California Coastal Commissioners,

It is hard for me to even fathom who came up with this moronic and potentially devastating idea to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge off the Northern California coast.

You cannot, using common sense and your sense of duty to our environment and it's inhabitants, approve of this suggested action. I know you are intelligent people, and you have to listen to these types of suggestions, but I also believe that you are smart enough to recognize the far reaching consequences of approving such an action.

We are losing our wildlife, worldwide, at an alarming rate. Do not add to the problem. Please vote NO on this.

Sincerely,

Ms.Lonnie Gordon
6804 Las Olas Way
Malibu, Ca 90265
310 457-2725

"The world is not dangerous because of those who do harm,
but because of those who look at it without doing anything".
Albert Einstein

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Sunday, December 5, 2021 8:44:01 AM

From: Shea Millan <shea.meara@gmail.com>
Sent: Sunday, December 5, 2021 4:43:44 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Dear California Coastal Commission,

I am writing as a concerned citizen in opposition of the U.S. Fish and Wildlife Service's plan to drop deadly poison on Farallon Island in an attempt to control the mice population. This decision would not just harm the mice in this Marine Sanctuary. ALL wildlife would be poisoned if this occurs. Rodenticides move up the food chain and kill not only the rodent, but also the wildlife that eats the rodent and so on.

I'm asking you to please not let this terrible plan become reality. Please consider all of the wildlife that would be harmed by this poison, in what is supposed to be a sanctuary.

Thank you for your time and consideration,
Shea Millan
Sierra Club Member

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Saturday, December 4, 2021 4:04:19 PM

From: Bambi Corso-Steinmeyer <bambicorso@gmail.com>
Sent: Sunday, December 5, 2021 12:04:01 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

To Whom it May Concern,

I am writing to not only encourage you, but to plead with you to not sign the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge off the Northern California coast.

These poisons are completely destroying our wildlife and an action like this would be inexcusable and irresponsible as these poisons move up and out of the food chain killing unintended victims.

PLEASE do not allow this to happen. There are so many safe alternatives to rodent poisons. As a species we must do better than this! The poisoning has got to stop!!!

Thank you for your time,
Bambi Corso-Steinmeyer

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: December 2021 agenda item Thursday 11b - CD-0006-21 (US Fish & Wildlife Service, San Francisco)
Date:	Sunday, December 5, 2021 9:50:59 AM

From: Parker Deay <spdeay@gmail.com>
Sent: Sunday, December 5, 2021 5:50:50 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: December 2021 agenda item Thursday 11b - CD-0006-21 (US Fish & Wildlife Service, San Francisco)

Please do not drop poison onto the Farallon Islands. I understand you are worried about the mice, but I am very very concerned about the other animals that will end up being affected. Thank you.

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: December 2021 Agenda item Thursday 11b-CD-0006-21 (US Fish and Wildlife Service, San Francisco)
Date:	Tuesday, December 7, 2021 6:14:46 AM

From: Ed Kish <ed@kishrigging.com>
Sent: Tuesday, December 7, 2021 2:14:39 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: December 2021 Agenda item Thursday 11b-CD-0006-21 (US Fish and Wildlife Service, San Francisco)

Dear Coastal Commission

Please seriously consider intensified predation though the implementation of nesting boxes in place of toxic poison to control mice on the Farallons

Ed Kish
805 501 8017 M
290 Ferro Drive,
Ventura, CA 93001

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallon Island Rodenticide Application
Date:	Friday, December 3, 2021 10:08:13 AM

From: Kate Stowe <rainmudtrees@yahoo.com>
Sent: Friday, December 3, 2021 6:08:07 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallon Island Rodenticide Application

Dear Friends,

I am writing to urge you to oppose the proposed rodenticide drop on the Farallon Islands. I am deeply concerned about the downstream unintended consequences of Brodifacoum on the many life forms that call Farallon home.

Thank you for being in a position to read this email--for the work and care you've undertaken to be where you are in life.. And I respectfully ask that you look to other methods of rodent control--such as contraceptive bait--to help rebalance the Farallon ecosystem so threatened species, and the ecosystem as a whole can thrive.

With respect,

Kate Stowe

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallon Islands concerns
Date:	Friday, December 3, 2021 8:06:06 AM

From: Mary Jo <mjrousseau2001@yahoo.com>
Sent: Friday, December 3, 2021 4:05:56 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallon Islands concerns

Coastal Commissioners:

The Farallon Islands deserve the many layers of protection they have received over the years, including the designations as a National Marine Sanctuary and a National Wildlife Refuge. The Coastal Commission must continue these protections by banning the use of deadly environmental poisons on these islands.

The proposed anticoagulant rodenticide poison, brodifacoum, was banned in California by legislation passed and signed into law in 2020, because of the documented impact on predators up the food chain. 76% of raptors, foxes, bobcats, and other predators tested in WildCare in Marin County have this poison in their blood.

It is impossible to ensure that the massive dose of poison proposed to be strewn across the South Farallon island will remain there, only affecting the mice it is intended to kill. The poison will spread into the water and kill marine life. It will be in the bodies of birds leaving the island, such as Western Gulls that frequent the islands. They will carry the poison far and wide, where it will travel up the food chain, and kill or weaken many non-target animals. Trying to frighten hungry gulls away by hazing won't work--any wildlife biologist can tell you that!

A comprehensive IPM rodent reduction and removal strategy is a much saner approach, including relocation of the 6 to10 Burrowing Owls that threaten endangered seabirds. This would allow natural predation to gradually reduce the rodent population while improving the seabird population. Cooperate with nature: don't allow the poisoning of this fragile ecosystem and everything around it!!

The California Coastal Commission should protect our beautiful coast, not condone the use of deadly environmental poisons that cannot be contained on one island. You have a moral responsibility to protect the health of our coasts; please don't allow this apparent quick fix to short-circuit that responsibility.

We strongly urge you to deny consistency to the South Farallon Islands Invasive House Mouse Eradication Project. Thank you for your consideration and your leadership through the years.

Heartfelt thanks and consideration,
Mary Jo Rousseau

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallon Islands rodenticide project proposal
Date:	Wednesday, December 1, 2021 9:09:24 PM

From: Jim <homegrown53@hotmail.com>
Sent: Thursday, December 2, 2021 5:09:12 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallon Islands rodenticide project proposal

There are many reasons why I oppose the Farallon project, but whomever is tasked with "capturing" public comment on this proposal would likely do so with the essay I could write in a way that would oversimplify it and/or misrepresent it,

so, to minimize the risks both of my valuable time being wasted and the pig being annoyed, the following characterization (the wording for which I borrow from another author) argues the root of it sufficiently to serve as proxy:

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 nearly 200 years and is therefore fully integrated into the food web. There are millions of sea birds and mammals living on the Farallons. They are the best testament to the fact that mice have not been harmful to birds and other animals on the Farallons. 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.

Jim Wells
541 968 8035

Hello, NSA and other snoops of all trump suits! Auto-place it where the sun don't shine, ya' scurvy dawgs.

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Farallon rodenticides
Date: Friday, December 3, 2021 12:06:52 PM

From: Steve Tyler <abc3dtd@gmail.com>
Sent: Friday, December 3, 2021 8:06:37 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallon rodenticides

I've been to the wildlife rich Farallon Islands. This is no place for highly toxic rodenticides. They've been used by Canadian and other governments with devastating results. While not an expert, I'm well aware there are other means of control, contraceptives for one. Even if more costly, this would be far better than the negative consequences of rodenticides.
Respectfully
Steve Tyler
2564 Franki
Orange CA 92865
657 236 7354

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallong Islands, from EGBPA/DSC
Date:	Wednesday, December 1, 2021 1:20:07 PM

From: beneficialbug@sonic.net <beneficialbug@sonic.net>
Sent: Wednesday, December 1, 2021 9:19:58 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallong Islands, from EGBPA/DSC

East Bay Pesticide Alert (also known as Don't Spray California)

Comments on Farallon Islands EIS December , 2021

Regarding Rodenticiding Plans:

To whom it may concern of the California Coastal Commission:

I will submit short comments on behalf of this grassroots group which already lost one person to death from Multiple Chemical Sensitivity via kidney complications. While barb wilkie identified the origins of MCS in her as from a perfume-wearing co-worker in a government agency office, where her supervisors refused to stop from wearing these toxic chemicals, the very building in which she was working, a government building, was pesticided regularly. Further, some kind of pesticide was injected into trees outside her house by a governmental agency and she became sicker, still. We lost a great person in barb's being sacrificed to the chemical world which has damaged so many of us, most of the core of the original EBPA.

I lived in wine country, in the Carneros region of the southern Sonoma Valley off of Hwy 121. One of our nearest toxic growers used rodenticides, as well as other pesticides. The list was long. But by 1998, before I got my kids out of there, and 4 other families moved from that toxic hellhole, we watched raptors disappear. While the whole valley and county, and Napa County, were full of illness and early death whether to cancers, Parkinson's, ALS, or Thyroid problems, we also had massive bee die-offs, and a herd of goats die overnight when they got run-off from that nearest grower. This grower, among many, used strychnine which he planted into rodent holes. This guy had inherited the land a few years earlier, was toxic top to bottom, and when he wasn't shooting starlings whom he said had no business eating even one grape, he was poisoning the raptors via poisoning rodents.

The killing mindset is what has led to all this pesticide use and a sense that humans should control everything. There are Rights of Nature, which many Indigenous people are pursuing politically and legally, but there is just plain science which shows that, while you want to eradicate, you cannot, actually. The old line, Nature Abhors a Vacuum, is in place. You try to kill all and what you do is kill the weakest and the strongest survive and re-populate. We have endless examples of this: "Superweeds", antibiotic resistance, more mosquitoes where mosquito pesticiding has been done, such as in Florida.

This eradication mentality is of a mentality of empire. Humans in western and some other cultures have lost much touch with how Nature actually works, We would not have survived throughout evolution had people tried to kill everything around them, to try to control everything around them. People have tried to separate from Nature and feel powerful; yet, we see that Nature has her own actions and can repair when humans get out of the way. All we have to do is look to photos of Spring, 2020, during shelters-in-place, to see photos of air pollution clearing and to understand humans' creation of problems. Or look at photos of forests after wildfires, especially where humans have not altered things more by "clearing" dead trees which have their own purposes in Nature. Humans only off to the

side results in Nature being able to bring back some balance. After the shelters-in-place, immediately people resumed so much driving, so much flying, so many other toxic endeavors, and we've faced some of the worst toxic pollution imaginable around the U.S. where trees are under attack for supposedly not being "native", or "invasive", which is how pesticide companies came up with marketing to people after so many were going back to the land from cities, and growing without toxics, creating the Organics movement. The pesticide industry simply pivoted like any good, unethical business would, and created a new market by scaring people, by the way cashing in one racism. So they use language built to have people associate "foreign" or "exotic"

The answer to the perceived problem on the Farallon Islands is to step back, let Nature take her course, and recognize that the real problem here is trying to stop natural changes which occur, trying to make the Farallon Islands into a museum. A museum of dead rodents and dead birds killed by humans is not a museum worth experiencing. Most of us find game hunting for pleasure a sickness. This is no different except in that the poisons drift and translocate into soil, water, air, to poison people and flora and fauna even thousands of miles away.

Just step back and learn about Nature's ways to understand natural succession and why restoration gardening projects and the like are dangerous, especially on a large scale as by governments trying to pretend that people can control everything, or should. We are but one species and for those in cultures and governments trying to control all, and by toxic means, even your own family members may die, or die far too early, as a result.

I don't believe that would be the aim of the California Coastal Commission, but as long as you participate in toxic endeavors, that could be the very personal result. You may want to review the work of toxicologist Mark Lappe who, sadly, was killed by the very pesticides used by governmental agencies which he had exposed. Please do not continue this toxic legacy.

Sincerely,

Maxina Ventura, founder

East Bay Pesticide Alert / Don't Spray California

Berkeley, CA

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

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: FWS proposal to use poison on Farallon Islands
Date:	Thursday, December 2, 2021 5:39:19 PM

From: David Shellenberger <dshell99@gmail.com>
Sent: Friday, December 3, 2021 1:38:37 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: FWS proposal to use poison on Farallon Islands

I oppose the use of any rodenticide. In addition to causing secondary and environmental poisoning, the use is inhumane. Conservation should be compassionate; hence the field of compassionate conservation.

David E. Shellenberger
Advocate for International Animal Welfare
Bethel, Connecticut

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!

From:	ExecutiveStaff@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Hello from the Contact Page
Date:	Monday, December 6, 2021 5:39:48 PM

From: Lisa Golden <ljgmee@gmail.com>
Sent: Saturday, December 4, 2021 2:19 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Hello from the Contact Page

Project Name and Application Number:Farallons

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

Date and Time Requested: Dec. 16

Full Name:Lisa Golden

Email:ljgmee@gmail.com 707838-8089

On Behalf Of: California Citizens

Comments: No POISION drop on the Farallons .

