CALIFORNIA COASTAL COMMISSION
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Th11b

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE

Received between

December 8, 2021 and 5pm on December 10, 2021

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CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

Letters from Elected Officials and Organizations

LEON E. PANETTA
15 PANETTA ROAD
CARMEL VALLEY, CALIFORNIA 93924

December 9, 2021

California Coastal Commissioners
c/o Energy Ocean Resources and Federal Consistency Division
45 Fremont Street, Ste. 2000
San Francisco, California 94105-2219
Re: CD-0002-19 (Agenda item: W14a) - Deny

Dear Commissioners:

California's network of iconic National Marine Sanctuaries