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Letter of Support of Farallons plan
Date: Wednesday, December 1, 2021 3:26:32 PM

_____
From: Omid Sarv <heyitsomid@yahoo.com>
Sent: Wednesday, December 1, 2021 11:25:50 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: Letter of Support of Farallons plan

Hi,
I saw surfrider post on its Instagram to oppose this but I've heard really beneficial things regarding these types of programs for the health of birds and the like. I wanted to share my support and express my disappointment in surfrider SF for the uneducated post.
Thanks,

Omid Sarvian

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: My Opposition to the Proposed Farallon Islands Poison Drop
Date:	Wednesday, December 8, 2021 11:37:20 AM

From: Jordan Salmanowicz <jsalmanowicz@gmail.com>
Sent: Wednesday, December 8, 2021 7:37:05 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: My Opposition to the Proposed Farallon Islands Poison Drop

Dear Honorable Members of the California Coastal Commission,

My name is Jordan Salmanowicz Longever, and I write to you today to ask that you stop the proposed poison drop on the Farallon Islands.

The Farallon Islands, breathtakingly gorgeous and wild, must be protected at every turn. This beautiful piece of nature right off the coast has been rightfully designated a National Marine Sanctuary and National Wildlife Refuge. Therefore, no environmental poisons should ever be used on these lands - particularly poison that has already been outlawed in 2020 legislation passed and signed by Gov. Newsom. To kill animals and poison animals all the way up the food chain, and possibly poison and kill marine life in reserved, sanctuaried areas, including seagulls and other birds going to and from the islands, is to unleash a widespread assault on those we are meant to protect in these safeguarded zones.

Poison is not the answer. Too often, these poisons do not even work, and must be reapplied, thus poisoning the entire ecosystem over and over. Why poison an entire ecosystem at all? Why agree to a plan that will likely require it to be poisoned repeatedly?

Please dent consistency to the South Farallon Islands Invasive House Mouse Eradication Project.

Thank you very much for your consideration.

All my best,

Jordan Salmanowicz Longever

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: No Brodifacoum
Date:	Monday, December 6, 2021 10:39:03 AM

From: garrett5@comcast.net <garrett5@comcast.net>
Sent: Monday, December 6, 2021 6:38:50 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: No Brodifacoum

Dear Commissioners,

I live in California and care deeply for finding a better solution than dropping Brodifacoum onto the Farallon Islands. I am strongly against the use of rodenticides as a solution, please do not pass this proposal.

Sincerely,
Maureen Garrett

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: No Drop - Stop the poison
Date:	Saturday, December 4, 2021 12:21:54 PM

From: Kelly Chien <hsinyingchien@gmail.com>
Sent: Saturday, December 4, 2021 8:21:37 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>; Farallon Islands Consistency <farallonislands@coastal.ca.gov>
Subject: No Drop - Stop the poison

Hi,

I am opposed to the poison drop at the Farallones. This will bring so much harm to the entire ecosystem and surrounding water, animals and environment. Please refrain from proceeding with this plan.

Thank you for your consideration.

Best,
Kelly

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: No Drop - Stop the poison
Date:	Saturday, December 4, 2021 12:24:51 PM

From: Vincent Scopino <vrock1@gmail.com>
Sent: Saturday, December 4, 2021 8:24:34 PM (UTC+00:00) Monrovia, Reykjavik
To: Kelly Chien <hsinyingchien@gmail.com>
Cc: Energy@Coastal <EORFC@coastal.ca.gov>; Farallon Islands Consistency <farallonislands@coastal.ca.gov>
Subject: Re: No Drop - Stop the poison

No YOU stop rodenticide!

On Sat, Dec 4, 2021, 12:21 PM Kelly Chien <hsinyingchien@gmail.com> wrote:

> Hi,
>
> I am opposed to the poison drop at the Farallones. This will bring so much harm to the entire ecosystem and surrounding water, animals and environment. Please refrain from proceeding with this plan.
>
> Thank you for your consideration.
>
> Best,
> Kelly

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: No poison drop!
Date:	Wednesday, December 8, 2021 6:49:06 AM

From: KATHLEEN SHABI <shathorpe@aol.com>
Sent: Wednesday, December 8, 2021 2:49:00 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: No poison drop!

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.

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: No rodenticide on the Farallons
Date:	Wednesday, December 8, 2021 8:47:27 AM

From: Kim Klein <kim@kleinandroth.com>
Sent: Wednesday, December 8, 2021 4:47:21 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: No rodenticide on the Farallons

Please please please do not poison the mice on the Farallons with rodenticide. The consequences to gulls and other birds (that your plan is theoretically saving) could be enormous. The mice have co-existed with the birds out there since mice were first introduced. They are a problem, to be sure, but the solution should not be worse than the problem nor create other problems.
Thank you for your consideration.
Kim Klein
PO Box 720
Point Reyes Station , CA 94956

Kim Klein (she,her, hers)
510-821-1516

"The words we speak become the house we live in" Hafiz

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: NO TO RODENTICIDE
Date:	Wednesday, December 8, 2021 10:52:22 AM

From: Kevin Anderson <kevin@dailyacts.org>
Sent: Wednesday, December 8, 2021 6:51:58 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: NO TO RODENTICIDE

Dear California Coastal Commission,

Please take my comments into consideration when evaluating the proposed project on the Farallon Islands. I hope the Coastal Commission will confirm their lack of support of the project at your December 2021 meeting.

Thank you for your consideration.

Public Comment on Farallon Islands 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 and by similar projects elsewhere in the world.
The EIS clearly states that mice are not harming birds or chicks, the claimed beneficiaries of this project. The EIS clearly states that a small population of burrowing owls is blamed for eating birds and chicks of other bird species. Removing the owls from the Farallon Islands is the non-toxic solution to the perceived problem. Yet, *"...translocation of burrowing owls in lieu of eradicating mice was not considered as an alternative."* (pg 47) The EIS then contradicts itself by offering translocation as mitigation for anticipated collateral bird mortality: "*Migrant species including burrowing owls would be*

transported off the island released into suitable habitat on the mainland." (pg 73) Translocation is possible, but eradicating non-native mice is clearly the objective, not protecting bird species. The mice are prey to many bird species. Their loss will harm birds, not help them.
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 being killed by the poison. Details on that issue are provided below.

These are the inadequacies of the EIS for this project:

Resident Burrowing Owls should be removed from Farallon Islands

The owls are the predators of the ashy 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 easier and less deadly to every animal living on the islands.

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 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."* 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

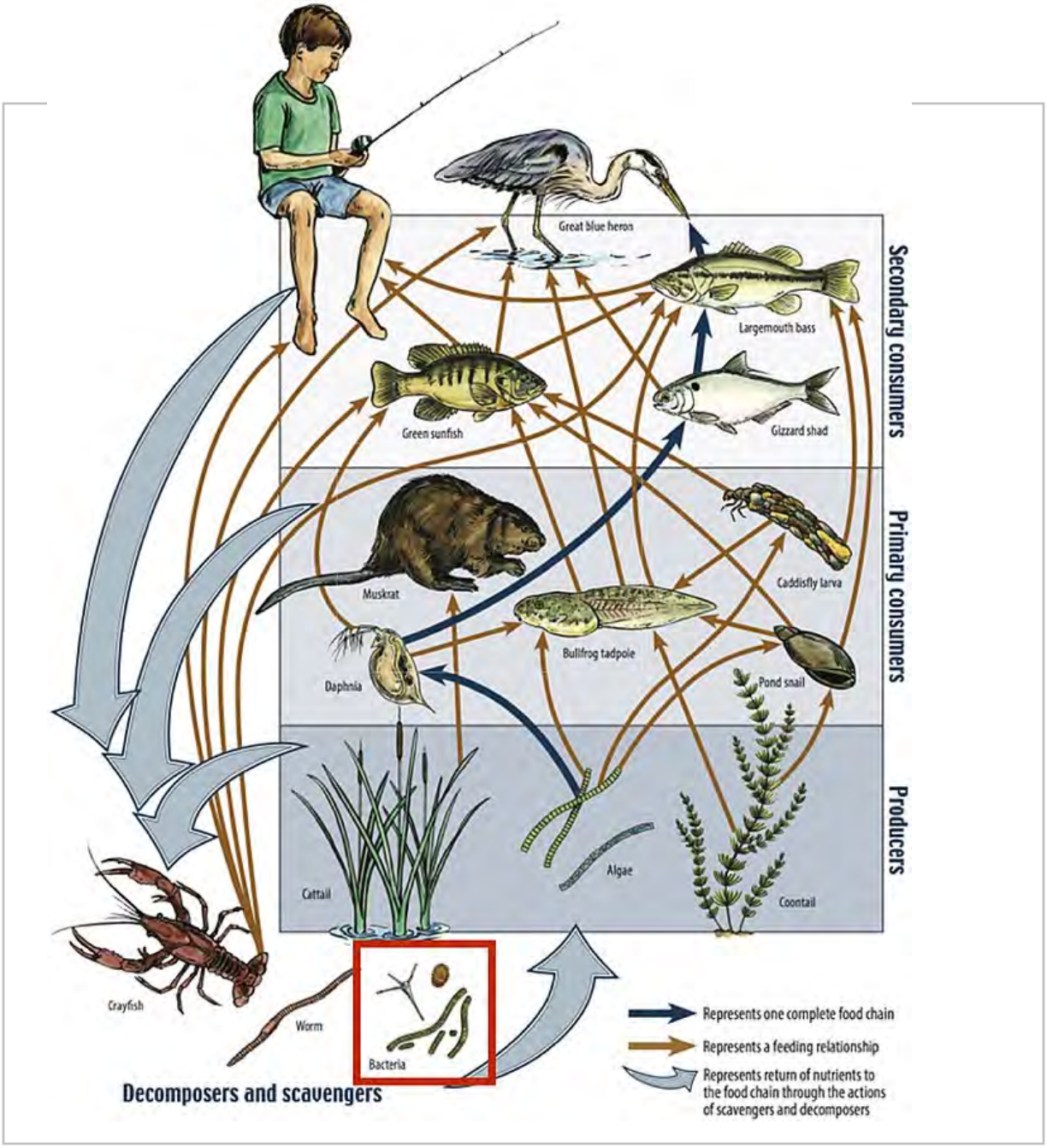
pint-sized, ground-dwelling burrowing owls.

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."

Disrupting the Food Web

The EIS 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.



This depiction of a fresh-water aquatic food web is an example of the complexity of food webs. The food web on the Farallon Islands is probably very different, but remains largely unknown because the EIS does not analyze it or describe it. Source: Creative Commons-Share Alike

According to the EIS, 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 EIS 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 EIS does not address the important question of what birds of prey will eat if mice are eradicated.

Given that mice are expected to survive for 21 days after being poisoned, and the poison is expected to be effective for over 100 days, it is more likely that many birds of prey will be killed by eating poisoned dead or dying mice. The number of days the rodenticide is expected to be effective exceeds the known limits of hazing effectiveness. For that reason, the EIS says the project will "attempt" to capture raptors present on the island prior to and during bait application. An unsuccessful "attempt" will result in the death of raptors.

There are also many animals living on the Farallons that could eat the poison or the poisoned mice, but not killed by the poison, such as invertebrates and Dungeness crabs. Although they are not killed, they would be contaminated by the poison they eat and become killers of the animals that eat them, such as birds and marine mammals.

The EIS states that many of the insects that live on the Farallons are detritivores that feed on decomposing carcasses, such as the poisoned mice. Then they become killers of the warm-blooded animals that eat them. The Farallon Islands are located within the Dungeness crab fishery. If they are contaminated by poison pellets or fish, they could become killers throughout the fishery. According to the EIS, *"Adult crabs are opportunistic feeders, but prefer clams, fish, isopods and amphipods. Cannibalism is common. Several species of predators feed on Dungeness crabs, especially the pelagic larvae and small juveniles, including octopuses, larger crabs and predatory fish such as salmon, flatfishes, lingcod, cabezon and various rockfishes. They are numerous in offshore areas of the Gulf of the Farallones, and support one of the most productive fisheries in California."*

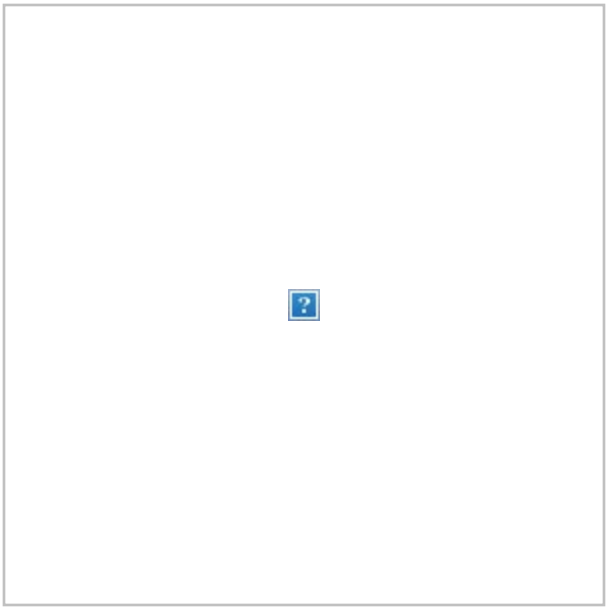
A similar mistake was made by a rat eradication project on the Palmyra atoll. The first attempt to eradicate the rats in 2002 failed partly because Palmyra's abundant land crabs outcompeted the rodents for the poisonous bait. The crabs' physiology allowed them to eat the poison—the anticoagulant brodifacoum—without 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 perpetual pesticide treadmill. The result is a poisoned environment that is dangerous to every living plant and animal on the island.

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.*" 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.

Rodenticides are known killers of birds of prey

This article 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.'*" We know that 46 bald eagles and over 420 seabirds were killed by the rat eradication attempt on Rat Island in Alaska, but we don't know how many more were contaminated with rodenticide and are handicapped by sub-lethal effects.



Source: Beyond Pesticides

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 run and are immediately done again. Lehua is one of the Hawaiian Islands on which extermination was attempted and failed. An evaluation of that attempt was published in 2011 to determine the cause of the failure so that a subsequent attempt would be more successful. That evaluation included this report on the success of similar attempts all over the world: "An analysis of 206 previous eradication attempts against five species of rodents on islands using brodifacoum or diphacinone is presented in an appendix to this report. For all methods, 19.6% of 184 attempts using brodifacoum failed, while 31.8% of 22 attempts using diphacinone failed." The Farallons project plans to use brodifacoum.

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* 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, has only occasional

visitors, and its steep, rocky terrain is not easily monitored. New mice or rats could be undetected on the Farallons long before anyone would know it.

Rats reappear on Lord Howe Island for the first time since 2019 eradicat...

Genetic test will uncover if two rats that were caught and killed are new incursion or survivors of the controve...

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 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 nearly 200 years and is therefore fully integrated into the food web. There are hundreds of thousands of sea birds and mammals living on the Farallons. They are the best testament to the fact that mice have not been harmful to birds and other animals on the Farallons.

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.

In hope and gratitude,

Kevin

--
Kevin Anderson (he/they)
Daily Acts | ECO2school Program Coordinator
m: 650-272-8820
www.dailyacts.org

"May what I do flow from me like a river, no forcing and no holding back, the way it is with children - Rainer Maria Rilke

Land Acknowledgement | My home office resides on the traditional homelands of the Southern Pomo tribal nation and I celebrate the active work of their descendants to preserve and nourish their indigenous identity.

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Objecting to the proposed poison drop on the Farallon Islands
Date: Tuesday, November 30, 2021 9:18:08 PM

From: Sophia Burton <greatbritishbakes@gmail.com>
Sent: Wednesday, December 1, 2021 5:17:31 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Objecting to the proposed poison drop on the Farallon Islands

I was so disheartened to hear that there is a proposal to poison the dormouse population on the Farallon Island. We know more today than ever before about the dangers associated with environmental poisons. It seems crazy that it is being considered for a National Wildlife Refuge just off our coast where other wild animals and birds might inadvertently consume the poison either directly or indirectly.

Please do not allow this monstrous proposal to go forward.

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: OPPOSED to RODENTICIDE USE: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Sunday, December 5, 2021 9:55:00 AM

From: Carrie Carrier <carrielcarrier2@gmail.com>
Sent: Sunday, December 5, 2021 5:54:17 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: OPPOSED to RODENTICIDE USE: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Dear California Coastal Commission,
I am writing to you from Topanga, California, an environmentally conscious coastal-mountain community located in the Santa Monica Mountains of Los Angeles County. We are extremely well-informed about the dangers of various rodenticides, especially the heightened dangers posed by first and second generation anticoagulant rodenticides. We have fought for years to combat these poisons in our County on account of the extremely well documented, severe impacts these poisons have on our local wildlife population. In particular, our threatened mountain lion population, most famously P-22 (the mountain lion of Griffith Park), has been documented by multiple environmental scientists to suffer from mange and other immune disturbances as a result of secondary poisoning from these compounds. A significant proportion of our mountain lion population has succumbed to SGARs poisoning after consuming prey that had ingested these rodenticides. Bobcats, coyotes, and several birds of prey have also been severely adversely impacted by these poisons.

We must permanently stop this cycle of poison. That can only happen when regulators and the public stand up and stop allowing the pesticide industry and the partners they have co-opted to keep proposing these toxic non-solutions. Use of these pesticides has generally proven to not only be ineffective but dangerous as well. Using large-scale pesticide applications to address environmental challenges does nothing more than: (1) provide pseudo green cover to a controversial and willfully dangerous industry; (2) produce excess profits for pesticide producers whose toxic products should frankly no longer be allowed in our environment (especially not a conservation site like this). Are we a bunch of eugenicists or a conscientious and thoughtful group of environmental leaders who can do better than blanketing the earth with literal poisons in the name of so-called environmental protection.

ABOUT THIS PROJECT
It is unconscionable that the US Fish and Wildlife Service (FWS) wants to bomb, via a helicopter drop, a Farallon Island off the coast of San Francisco in a Marine Sanctuary with 1.3 TONS of deadly poison to control the mouse population. That's absurd. It begins to make sense when you consider that this program was developed under Trump's FWS appointee, Aurelia Skipwith, a former Monsanto lawyer and scientist. She has since been replaced, but her toxic, industry-heavy imprint on the FWS remains.

ENVIRONMENTAL CONSIDERATIONS and ALTERNATIVES
Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean. There is no way to limit the impact to the targeted house mouse. A 2015 study conducted after aerial drop of rodenticides on Palmyra Island off the coast of Hawaii reported: “We documented brodifacoum [rodenticide] residues in soil, water, and biota, and documented mortality of nontarget organisms. Some bait (14–19% of the target application rate) entered the marine environment to distances 7 m from the shore. After the application commenced, carcasses of 84 animals representing 15 species of birds, fish, reptiles and invertebrates were collected opportunistically as potential nontarget mortalities. In addition, fish, reptiles, and invertebrates were systematically collected for residue analysis. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed. Although detection of residues in samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected.”

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and attract an average of six burrowing owls a year. Owls prey upon ashy storm-petrels when mouse populations drop during the winter, killing hundreds of petrels annually. The global population of the ashy storm-petrel is small (10,000 – 20,000), but it is not considered an endangered species.

As important as native ecosystems are, the application of a poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions. The SEIS should investigate the possibility of controlling the mice through controlled intensified predation by providing nesting boxes for barn owls and/or kestrels. In addition, some sort of contraception or sterilization of portions of the mouse population could be considered.

Poison should never be an option, and when it is treated like the "only option," it is clear that industry is working overtime behind the scenes to put together these ill-conceived and highly questionable proposals. **Please do not allow this toxic and industry-influenced program put forth by the FWS to proceed.**

Respectfully,
Carrie L. Carrier

--

Carrie L. Carrier
Topanga Town Council
NWF Certified Wildlife Habitat - Topanga Leader
Topanga Creek Watershed Committee, Chair
Email: contact@topangatowncouncil.org
Web: onetopanga.com

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Opposition to the Proposed Farallon Islands Poison Drop
Date:	Wednesday, December 1, 2021 9:27:59 AM

From: David Feldman <dfeldman@zfmicro.com>
Sent: Wednesday, December 1, 2021 5:27:50 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Opposition to the Proposed Farallon Islands Poison Drop

I am a resident of the San Francisco Bay area in San Mateo County. I am writing to voice my opposition to any use of poisons on the Farallon Islands.

The California Coastal Commission should not condone the use of deadly environmental poisons on these islands. It is impossible to ensure that these poisons will not be carried into the coastal waters by rains or onto other nearby regions of our coastline by birds who will undoubtedly consume animals that have ingested these toxins. If this occurs it will be a violation of the 2020, legislation passed and signed by Governor Newsom, outlawing the use of this very same poison in California. This impact on predators up the food chain will without question spread the poison into communities within flying range of the Farallon Islands and could affect humans and domestic pets as well.

The likelihood that this load of poison will remain on a single island, only affecting the rodents it is intended to kill, is preposterous.

The proposal to drop rodenticides on the Farallon Islands has been circulating for more than 10 years and has been a bad idea from the beginning. The commission is aware that there are better alternatives than additional poisoning of our ecosystem and to ignore them in favor of adding more poisons to our environment approaches malfeasance. Poison is not the answer.

Section 30001 of the California Coastal Act of 1976 states:

(a) That the California coastal zone is a distinct and valuable natural resource of vital and enduring interest to all the people and exists as a delicately balanced ecosystem.

(b) That the permanent protection of the state's natural and scenic resources is a paramount concern to present and future residents of the state and nation.

(c) That to promote the public safety, health, and welfare, and to protect public and private property, wildlife, marine fisheries, and other ocean resources, and the natural environment, it is necessary to protect the ecological balance of the coastal zone and prevent its deterioration and destruction.

(d) That existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone.

Section 30001.5 states "The Legislature further finds and declares that the basic goals of the state for the coastal zone are to: (a) Protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and

artificial resources."

Finally, Section 30003 states: "All public agencies and all federal agencies, to the extent possible under federal law or regulations or the United States Constitution, shall comply with the provisions of this division."

The charter of the commission is clear and no suspension of disbelief on the part of the members of the commission can rationalize away the fact that implementing the mass poisoning of an island on our coast in any way comports with stated goals of the California Coastal Act.

I urge the commission to do the right thing for the health of the environment and the people of California.

David L. Feldman
2050 Sharon Road
Menlo Park, CA 94025
Cell: 650-714-7470
dfeldman@zfmicro.com

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: PLEASE STOP POISON DROP ON FARALLONS DEC 16!
Date: Friday, December 3, 2021 2:46:20 PM

From: Mari Vlastos <marijean40@gmail.com>
Sent: Friday, December 3, 2021 10:46:10 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: PLEASE STOP POISON DROP ON FARALLONS DEC 16!

Poisoning so many animals and the environment on the Farallons is no way to curtail a single species, like the invasive house mice! PLEASE explore environmentally safe alternatives that have been proposed.

Mari Vlastos
Berkeley, CA

Harvey Breatt
Crockett, CA

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment in Opposition to Farallon Islands Project
Date:	Wednesday, December 1, 2021 5:24:18 AM

From: Mary McAllister <marymcallister@comcast.net>
Sent: Wednesday, December 1, 2021 1:24:03 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment in Opposition to Farallon Islands Project

Dear California Coastal Commission,

Please take my comments into consideration when evaluating the proposed project on the Farallon Islands. I hope the Coastal Commission will confirm their lack of support of the project at your December 2021 meeting.

Thank you for your consideration.

Public Comment on Farallon Islands 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 and by similar projects elsewhere in the world.
- The EIS clearly states that mice are not harming birds or chicks, the claimed beneficiaries of this project. The EIS clearly states that a small population of burrowing owls is blamed for eating birds and chicks of other bird species. Removing the owls from the Farallon Islands is the non-toxic solution to the perceived problem. Yet, *"…translocation of burrowing owls in lieu of eradicating mice was not considered as an alternative."* (pg 47) The EIS then contradicts itself by offering translocation as mitigation for anticipated collateral bird mortality: "*Migrant species including burrowing owls would be transported off the island released into suitable habitat on the mainland."* (pg 73) Translocation is possible, but eradicating non-native mice is clearly the objective, not protecting bird species. The mice are prey to many bird species. Their loss will harm birds, not help them.
- 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 being killed by the poison. Details on that issue are provided below.

These are the inadequacies of the EIS for this project:

<u>Resident Burrowing Owls should be removed from Farallon Islands</u>

The owls are the predators of the ashy 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 easier and less deadly to every animal living on the islands.

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 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 EIS 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 EIS, 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 EIS 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 EIS does not address the important question of what birds of prey will eat if mice are eradicated.

Given that mice are expected to survive for 21 days after being poisoned, and the poison is expected to be effective for over 100 days, it is more likely that many birds of prey will be killed by eating poisoned dead or dying mice. The number of days the rodenticide is expected to be effective exceeds the known limits of hazing effectiveness.[3] For that reason, the EIS says the project will "attempt" to capture raptors present on the island prior to and during bait application. An unsuccessful "attempt" will result in the death of raptors.

There are also many animals living on the Farallons that could eat the poison or the poisoned mice, but not killed by the poison, such as invertebrates and Dungeness crabs. Although they are not killed, they would be contaminated by the poison they eat and become killers of the animals that eat them, such as birds and marine mammals.

The EIS states that many of the insects that live on the Farallons are detritivores that feed on decomposing carcasses, such as the poisoned mice. Then they become killers of the warm-blooded animals that eat them. The Farallon Islands are located within the Dungeness crab fishery. If they are contaminated by poison pellets or poisoned fish, they could become killers throughout the fishery. According to the EIS, *"Adult crabs are opportunistic feeders, but prefer clams, fish, isopods and amphipods. Cannibalism is common. Several species of predators feed on Dungeness crabs, especially the pelagic larvae and small juveniles, including octopuses, larger crabs and predatory fish such as salmon, flatfishes, lingcod, cabezon and various rockfishes (Hankin and Warner 2001). They are numerous in offshore areas of the Gulf of the Farallones, and support one of the most productive fisheries in California."*

A similar mistake was made by a rat eradication project on the Palmyra atoll. The first attempt to eradicate 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 perpetual pesticide treadmill. The result is a poisoned environment that is dangerous to every living plant and animal on the island.[4]

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."*[5] 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.

Rodenticides are known killers of birds of prey

This article[6] 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.'"* We know that 46 bald eagles and over 420 seabirds were killed by the rat eradication attempt on Rat Island in Alaska, but we don't know how many more were contaminated with rodenticide and are handicapped by sub-lethal effects.[7]

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 run and are immediately done again.[8] Lehua is one of the Hawaiian Islands on which extermination was attempted and failed. An evaluation of that attempt was published in 2011[9] to determine the cause of the failure so that a subsequent attempt would be more successful. That evaluation included this report on the success of similar attempts all over the world: "An analysis of **206 previous eradication attempts against five species of rodents on islands** using brodifacoum or diphacinone is presented in an appendix to this report. For all methods, **19.6% of 184 attempts using brodifacoum failed, while 31.8% of 22 attempts using diphacinone failed.**" **The Farallons project plans to use brodifacoum.**

Some projects 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*[10] 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.

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 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 nearly 200 years and is therefore fully integrated into the food web. There are hundreds of thousands of sea birds and mammals living on the Farallons. They are the best testament to the fact that mice have not been harmful to birds and other animals on the Farallons.

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.

Mary McAllister
Oakland, CA

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[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

Mary Roach, *Fuzz*,

[4] https://www.sciencemag.org/news/2020/08/save-palm-filled-paradise-biologists-must-kill-trees

[5] https://www.marinij.com/2021/04/21/biden-administration-revives-farallon-islands-poison-plan/

[6] https://beyondpesticides.org/dailynewsblog/2021/04/study-finds-eagle-populations-experiencing-widespread-rodenticide-exposure/

[7] https://www.seabirdrestoration.org/pdf/RatIslandReview.pdf

[8] https://www.nationalgeographic.com/animals/article/160419-rats-exploded-poison-henderson-island

[9] https://scholarspace.manoa.hawaii.edu/handle/10125/50807

[10] https://www.theguardian.com/australia-news/2021/apr/19/rats-reappear-on-lord-howe-island-for-the-first-time-since-2019-eradication-program?fbclid=IwAR0Cb4gbBVczRz5ycKX4ggoXK2jlTk-Q4z2fJEmJJlH1UYf1i0Z4pgmbxYg

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21
Date:	Sunday, December 5, 2021 5:09:36 PM

From: Whitney Neufeld-Kaiser <whitney.n.k@gmail.com>
Sent: Monday, December 6, 2021 1:09:21 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21

Regarding the proposal to drop 1.3 tons of brodifacoum, a second-generation anticoagulant rodenticide, on the Farallon Islands: Please try and exhaust all other promising solutions first, such as rodent fertility control, and trapping and relocating the small flock of burrowing owls that come to the island to feed on the mice. The proposal as submitted has significant projected non-target mortality of other birds and animals from this powerful rodenticide, and there is potential for this poison to infiltrate terrestrial and aquatic food webs for a long time.

Thank you.
Whitney Neufeld-Kaiser
Seattle, WA
whitney.n.k@gmail.com

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Sunday, December 5, 2021 12:05:05 PM

From: K.L. Lyde <kllyde@gmail.com>
Sent: Sunday, December 5, 2021 8:04:55 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Cc: lisakrieshok@gmail.com <lisakrieshok@gmail.com>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

To Whom it May Concern:

With regard to a proposal by the US Fish and Wildlife Service to drop 1.3 tons of brodifacoum (a second generation anticoagulant rodenticide) by helicopter onto the Farallon Islands off the San Francisco coast, I strongly oppose such action. Due to the projected non-target mortality of other birds and animals from this powerful rodenticide, as well as this poison's potential to infiltrate terrestrial and aquatic food webs for a long time, I suggest that all other promising solutions should be tried and exhausted before poison is used, including rodent fertility control, and trapping and relocating the small flock of burrowing owls that come to the island.

Thank you for your attention to this matter.

kllyde@gmail.com

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Saturday, December 4, 2021 8:57:15 AM

From: Claudia Wornum <claudiawornum@comcast.net>
Sent: Saturday, December 4, 2021 4:57:08 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Yes, I'm cutting and pasting from the RATS newsletter but I believe their science !
Please do not proceed with this plan to eradicate the mice at the expense of multiple non-invasive and endangered species on the Island and surrounding waters!

I believe the science concerning the proposal by the US Fish and Wildlife Service to drop 1.3 tons of brodifacoum by helicopter onto the Farallon Islands off the San Francisco coast. Their goal is to eradicate the invasive house mice that attract burrowing owls to the island each winter as they make their way south. Owls attracted to mice sounds like a win-win (!), but if the mouse population crashes, the owls can sometimes prey on the Ashy Storm-Petrel, an endangered seabird, that nests on the island.

Due to the projected non-target mortality of other birds and animals from this powerful rodenticide, as well as this poison's potential to infiltrate terrestrial and aquatic food webs for a long time, we believe that all other promising solutions should be tried and exhausted before poison is used, including rodent fertility control, and trapping and relocating the small flock of burrowing owls that come to the island.

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 3, 2021 12:42:20 PM

From: Mark Rauzon <mjrauz@aol.com>
Sent: Friday, December 3, 2021 8:42:10 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Please support this effort to eradicate house mice on the Farallon Islands in an attempt to save the Ashy Storm-Petrel that is depredated by these invasive rodents. No one likes to use poison, but sometimes it is necessary, like chemotherapy, to cure a larger systemic dysfunction which in this particular case is saving one of the rarest storm-petrel species that are in decline throughout their range, restricted to the California Current. Recent rodent eradications like South Georgia, Macquarie and Gough Island in the southern hemisphere and Palmyra Atoll and Rat Island in the north have demonstrated this is the current best practice and successful in restoring damaged ecosystems with minimal collated damage. Alternatives proposed by opponents like mice contraception are unproven and theoretical in concept, and would fail since they must be used in perpetuity, damaging the ecosystem in frequent (annual) disturbance, without a funding source. A one-time eradication using a few ounces amount of brodificaum will have little long-term marine effects (a major spill of hundreds of ounces in NZ waters persisted for a just over a year). World-class experts have reviewed and developed this program to suit the the local conditions and it is time to approve this project. Thank You.
Mark Rauzon - Geography Dept. Laney College, Oakland, CA. 94602

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 3, 2021 8:45:52 AM

From: Holly Jones <hjones@niu.edu>
Sent: Friday, December 3, 2021 4:45:39 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Hello,

As an expert in the impacts of invasive species eradication on seabirds and island ecology, I wanted to submit a comment in support of allowing the eradication of house mice on the Farallon Islands to move forward. I have studied the impacts of invasive mammals on island ecology, and the impacts of removing invasive mammals from islands on island ecology and seabirds for 20 years. In that time, I've measured and personally witnessed significant recoveries of native island species and whole-island ecological connections following mammal eradication. I worked on Anacapa Island's rat eradication project and published a study noting a 12-fold decrease in depredation rates of artificial Scripps' Murrelet nests following the removal of invasive rats. My global review on rat impacts on seabirds show just how vulnerable, especially burrow- and crevice-nesting small seabirds like the Ashy Storm-Petrel, Cassin's Auklet, and Rhinoceros Auklet on the Farralons are to invasive rodents. As a PhD student at Yale School of the Environment, I studied seabird-derived nutrient recovery on New Zealand islands and found that seabird-derived nutrient fluxes recovered within 15 years after invasive rats were removed and that active seabird restoration following eradication has the potential to speed recovery. More recently, I led a worldwide review of the impacts of invasive mammal eradication on fauna and found 596 populations of 236 native fauna benefitted from mammal eradication, including the rediscovery of species once thought extinct like the New Zealand storm-petrel. Each one of these studies underscores the importance of, and huge conservation impacts that removing invasive mammals has on island species and ecosystems. Indeed, removing invasive mammals from islands is one of the most effective conservation tools we have to combat the biodiversity crisis considering that most species that have gone extinct in the last 400 years are island species, and most of those extinctions were caused by invasive mammals.

Invasive mice are quickly emerging as one of the strongest threats to island fauna and ecosystems. Recently on many islands such as one I study Midway Atoll and others such as Gough and Marion Islands, invasive mice have been driving albatross numbers down and are threatening to extirpate other island seabirds. With the dual threat of at-sea fisheries by-catch and nesting colony predation, critically endangered seabirds are increasingly imperiled. Farallon seabirds and other native species are no exception to mouse impacts, as research has shown.

I understand and respect the concern about non-target and impacts to surrounding marine environments as a result of eradication projects. However, evidence indicates minimal non-target impacts from eradication projects globally, and indeed, significant rebounds of land-sea

linkages, and intertidal food webs following mammal eradication efforts. A study led by one of my graduate students showed that nearshore macroalgae communities are more diverse and more similar to never invaded island nearshore ecosystems following eradication of mammals. Other work in the tropics has shown rat eradication restores nutrient subsidies from seabirds to coral reefs, and studies in the Aleutians show community structure in the rocky intertidal is restored following rat eradication. Meanwhile, incidences of non-target impacts have been small, fleeting, and minuscule compared to the population-level and enduring benefits of such eradications for species and ecosystems both on islands themselves and in surrounding waters.

I'd urge you to consider that not acting to remove invasive mice is a choice - one that dooms the islands' fauna, and through the ecosystem-level impacts of its nesting seabirds, the islands' ecosystem functioning and surrounding nearshore ecosystems, to a terribly detrimental fate, and at worst extirpation or extinction. Removing mice from these islands is the obvious choice, and the best research we have shows the benefits will far outweigh the costs on this one - it's not even close.

Thank you for your time.

Respectfully,

Dr. Holly Jones

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~~~~~~
Holly Jones
Associate Professor
Evidence-based Restoration Lab
Northern Illinois University
Department of Biological Sciences
Institute for the Study of the Environment, Sustainability, and Energy
MO 436
Montgomery Hall
DeKalb, IL 60115
815 753 7527 - Office
331 588 7787 - Cell
Lead Editor, Ecological Solutions and Evidence
she/her/hers
~~~~~~
https://hjones82.wixsite.com/website
https://fieldsecrets.com/

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Friday, December 3, 2021 8:33:58 AM

From: Kathlene A. Henry-Gorman <khenrygo@calpoly.edu>
Sent: Friday, December 3, 2021 4:33:51 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Cc: Kathlene A. Henry-Gorman
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

December 3, 2021

Dear Coastal Commission,

I strongly supports efforts to recover endangered species for the good of our coastal environments. However, I cannot support the proposal by the US Fish and Wildlife Service to drop 1.3 tons of brodifacoum (a second generation anticoagulant rodenticide) by helicopter onto the Farallon Islands off the San Francisco coast. Their goal is to eradicate the invasive house mice that attract burrowing owls to the island each winter as they migrate south, but as the mouse populations drop, the owls can sometimes prey on the Ashy Storm-Petrel, an endangered seabird, that nests on these islands.

I object to these proposed poison drops because of the projected non-target mortality of other birds and animals from this powerful rodenticide, as well as this poison's potential to infiltrate terrestrial and aquatic food webs for many generations to come. I believe that all other promising solutions should be tried and exhausted before poison is used, including rodent fertility control, and trapping and relocating the small flock of burrowing owls that come to the island.

Please explore alternatives to this proposal that do not cause further harm to this valuable California environmental resource. Thank you for the opportunity to add my voice to this urgent conversation.

Sincerely,

Kathlene Henry-Gorman
2420 Ross Rd.
Cambria, CA 93428

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 3, 2021 3:27:01 AM

_____
From: JOHANNA SCHULTE-HILLEN <joschuhi@aol.com>
Sent: Friday, December 3, 2021 11:26:49 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Ladies and Gentlemen,

I lived in Los Angeles from 2000 to 2017. I currently reside in Germany, but I intend to move back to Los Angeles. I am not a U.S. citizen.

I strongly support efforts to recover endangered species. However, due to the projected non-target mortality of other birds and animals from the powerful rodenticide to be used in the effort to protect the ashy-storm petrel that nests on the Farallon Islands, as well as this poison's ability to infiltrate terrestrial and aquatic food webs for a long time, I strongly believe that all other promising solutions should be tried and exhausted before poison is used, including rodent fertility control as well as trapping and relocating the small flock of burrowing owls that come to the Farallon Islands.

Kind regards,

Johanna Schulte-Hillen

Sent from my iPhone

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Monday, December 6, 2021 7:17:38 AM

From: Georgia Brewer <georgiabrewer@gmail.com>
Sent: Monday, December 6, 2021 3:16:57 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

Dear Commissioners:

I'm writing to object in the strongest possible terms to the US Fish and Wildlife Service proposal to drop 1.3 tons of brodifacoum onto the Farallon Islands.

Time and again actions like this have led to unforeseen and unintended consequences. Issues with non-target mortality have been associated with similar shortsighted efforts in the past. In this case, we can actually predict consequences for the Ashy Storm-Petrel, an endangered species that nests on the island.

Just as important to consider is the potential infiltration of this poison into both terrestrial and aquatic food chains.

Then there's the inhumanity of using cruel anticoagulant rodenticides! Nothing about this proposal is acceptable.

Dropping over a ton of poison onto the island should be the VERY LAST RESORT, not the first! Will humanity never learn?

California can and should do better!

Thank you for your work.

Best,
Georgia Brewer
5518 Ventura Canyon Avenue
Sherman Oaks, CA 91401
818 909 7518

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Rodenticide
Date:	Thursday, December 2, 2021 7:42:08 PM

From: Constance Brown <brown.cf@gmail.com>
Sent: Friday, December 3, 2021 3:41:37 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Rodenticide

Please don't spread mouse poison around the Farallon Islands! With bird populations already declining drastically because of climate change and human activity, please, please don't hasten the deaths of the burrowing owls--and who knows what else! There's so much destruction already just because of human activity; don't deliberately destroy such a lovely bird.
Constance Brown

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Stop the Farallon Poison Drop
Date:	Monday, December 6, 2021 8:05:21 PM

From: Alexis Kahlow <alexiskahlow@gmail.com>
Sent: Tuesday, December 7, 2021 4:05:05 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>; Mr Kahlow <aaronpkahlow3@gmail.com>
Subject: Stop the Farallon Poison Drop

Please add this into the public comment or notes:

My family and I oppose dropping 1.5 tons of rodenticides on the Farallon Islands.

Sincerely,
Alexis

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Stop the poisoning of the Farallon island
Date: Monday, December 6, 2021 12:14:15 PM

From: sheila harmon <1sjharmon@gmail.com>
Sent: Monday, December 6, 2021 8:14:05 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: Stop the poisoning of the Farallon island

To whom it may Concern,
Please do not kill the rodents with toxic poison . Unfortunately when you poison the mice you also poison all the other animals who are in the food chain and eat the poisoned mice. Birds of prey will die and other animals that make the island a beautiful sanctuary for wildlife. It is heartbreaking to see animal populations dying due to indiscriminate use of rodenticides. I thank you in advance for doing the right thing for the animals and people who depend on the health of our planet.
Best,
Sheila Harmon
909 Westbend Rd
Westlake Village, CA.
91362

Sent from my iPad

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Stop the Proposed Farallon Islands Poison Drop
Date:	Tuesday, November 30, 2021 8:04:45 PM

From: Rita K <margarita.kovshun@gmail.com>
Sent: Wednesday, December 1, 2021 4:04:40 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Stop the Proposed Farallon Islands Poison Drop

Please do not conduct the poison drop!
It is impossible 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.

Sent from my iPhone

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: SUBJECT: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Saturday, December 4, 2021 11:46:36 AM

From: Barbara Gingrich Spiegel <bjg3s@mtmail.mtsu.edu>
Sent: Saturday, December 4, 2021 7:46:27 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal
Subject: SUBJECT: December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)

To All Concerned,

Please reconsider the dangerous use of brodifacoum to eradicate the mouse population of Farallon Island Wildlife Refuge. This highly toxic second-generation anticoagulant eventually enters the food chain of natural predators and also finds it way into the ocean as run-off endangering aquatic life.

This has shown to be extremely harmful to the environment and an irresponsible measure to control rodent populations. The release of owls or sterile feral cats would serve as a more effective and responsible remedy.

Those of us concerned about our coastal natural habitats trust that you'll enlist non-toxic alternatives for rodent remediation.

Thank you for your thoughtful consideration and reevaluation of this issue.

Barbara Spiegel
Thousand Oaks, CA

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: The Farallon Islands
Date:	Wednesday, December 1, 2021 10:02:35 AM

From: Darlene Elko <delko7777@gmail.com>
Sent: Wednesday, December 1, 2021 6:02:20 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: The Farallon Islands

Dear Coastal Commission:

Please stop poisoning the Farallon Islands. There must be a better way. It's time to update by taking the action to stop this poisoning starting in 2021.

Poison is NOT the answer since the whole food chain on the island, in the water and on the mainland will be affected regardless of the words that state it won't.

Protecting wildlife is required. As a concerned citizen I urge you to STOP using poison.

Darlene Elko
delko7777@gmail.com
11 Charlotte Dr #2
San Rafael, CA. 94901-4320

415-686-0392

From:	Jon Peddie
To:	Carl, Dan@Coastal
Cc:	Energy@Coastal; Bob Heil
Subject:	Hard to believe
Date:	Friday, November 26, 2021 2:18:33 PM

Hello Mr. Carl

It is astonishing to me to think that all the smart people and scientists that are involved with the coastal commissions can't seem to see the consequences of dumping poison on the Farallon islands as a means of rodent control.

Surely you and the members of the commission have considered these ramifications. As I'm sure you must know, Brodifacoum, is an outlawed a poison in California. To suppose that this poison will not spread in various ways to the endangered bird population and surrounding sea life ecosystem with a horrendous effect is incomprehensible. Beside the immediate effect of poisoning to death of bird and sea life, there is no doubt that it would continue up the food chain with even more widespread effect through both sea life and birds even unto the mainland. With so many dead and dying mice lying about , what would deter gulls, for instance, from such an available food source would be next to impossible and you know where the gulls go from there.

Who gets to make such arbitrary decisions without input from the public who will ultimately be negatively affected by this proposed action?

If they are elected positions, I can imagine they won't be re-elected. If they are appointed positions, then the elected person making such appointments must be called into question for his or her judgement.

Is there ANY appeal process? Is there ANYONE who will answer to these questions?

Respectfully

Jon Peddie

Chasing pixels, finding gems

Dr. Jon Peddie PE, President
Jon Peddie Research
publishers of Tech Watch and Graphics Speak
4 Saint Gabrielle Court
Tiburon, CA 94920-1619
+1 415.435.9368 – Office
+1 415.717.7703 - US Mobile

Jon@jonpeddie.com, Twitter @ Jonpeddie
www.jonpeddie.com www.gfxspeak.com

From:	James Cleaves
To:	Farallon Islands Consistency
Subject:	House mouse eradication
Date:	Saturday, December 4, 2021 4:51:44 PM

I support the house mouse eradication plan for the Farallon Islands as proposed by the U.S. Fish and Wildlife Service. This plan would have the fewest overall environmental impacts and the best chance for permanent eradication of the house mice of any plan being considered.

Thank you for your attention.

Sincerely, James Cleaves

From:	Cliff Bixler
To:	Farallon Islands Consistency
Subject:	House mouse erradication
Date:	Monday, December 6, 2021 5:14:54 PM

Dear Commissioners:
We support the program to eradicate non-native mice from the Farralon Islands to protect the remaining AsheyStorm Petraeus that nest there..
Cliff & Lise Bixler
Santa Cruz, CA

From: gourp@everyactioncustom.com on behalf of Don Thompson
To: Farallon Islands Consistency
Subject: I approve the use rodenticides in the Farallon Islands in California
Date: Wednesday, December 1, 2021 6:54:28 PM

Dear Farallon Islands,

I request that you approve the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife.

It poses a minimal secondary poisoning risk to predators. Aerial application of brodifacoum places an acceptable risk for the mammalian and avian wildlife on the Farallon Islands. Those who oppose this application are fundamentally ignorant of toxicology and easily swayed by extrme environmental activists.

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and need to be exterminated.

Please approve a the proposed aerial dispersal of the rodenticide brodifacoum on the Farallon Islands. Do not require a Supplemental Environmental Impact Statement (SEIS), thes is a waste of time and money.

Thank you for considering this request.

Sincerely,
Don Thompson
3308 S Bentley Ave Los Angeles, CA 90034-5210
gourp@hotmail.com

From:	Richard Hamstra
To:	Farallon Islands Consistency
Subject:	Let"s get this mess corrected
Date:	Wednesday, December 1, 2021 6:44:01 PM

The islands have been abused since before the gold rush through today by humankind. It is now time for humankind to start to correct some of the problems we the people have brought to this bit of the Pacific.

Richard Hamstra
Marin County, Ca

From: Jeffrey Blackman
To: Energy@Coastal
Date: Wednesday, November 24, 2021 1:36:53 PM

I oppose the poison drop.

What a cruel, heartless endeavor to propose.

Such poisons should not be allowed on these islands.

Sincerely, Jeffrey Blackman

--
Jeffrey Blackman
Jeffrey Blackman, Ltd.
Post Office Box 41624
Tucson, Arizona 85717
Telephone: 520-882-2662
Facsimile: 520-622-0049
JBlaw33@gmail.com
JBattorney.com

From:	Gerald Meral
To:	Farallon Islands Consistency
Subject:	mice at the Farallones
Date:	Tuesday, December 7, 2021 9:58:25 AM

Dear Coastal Commission

The Natural Heritage Institute supports the Fish and Wildlife Service proposal to use a rodenticide to eliminate mice from the Farallon Islands. This is the only way to get rid of the mice, and it is vital for seabird conservation. This is proven conservation science and technology, and must be used to protect our seabirds. Please approve this USFWS proposal. Thanks for considering this message.

-- Jerry Meral, Ph.D.

Director
California Water Program
Natural Heritage Institute

jerrymeral@gmail.com
415-717-8412
--
Jerry Meral

jerrymeral@gmail.com
415-717-8412

From: Evan Jane Kriss
To: Farallon Islands Consistency
Subject: Mice Eradication on the Farallons
Date: Sunday, December 5, 2021 1:06:40 PM

- The US Fish and Wildlife Service's Mouse Eradication Plan is critically needed to restore the ecosystem of the Farallon Islands by fully eradicating introduced and highly destructive house mice whose presence has already caused the decline of native seabirds. Of utmost concern is the Ashy Storm-Petrel* whose numbers have plummeted by 49% in just 12 years. Impacts on Leach's Storm-Petrels, endemic salamanders, camel crickets, and endemic Farallon daisies will also be removed.
- The Service's plan is to drop and hand-place Brodifacoum 25D-Conservation, a rodenticide developed and EPA-labeled specifically for use in restoring island habitats. Past eradications have zero to low mortality of non-target species, and the overwhelming result has been complete removal of rodents and rebounding of at-risk native species.
- Brodifacoum-25D Conservation was specifically exempted from restrictions of State Assembly Bill AB-1788 due to its importance in restoring habitats. It was used to successfully eradicate rats from Anacapa Island in California's Channel Islands, where habitats are similar to the Farallon Islands.
- Use on the Farallones by licensed professionals is completely different from the unregulated and indiscriminate use on the mainland.
- Marine mammals such as sea lions and seals feed at sea and their diet is squid and fish, not grain pellets.
- This timing of the Plan's implementation (fall/early winter) would be when most seabirds have left the islands to feed at sea, not returning until spring to nest.
- Hazing methods that have been tested and found effective would be used to frighten gulls off the islands, such as lasers, spotlights, pyrotechnics, biosonics, predator calls, air cannons, effigies, and kites.
- Most mice will retreat to their burrows to die. Any mice remaining above ground will be collected.
- If another less toxic, effective, permanent removal method were in existence, it would have been implemented already.
- Contraceptive methods would not work because they are not designed for full

eradication, just control; and are not yet available. Their use would require repeated replenishment, also by helicopter, to reach steep and inaccessible areas. This would result in ongoing disturbance of sensitive species within the wildlife refuge.

- Pellets that may enter surrounding waters are highly soluble, will drop to the ocean floor, and the Brodifacoum would dilute quickly. Studies on other islands show that Brodifacoum binds to the sea bottom and becomes unavailable.

Please follow the science and adopt this method to eradicate mice on the Farallons.

Evan Jane Kriss

26 Cloud View Road

Sausalito CA 94965

Sent from my iPhone

From: Dennis Riphenburg
To: Farallon Islands Consistency
Subject: Mouse eradication
Date: Monday, December 6, 2021 4:23:03 PM

I am writing you to voice strong support for eradicating the house mouse population at the Farallons. The native population, both terrestrial and pelagic desperately need all the help we can provide to perpetuate their species. The wonderful thing about the natural world is that is is so resilient when given a chance. I'm not sure how you're planning on removing the mice but in the long run I am sure it will work. Sadly many species at the Farallons don't have the luxury of time for the long run. You have my support and I look forward to hearing the results of your important venture!!

Dennis Riphenburg
P O Box 212
San Juan Bautista, CA 95045

From: Don Roberson
To: Farallon Islands Consistency
Subject: Mouse eradication of the Farallones
Date: Monday, December 6, 2021 3:44:51 PM

To whom it may concern:

Whatever gains that have been made in saving endangered seabirds around the world, most of it has required the eradication of a non-native, introduced predator or pest. Half the world's Ashy Storm-Petrels breed on the Farallones, but this population is threatened with serious declines and potential extinction due to the presence of non-native house mice there. I strongly support saving native seabirds everywhere from declines and extinctions, and therefore strongly support the eradication of the non-native house mice on the Farallones.

Thank you,

Don Roberson
Author "Monterey Birds," "Rare Birds of the West Coast", "Breeding Bird Atlas of Monterey County," and multiple papers on seabird distribution and identification
282 Grove Acre Ave.
Pacific Grove CA 93950

From: Judith Klein
To: Farallon Islands Consistency
Subject: Mouse eradication on the Farallones
Date: Friday, December 3, 2021 9:39:11 AM

- Good morning,

  I am writing to you as a Marin County resident, a scientist, and a lover of the natural world.

  The US Fish and Wildlife Service's Mouse Eradication Plan is critically needed to restore the ecosystem of the Farallon Islands by fully eradicating introduced and highly destructive house mice whose presence has already caused the decline of native seabirds. Of utmost concern is the Ashy Storm-Petrel* whose numbers have plummeted by 49% in just 12 years. Impacts on Leach's Storm-Petrels, endemic salamanders, camel crickets, and endemic Farallon daisies will also be removed. The Service's plan is to drop and hand-place Brodifacoum 25D-Conservation, a rodenticide developed and EPA-labeled specifically for use in restoring island habitats. Past eradications have zero to low mortality of non-target species, and the overwhelming result has been complete removal of rodents and rebounding of at-risk native species. Brodifacoum-25D Conservation was specifically exempted from restrictions of State Assembly Bill AB-1788 due to its importance in restoring habitats. It was used to successfully eradicate rats from Anacapa Island in California's Channel Islands, where habitats are similar to the Farallon Islands. Use on the Farallones by licensed professionals is completely different from the unregulated and indiscriminate use on the mainland. Marine mammals such as sea lions and seals feed at sea and their diet is squid and fish, not grain pellets so they should not be at risk with these rodenticides. In addition, the timing of the Plan's implementation (fall/early winter) would be when most seabirds have left the islands to feed at sea, not returning until spring to nest. Hazing methods that have been tested and found effective would be used to frighten gulls off the islands, such as lasers, spotlights, pyrotechnics, biosonics, predator calls, air cannons, effigies, and kites. Most mice will retreat to their burrows to die. Any mice remaining above ground will be collected. If another less toxic, effective, permanent removal method were in existence, it would have been implemented already. Contraceptive methods would not work because they are not designed for full eradication, just control; and are not yet available. Their use would require repeated replenishment, also by helicopter, to reach steep and inaccessible areas. This would result in ongoing disturbance of sensitive species within the wildlife refuge. Pellets that may enter surrounding waters are highly soluble, will drop to the ocean floor, and the Brodifacoum would dilute quickly. Studies on other

islands show that Brodifacoum binds to the sea bottom and becomes unavailable.

Please implement the USFWS Mouse Eradication Plan to preserve the remarkable ecosystem of the Farallones Islands.

Thank you.
Judith Klein, MD
Assistant Professor of Emergency Medicine, UCSF-ZSFG
223 E Strawberry Drive
Mill Valley, CA 94941

From:	smckee57@everyactioncustom.com on behalf of Sarah McKee
To:	Farallon Islands Consistency
Subject:	Nix Poisoning California"s Farallon Islands!
Date:	Monday, November 29, 2021 8:05:57 AM

Dear Farallon Islands,

I urgently request that you deny the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge.

Right now I have a house mouse problem myself. But I refuse to use poison. You should, as well.

Globally significant wildlife populations inhabit the Farallones. These include 13 seabird species that nest on the islands; pinnipeds including Northern fur seals, Steller sea lions, CA sea lions, harbor seals, and northern elephant seals; and endemic species including white sharks, hoary bats, and arboreal salamanders.

Brodifacoum is a “second generation anticoagulant rodenticide” (SGAR) that is highly toxic to birds, mammals, and fish. It's a cruel way to kill.

It also poses a secondary poisoning risk to predators. The California Department of Pesticide Regulation quotes the FWS: “Secondary exposure to SGARs is particularly problematic due to the high toxicity of the compounds and their long persistence in body tissues. For example, brodifacoum, a common SGAR, is persistent in tissue, bioaccumulates, and appears to impair reproduction.

Even where the proximate cause of death has been identified as automobile strike, predation, or disease, toxicologists and pathologists have attained sufficient toxicological evidence to conclude that rodenticide-induced blood loss increased animal vulnerability to the proximate cause of death.”

This threat of secondary poisoning has led the state to ban almost all uses of brodifacoum. Although this particular use is an exception, its risks are extremely high.

Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean. There is no way to limit the impact to the targeted house mouse.

As important as native ecosystems are, poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions.

Please deny a finding of consistency of the proposed aerial dispersal of the highly toxic rodenticide brodifacoum on the Farallon Islands.

Require that a Supplemental Environmental Impact Statement (SEIS) be conducted by an independent body examining alternatives, including the no action alternative and nontoxic integrated control methods.

There have to be better ways. For instance, the SEIS should investigate the possibility of controlling the mice through controlled intensified predation by providing nesting boxes for barn owls and/or kestrels.

Sincerely,
Sarah McKee
9 Chadwick Ct Amherst, MA 01002-2825
smckee57@earthlink.net

From:	Kelly Chien
To:	Energy@Coastal; Farallon Islands Consistency
Subject:	No Drop - Stop the poison
Date:	Saturday, December 4, 2021 12:21:51 PM

Hi,

I am opposed to the poison drop at the Farallones. This will bring so much harm to the entire ecosystem and surrounding water, animals and environment. Please refrain from proceeding with this plan.

Thank you for your consideration.

Best,
Kelly

From:	prpma@aol.com
To:	Farallon Islands Consistency
Subject:	No Drop
Date:	Tuesday, December 7, 2021 9:02:07 PM

Hello,

I just read an article saying that you will soon be voting on whether or not to allow the US Fish and Wildlife Service to drop 1.5 tons of very toxic poison rodenticide. This is supposedly targeted to kill the rat population there. Well, there are many terrible, insane ideas running around these days, but this has to be one of the worst! I mean, this is an ocean... you can't just assume "only" rats will run and eat this poison. By its own admission, the Wildlife Service itself knows that there will be other species killed and specifically mentions the continued decimation of the western seagull following this drop.

I ask you to deny this permit to drop this poison into our ocean, and have them look at alternative means, one of which is population control by biological contraception which has been used successfully. I urge you to suggest safer alternatives such as this.

Thank you,
Rosemary Rasori

From:	Ronni Sands
To:	Farallon Islands Consistency
Subject:	No Drop
Date:	Thursday, December 2, 2021 5:19:39 PM

I want to speak about the poison proposal.
Please Stop The Drop!!! Our waters are sacred. There is too great a risk to land, water and animals in this proposed release of Poison. You must find a way that takes all of nature into consideration.
The poison will harm the innocent and not solve the problem.
Stop the Drop!
Ronni Sands

From: feather@mcn.org
To: Farallon Islands Consistency
Subject: No Drop
Date: Wednesday, December 8, 2021 2:36:36 PM

Please don't drop this deadly poison on the Farallones. There has to be a better way! Perhaps trapping the Burrowing Owls and releasing them on the mainland and then setting traps with bait to catch the mice and kill them inside the traps? There really has to be a better way than dropping poison.

Sincerely

Lisa D Walker-Roseman
Fort Bragg, California

From:	headwtrs@sonic.net
To:	Farallon Islands Consistency
Subject:	NO DROP; NO POISON DROP at all
Date:	Sunday, November 28, 2021 12:12:28 PM

California Coastal Commission:
NO POISON DROP
We, the people of Coastal California, insist that the USF&W Service plan to drop rodenticide poison bait on Southeast Farallon Island be abandoned permanently. This ill-conceived plan is not the solution to help the Ashy Storm Petrel. The SGAR compound is well known to have secondary and beyond devastating impacts on wildlife.
Please enter this comment into the record at the Dec. 16 CCC meeting on this subject.

Thank you,
A Goodwin, (707) 938-2393
Sonoma County
No mailing list please, as always respecting residents' privacy while hearing our great concerns.

From:	Teri Shore
To:	Farallon Islands Consistency
Subject:	Not available Re: December 2021 California Coastal Commission hearing notice on U.S. Fish & Wildlife Service Consistency Determination CD-0006-21
Date:	Friday, December 3, 2021 10:15:39 AM

Hello, My last day at Greenbelt Alliance is Wednesday, May 26. For Greenbelt Alliance business of any kind, please contact Sarah Cardona at scardona@greenbelt.org or call the main office and leave a voicemail at (415) 543-6771 ext 301

If you need to reach me personally my email is terishore@gmail.com

--

Teri Shore
Advocacy Director

My official last day at Greenbelt Alliance is May 26, 2021.

Greenbelt Alliance
1 (707) 934-7081 cell | tshore@greenbelt.org
greenbelt.org | Facebook | Instagram | Twitter

From:	Alexander Gaguine
To:	Farallon Islands Consistency
Subject:	Please support mouse eradication project
Date:	Monday, December 6, 2021 5:53:50 PM

Dear Commission

Please support mouse eradication on Southeast Farallon. It's hard to imagine a downside of the project. Save the nesting birds!

Thanks.

Alexander Gaguine
221 Laguna St.
Santa Cruz CA 95060

From:	Jackie Turner
To:	Energy@Coastal
Subject:	poison drop on Farallon Islands
Date:	Thursday, November 25, 2021 2:45:02 PM

Research has shown time and time again that poisoning never ends with the target species. Predators eat easy-to-catch, dying prey and the poison travels up the food chain.
Poison will also end up in the ocean killing marine species.
I strongly urge you not to allow a poison drop on the beautiful Farallon Islands.

Jackie Turner
Wildlife Rehabilitator

"No matter how few possessions you own or how little money you have, loving wildlife and nature will make you rich beyond measure."
— Paul Oxton

From: Lois Epstein
To: Energy@Coastal
Subject: Poisoning the islands off the California coast.
Date: Thursday, November 25, 2021 4:37:00 AM

Please do not use this kind of poison to kill anything. The poison not only kills mice but kills the animals that eat them. It was heartbreaking to watch some eagle chicks suffering while bleeding out from this poison that came from prey their parents brought into the nest that had been poisoned this way. This will happen to other birds including the eagles and rapters we are trying to save and improve numbers. These islands are a wildlife refuge and marine refuge which means just that - a safe place to live. And what about the fish ? Don't people eat this too? A person could die from eating anything that was poisoned. I love wildlife and sea mammals and fish and birds. This is supposed to be a safe place. Please do not poison
them. There are other ways to catch mice. Get live traps. Then you can transfer the mice to larger containers and humanely get rid of them without harming other non target species. And another thing- anything poisoned that is not a target can go other places and spread the poison. There could be a massive bird or fish or other species die off. Poisons almost killed off the entire eagle species as well as other raptors. Nothing is worse than killing species that need to live and be saved. Using live traps would also allow you to remove smaller non target species and save them. Please, I urge you to keep our birds and fish and other mammals safe and not kill them or make them suffer. Be kind! God will thank you. so will millions of others including the animals and birds..

Sent from my iPhone

From: Soraya Dosaj
To: Energy@Coastal
Subject: Proposed Farallon Islands Poison Drop
Date: Thursday, November 25, 2021 6:37:39 AM

I am opposed to the proposed poison drop. Please consider other methods of reducing the rodent population that do not have such far-reaching negative effects up the food chain.

- Soraya Dosaj
6220 Allott Ave.
Van Nuys, CA 91401

From:	SUSAN REPP
To:	Energy@Coastal
Subject:	Proposed poison drop, S. Farallon islands...
Date:	Friday, November 26, 2021 5:13:33 AM

As a citizen concerned about our continued attack on the environment here around the world and here in the U.S. I respectfully urge you to deny the proposed poison drop on the south Farallon islands. Carpet bombing a whole area as you already know not only destroys the target animal but others along the animal chain and the environment in which it lands. There is no way to avoid these disastrous effects with such widespread impunity, what an environmental disaster!

I strongly appose this drop and ask that you deny the mouse eradication project.

Thank you for your time in this very important decision.

Sincerely,

Susan C. Repp

From:	Liz Rubin
To:	Farallon Islands Consistency
Subject:	Re: December 2021 California Coastal Commission hearing notice on U.S. Fish & Wildlife Service Consistency Determination CD-0006-21
Date:	Friday, December 3, 2021 10:19:17 AM

Awesome

On Fri, Dec 3, 2021 at 1:15 PM Farallon Islands Consistency <farallonislands@coastal.ca.gov> wrote:

> Please see attached for official hearing notice.
>
> *Energy, Ocean Resources, and Federal Consistency*
>
> 455 Market Street, Suite 300
>
> San Francisco, California 94105
>
> farallonislands@coastal.ca.gov
>
> CALIFORNIA COASTAL COMMISSION

--
Peace,

Liz Rubin
Founder
Ecodeo
213 840 2786
liz@ecodeo.co

Sent from mobile phone Please excuse any typos and brevity :)

From:	Jeff Manker
To:	Farallon Islands Consistency
Subject:	Re: Mouse eradication On Southeast Farallon
Date:	Monday, December 6, 2021 8:08:28 PM

To Whom It May Concern,

I wish to convey my whole-hearted support for the plan to eradicate the House Mouse from Southeast Farallon Island. This one tiny creature, with no predator on the island is wreaking havoc with the Ashy Storm Petrel. Please grant approval to the project to remove them.

I worked as a guide in Antarctica on two separate occasions, two years apart. When I visited South Georgia Island the first time they were just beginning the rat eradication program. I am an avid birder and saw no evidence of two species that were endangered there. Two years later, it was a different story. I had numerous sightings, in multiple locations, of the South Georgia Pipit and the Yellow-billed Pintail. These birds had a death sentence and the eradication of rats gave them a reprieve.

I hope you will do the same, using a proven method for the Ashy Storm Petrel.

Thank you,

Jeff Manker
Retired Ornithology Teacher
Advisory Board Member K-12 Education: Cornell Lab of Ornithology
Advisory Board Member the Bird School Project
Board President Monterey Bay Birding Festival

From:	Jon Peddie
To:	"William Beech"; Energy@Coastal
Cc:	"Ellyn Weisel"; "Alison Hermance"; "candaceclemmer@yahoo. com"; "com"
Subject:	RE: Poison drop
Date:	Friday, November 26, 2021 8:06:07 AM

Tell me/us who we should contact. Give me an email address

Chasing pixels, finding gems

-

+1 415.435.9368 – Office

From: William Beech <Bill@BeechSF.com>
Sent: Thursday, November 25, 2021 11:35 AM
To: EORFC@coastal.ca.gov
Cc: Ellyn Weisel <wildcare@discoverwildcare.org>; Alison Hermance <alisonhermance@discoverwildcare.org>; candaceclemmer@yahoo. com (candaceclemmer@yahoo.com) <candaceclemmer@yahoo.com>; JON@JONPEDDIE. COM (JON@JONPEDDIE.COM) <JON@JONPEDDIE.COM>; com (Ibeechman@me.com) <Ibeechman@me.com>
Subject: Poison drop

It is practically beyond belief that 2 responsible agencies (CA coastal commission) and (USFWS) plus a a bird advocacy group , all that should recognize the dangerous repercussions, should support the proposed massive drop of a poison, brodifacoum, a poison outlawed for use in California, on the Farallon Islands. To suppose that this poison will not spread in various ways to the endangered bird population and surrounding sea life ecosystem with a horrendous effect is idiotic to say the least. Beside the immediate effect of poisoning to death of both bird and sea life, there is no doubt that it would continue up the food chain with even more widespread effect through both sea life and birds even unto the mainland. With so many dead and dying mice lying about , to deter gulls, for instance, from such an available food source would be next to impossible and we know where the gulls go from there.
If over the course of the last 10 years of arguing, a comprehensive IPM rodent reduction and removal strategy had been implemented the Southeast Farallon Island would have significantly fewer mice but I suspect manufacturer interference.
If this matter were submitted for vote to even just the general population of San Francisco County, which the Farallons are part of, I am confident that it would be defeated.
I respectfully submit that you must drop this proposal for a more sane solution.
William R Beech
bill@beechsf.com
Tiburon

BB

From:	MARY FITZPATRICK
To:	Farallon Islands Consistency
Subject:	Restoration of the Farallones Ecosystem
Date:	Sunday, December 5, 2021 5:29:29 AM

I ask the California Coastal Commission to approve the US Fish and Wildlife Service eradication plan for introduced house mice on the Farallon Islands at its December hearing.

The eradication plan is consistent with the Coastal Zone Management Program because it will restore the ecosystem of the Farallones.

This well-tested plan has a proven record and will be carefully executed in the interest of native wildlife. The plan's one-time controlled use rodenticide has been approved by the EPA and the state of California for conservation purposes. It has effectively removed rodents on over 600 islands worldwide, including one of California's Channel Islands. The plan entails careful timing, hazing to disperse roosting birds, and removal of carcasses to prevent secondary mortality.

Please approve the US Fish and Wildlife Service eradication plan at your next hearing in the interest of saving the ecosystem of the Farallon Islands.

Sincerely,
Mary Fitzpatrick
San Rafael

From:	Kathleen Jackson
To:	Farallon Islands Consistency
Subject:	restoration
Date:	Wednesday, December 1, 2021 6:00:05 PM

Thank you for considering restoration of the ecosystem on the Farallon Islands. It is essential for the flora and fauna that is there

The US Fish and Wildlife Service's Mouse Eradication Plan is critically needed to restore the ecosystem of the Farallon Islands by fully eradicating introduced and highly destructive house mice whose presence has already caused the decline of native seabirds. Of utmost concern is the Ashy Storm-Petrel* whose numbers have plummeted by 49% in just 12 years. Impacts on Leach's Storm-Petrels, endemic salamanders, camel crickets, and endemic Farallon daisies will also be removed.

Please follow through on the US Fish and Wildlife Service's Mouse Eradication Plan.

Sincerely
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:	Burk Braun
To:	Farallon Islands Consistency
Subject:	rodent eradication project
Date:	Wednesday, December 1, 2021 6:02:47 PM

To: California Coastal Commission

My wife and I both support the mouse eradication project planned for the Farallon Islands. We must do what we can to restore key ecosystems and return them to a state supportive to wildlife that has used these islands for millennia, before our introduction of invasive species like mice. We are members of Marin Audubon, the national Audubon society, the Sierra Club, which all support this project.

Sincerely, Leslie Stewart and Burk Braun

--

Burk Braun
37 Hillcrest Drive
San Rafael, CA 94901
415-459-4978

From: Richard Schechter
To: Farallon Islands Consistency
Subject: rodenticide drop
Date: Sunday, November 28, 2021 8:47:58 AM

I am against the rodenticide drop on south farallon island. NO DROP some form of biological approach must be available coyotes? brought in and removed. some other non petrel predator? richard schechter sebastopol

From: Marilyn Evenson
To: Energy@Coastal
Subject: South Farallon Invasive House Mouse Eradication program
Date: Sunday, November 28, 2021 3:10:19 PM

The USFWS for the "South Farallon Islands Invasive House Mouse Eradication Program" intends to drop the toxic poison brodifacoum to kill the rodents on the beautiful & wild Farallon Islands off California. It is also a National Wildlife Refuge. I am asking the California Coastal Commission to NOT allow this deadly poison to be used. It was outlawed by Governor Newsome in 2020. It not only kills the mice but other animals up the food chain that ingest the poisoned rodents. Some are endangered species & non-targeted animals. Brodifacoum will poison the surrounding land & water and ruin the ecosystem. Besides, it never eradicates all the rodents & they just produce more.
Please, as you meet December 16th, consider the unintended consequences of this lethal poison. Keep these islands free of poisons & deny this project. It would be a disaster. Whenever man interferes with Mother Nature, it is usually not a good outcome.
Thank you & a reply would be appreciated at: mevenson311@gmail.com
Marilyn Evenson
Norwalk, OH
A frequent California visitor

From: Tahera Mamdani
To: Energy@Coastal
Subject: Stop The Farallon Islands Poison Drop
Date: Saturday, November 27, 2021 10:18:01 AM

Dear commissioner;

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.

The Project (quoting the Environmental Impact Statement from the United States Fish & Wildlife Service (USFWS) "expects that eradicating invasive mice will benefit native seabirds, amphibians, terrestrial invertebrates, plants, and wilderness quality, and will help restore natural ecosystem processes on the islands."

The Farallon Islands are an incredibly sensitive environment. Anything that happens on any of them will affect everything on the island(s) and in/throughout nearby waters. These islands are also not far from San Francisco, Marin and Sonoma Counties, which means that animals that come into contact with the poisoned bait on the islands will sicken or die on the mainland, exposing more wildlife to the risks of secondary poisoning.

Brodifacoum is toxic to birds, mammals and aquatic life (this is according to the product label,) and is an extremely dangerous and persistent environmental poison.

Brodifacoum persists in the soil for 120+ days, and it can persist in the livers of exposed animals for over 200 days (more than eight months!)

In fact, the California EPA has banned the sale of rodenticides containing brodifacoum to consumers because of its toxicity and the dangers to non-target wildlife. Registration for these toxic poisons has also been cancelled on the federal level.

Proponents of the USFWS plan insist that island conservation is different, and that poison should be allowed in this situation because it is unique.

Everyone thinks their poison situation is unique! People think "it's just my backyard." "It's just my neighborhood park." But what they don't realize is that every other person has come to the same conclusion, and that means these dangerous and deadly poisons are everywhere in our environment.

In this case, officials are thinking "It's just the Farallon Islands," but this is a terrible precedent to set in the San Francisco Bay Area. Poison is the easy way out, but the easy way is not always the best way. A sustained rodent control campaign on the islands would help threatened seabirds, reduce the impacts of the mice on native vegetation and endemic wildlife and eventually rid the island of the mouse problem. But it wouldn't be easy. Solving nuisance wildlife problems the environmentally responsible way rarely are.

Non-target predator animals will consume the rodents that have eaten the pellets and be poisoned too.

The document “Rat Island Rat Eradication Project: A Critical Evaluation of Nontarget Mortality” outlines the unintended consequences of this type of eradication project. Quoting from the document:
“Some nontarget mortality was expected, but the actual mortality exceeded the predicted mortality. Forty six Bald Eagles died (exceeding the known population of 22 Bald Eagles on the island); toxicological analysis revealed lethal levels of brodifacoum in 12 of the sixteen carcasses tested.”

Over the past decade, WildCare has tested hundreds predatory patients in our Wildlife Hospital for exposure to rodenticides from having eaten poisoned rodents. A shocking 76% of tested patients test positive, and many of these patients died from their exposure. Our research demonstrates conclusively that non-target animals can and do die from eating rodents that have eaten poison. These toxins are persistent in the environment and deadly; they should not be used in massive quantities in national wildlife refuges.

Non-target species will consume the pellets. The document about the Rat Island project, “Critical Evaluation of Nontarget Mortality,” further demonstrates that, while most poisoning of non-target animals resulted from predation upon bait-poisoned rodents, gulls and other animals were found to have also consumed the pellets and to have died from primary poisoning from brodifacoum.

The above warnings are clear, many animals each year die from pesticide poisoning.

Please take heed of the past experiences and stop this unnecessary and environmental catastrophe.

Sincerely

Tahera and Abdulla Mamdani
Fridley MN 55432

Sent from my iPhone

From:	Chris Swarth
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Monday, November 29, 2021 2:58:30 PM

Dear Coastal Commissioners:

I'm writing to encourage you to support the plan to permanently remove House Mice from the Farallon Island National Wildlife Refuge and to approve the consistency determination for the U.S. Fish and Wildlife Service's plan. House mice have caused significant disturbance to the islands' ecosystem and seabirds.

The only way the island can recover is to remove all the house mice. The survival of even a single pair of mice jeopardizes the entire project, as the House Mouse reproductive rate is very high.

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,

Chris Swarth
Former Director, UC Merced Vernal Pools and Grassland Research Reserve (2013-2016)
Former PRBO Farallon Biologist (1982-1984)
Former USFWS Biologist, Don Edwards San Francisco Bay NWR (1979-1981)

From:	william G. Hoppes
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Monday, November 29, 2021 10:47:49 AM

Dear Commissioners,

I am writing on behalf of the Ohlone Audubon Society to request that you 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 cannot believe how long this issue has dragged on when a solution has been proposed for decades that has proven effective in at least 700 other island situations.

The only feasible and effective way to protect the Farallon Island ecosystem is the complete eradication of the introduced house mouse. The only method that has proven effective in such as cases is the USFWS preferred alternative, the aerial broadcast of the rodenticide Brodifacoum.

Other alternatives proposed will not get the job done and their pursuit has only delayed by years an effective solution to this problem

Please stick to the best science and approve the USFWS approach as outlined in the 2019 final EIS.

Sincerely,
William G. Hoppes, President
Ohlone Audubon Society

From:	Joseph Morlan
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Sunday, November 28, 2021 9:35:57 PM

Dear Commissioners,

The amount of poison to be used has been deliberately and greatly exaggerated by opponents. The poison is diluted and distributed with bait such that the rodents will eat enough of it to feel sick. It will not kill them outright, but make them feel sick enough to repair to their tunnels where they will die underground. This technique, pioneered in New Zealand has been adopted on island ecosystems around with world.

When I visited New Zealand a few years ago we were privileged to visit a number of islands where rats and other predators had been eradicated. What a huge difference to have the opportunity to see so many critically endangered species that would have disappeared long ago if it were not for control of invasive rodents on islands.

A similar technique was used on South Georgia Island where the endemic South Georgia Pipit was nearly wiped out by invasive rats brought in by old whaling ships. A few pipits survived on nearby islets, and when the rats were eliminated the pipits immediately recolonized the main island where we were able to see many of them at close range. This would never have been possible without the successful eradication of rats. This was a project that took several years and remains a monument to the dedication of conservationists.

Currently the same technique is in place on Gough Island sponsored and funded by RSPB. I had the privilege to visit Gough Island a few years ago where the last remaining Tristan Albatross breed. Problem is they breed in the winter when most of the other seabirds are gone, and when the adults are away on their long excursions to find food for their young, the mice literally eat the chicks alive on their nests. Just a terrible thing to even think about, but I've seen video and it happens every year.

Another project currently getting under way is to eradicate mice on Marion Island, a place I was scheduled to visit next month but I had to cancel. That project is supported by Birdlife International.

A very good organization which I support is Island Conservation headquartered in Santa Cruz. They are devoted to eliminating rodents and predators from island ecosystems throughout the world. They also fully support the proposed Farallon Island project.

All of these projects used dilute solutions of rodenticide and bait to great effect. There simply is no alternative to eliminate these pests. As humans, for better or worse, we were the vectors that caused this problem and I believe we have a moral duty to reverse it.

The scare tactics used by opponents is overblown and unworthy in my opinion. When I visited the Farallons many years ago, mice were already present in the house and living quarters and were being trapped individually. Now, not too surprisingly, they are totally out of hand.

From: Richard Reed
To: Farallon Islands Consistency
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Friday, November 26, 2021 5:05:30 PM

Dear Commissioners,

Please 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 "preferred alternative" aerial broadcast of the rodenticide Brodifacoum) identified in the Final EIS published in March 2019.

I fully trust the USFWS and scientists who've been working on the islands for half a century in this matter, and hope you will too.

Thank you!

Sincerely,
RIchard Reed, Davis, CA

From:	Megan Jankowski
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Friday, November 26, 2021 9:50:10 AM

Dear Commissioners,

I'm writing to reiterate my support for the US Fish & Wildlife Service's Farallon Islands Mouse Eradication Plan. I've known several people who have worked on the island. One described the invasive house mice problem as "at plague levels". This is not a healthy and functioning ecosystem, and the vulnerable breeding birds have been shown to be at tremendous risk.

I have also worked and volunteered in wildlife hospitals and seen the effects of secondary rodenticide poisoning. I think we can all agree that rodenticide is not something to use lightly, but in this case the benefits outweigh the risks. This plan has been years in the making with the best available science, and I'm convinced of its necessity.

Please approve the upcoming request for a consistency determination for this project.

Megan Jankowski
Oakland

From:	Gregor, Eugene C.
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Thursday, November 25, 2021 12:44:50 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 house mice.

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

Best regards.

ECG

From: jeanineis
To: Farallon Islands Consistency
Subject: The US Fish and Wildlife Service's Mouse Eradication Plan
Date: Thursday, December 2, 2021 7:57:16 AM

- Dear Sirs and madams; As a concerned citizen and lover of the Farallon Islands, I have watched over the years with increasing concern to the decline of the wonderful seabirds that nest and inhabit this important resource. I have attached the scientific evidence that explains how important it is to take the dramatic step of total eradication of the mice on the islands. Please approve this plan.

  Thank you

  Jeanine Starritt

  Novato, CA

  The US Fish and Wildlife Service's Mouse Eradication Plan is critically needed to restore the ecosystem of the Farallon Islands by fully eradicating introduced and highly destructive house mice whose presence has already caused the decline of native seabirds. Of utmost concern is the Ashy Storm-Petrel* whose numbers have plummeted by 49% in just 12 years. Impacts on Leach's Storm-Petrels, endemic salamanders, camel crickets, and endemic Farallon daisies will also be removed.

- The Service's plan is to drop and hand-place Brodifacoum 25D-Conservation, a rodenticide developed and EPA-labeled specifically for use in restoring island habitats. Past eradications have zero to low mortality of non-target species, and the overwhelming result has been complete removal of rodents and rebounding of at-risk native species.
- Brodifacoum-25D Conservation was specifically exempted from restrictions of State Assembly Bill AB-1788 due to its importance in restoring habitats. It was used to successfully eradicate rats from Anacapa Island in California's Channel Islands, where habitats are similar to the Farallon Islands.
- Use on the Farallones by licensed professionals is completely different from the unregulated and indiscriminate use on the mainland.
- Marine mammals such as sea lions and seals feed at sea and their diet is squid and fish, not grain pellets.

- This timing of the Plan's implementation (fall/early winter) would be when most seabirds have left the islands to feed at sea, not returning until spring to nest.
- Hazing methods that have been tested and found effective would be used to frighten gulls off the islands, such as lasers, spotlights, pyrotechnics, biosonics, predator calls, air cannons, effigies, and kites.
- Most mice will retreat to their burrows to die. Any mice remaining above ground will be collected.
- If another less toxic, effective, permanent removal method were in existence, it would have been implemented already.
- Contraceptive methods would not work because they are not designed for full eradication, just control; and are not yet available. Their use would require repeated replenishment, also by helicopter, to reach steep and inaccessible areas. This would result in ongoing disturbance of sensitive species within the wildlife refuge.
- Pellets that may enter surrounding waters are highly soluble, will drop to the ocean floor, and the Brodifacoum would dilute quickly. Studies on other islands show that Brodifacoum binds to the sea bottom and becomes unavailable.

The Service has made every effort to address all concerns, including the 500-plus comments received on the Environmental Impact Statement.

*International Union Conservation of Nature (IUCN) Endangered species; State of California "Species of Special Concern."

Sent from my iPad

From: Steven Lanum
To: Farallon Islands Consistency
Subject: U.S. Fish and Wildlife Service's Mouse Eradication Plan
Date: Wednesday, December 1, 2021 6:26:01 PM

I am writing in support of the Coastal Commission's Staff recommendation to adopt the U.S. Fish & Wildlife Service Plan to permanently restore the ecosystem of the Farallon Islands by eradicating house mice. The Farallon Islands National Wildlife Refuge is at a critical juncture in terms of the restoration of its impaired ecosystem. The Plan's methods have been used successfully to remove rodents on almost 700 islands throughout the world.

House mice infestation has already caused the decline of native seabirds. Of utmost concern is the Ashy Storm-Petrel whose numbers have plummeted by nearly half in just 12 years. However, all endemic species, avian and other, will benefit from implementation of the Plan.

The Service's Plan is to drop and hand-place Brodifacoum 25D-Conservation, a rodenticide developed and EPA-labeled specifically for use in restoring island habitats. Past eradications have zero to low mortality of non-target species, and the overwhelming result has been complete removal of rodents and rebounding of at-risk native species. Brodifacoum-25D Conservation was specifically exempted from restrictions of State Assembly Bill AB-1788 due to its importance in restoring habitats. It was used to successfully eradicate rats from Anacapa Island in California's Channel Islands, where habitats are similar to the Farallon Islands. Use on the Farallones by licensed professionals is completely different from unregulated and indiscriminate use on the mainland.

The timing of the Plan's implementation (fall/early winter) would be when most seabirds have left the islands to feed at sea, not returning until spring to nest. Hazing methods that have been tested and found effective would be used to frighten gulls off the islands. If a less toxic, equally effective, permanent removal method were in existence, it would have been implemented already. Contraceptive methods are impractical and unlikely to be effective. Pellets that may enter surrounding waters are highly soluble, will drop to the ocean floor, and the Brodifacoum would dilute quickly. Studies on other islands show that Brodifacoum binds to the sea bottom and becomes unavailable.

The Service has made every effort to address all concerns, including the 500-plus comments received in response to the Environmental Impact Statement. The time to act is now. Science and successful history demand action.

Thank you for your attention.

Steven Lanum
355 Buena Vista Ave., No. 308W
San Francisco, CA 94117

From:	Bill Lenarz
To:	Farallon Islands Consistency
Subject:	Use of Brodifacoum 25D
Date:	Thursday, December 2, 2021 8:44:34 AM

I usually am against the use of pesticides, but am 100% in favor of the proposed use of Brodifacoum 25D to eradicate house mice from the Farallon Islands. This method has been used many times on other islands with no or minimal unintended adverse effects. I think it would be criminal to not use the method and allow house mice to continue having significant impacts on the Farallon Islands ecosystem. There are no other methods known for the eradication of rodents on islands. Please allow the project to proceed.

William H. Lenarz, PhD

From: Robert Cogswell
To: Energy@Coastal
Subject: Use of poison on the Farallon Islands
Date: Thursday, November 25, 2021 7:32:35 AM

The plan to poison any and all species now populating the Farallon Island chain is ill thought out and ignores the obvious, irreversible harm that will ensue and persist from such an ill advised and misguided effort to control the unwanted population of critters in the Island chain. The unregulated spread of the poison throughout the food chain spells an environmental disaster that will permeate many more lifeforms than are currently at risk. Stop playing God with your ill thought out plan to remove the target species. Once out of the box, the substances that are proposed for use will proliferate beyond any attempted remediation. This promises to be an environmental disaster for which there will be no remedy!

From:	K Rademacher
To:	Farallon Islands Consistency
Subject:	We support the US Fish & Wildlife Service"s Mouse Eradication Plan
Date:	Thursday, December 2, 2021 12:44:11 AM

California Coastal Commission,

As a naturalist working my entire career in California, including work on Santa Cruz Island with feral pig eradication efforts, I unequivocally support the US Fish and Wildlife Service's Mouse Eradication Plan. I urge you to rule that the plan is indeed consistent with the Coastal Protection Program.

Thank you for carefully deliberating and recognizing the merits of the plan.

Sincerely,

Kurt Rademacher
107 Palm Avenue
Corte Madera, CA 94925
krademacher3@comcast.net

From:	safutrell@everyactioncustom.com on behalf of Sherrill Futrell
To:	Farallon Islands Consistency
Subject:	Why are you allowing the POISONING of the Farallons?
Date:	Monday, November 29, 2021 3:10:55 PM

Dear Farallon Islands,

THIS IS INSANE. DENY the proposal to aerially apply (by helicopter) the toxic rodenticide brodifacoum to kill house mice on the Farallon Islands National Wildlife Refuge. Globally significant wildlife populations inhabit the Farallones, including hundreds of thousands of seabirds and thousands of seals and sea lions. These include: 13 seabird species that nest on the islands; pinnipeds including Northern fur seals, Steller sea lions, CA sea lions, harbor seals, and northern elephant seals; and endemic species including white sharks, hoary bats, and arboreal salamanders.

Aerial application of brodifacoum places at risk the mammalian and avian wildlife on the Farallon Islands, as well as marine life that may be exposed when the poison washes or settles into the ocean. There is no way to limit the impact to the targeted house mouse. A 2015 study conducted after aerial drop of rodenticides on Palmyra Island off the coast of Hawaii reported: “We documented brodifacoum [rodenticide] residues in soil, water, and biota, and documented mortality of nontarget organisms. Some bait (14–19% of the target application rate) entered the marine environment to distances 7 m from the shore. After the application commenced, carcasses of 84 animals representing 15 species of birds, fish, reptiles and invertebrates were collected opportunistically as potential nontarget mortalities. In addition, fish, reptiles, and invertebrates were systematically collected for residue analysis. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed. Although detection of residues in samples was anticipated, the extent and concentrations in many parts of the food web were greater than expected.”

Home to rare, endemic seabirds such as the ashy storm-petrel, the Farallon Islands certainly have a serious mouse problem – 59,000 rodents occupy the rocky islands. Mice compete with native species for resources and attract an average of six burrowing owls a year. Owls prey upon ashy storm-petrels when mouse populations drop during the winter, killing hundreds of petrels annually. The global population of the ashy storm-petrel is small (10,000 – 20,000), but it is not considered an endangered species.

As important as native ecosystems are, the application of a poison is a toxic, simplified solution to a complex problem that requires the wisdom of nature herself, as species evolve and adapt to new conditions.

THANKS.

Sincerely,
Sherrill Futrell
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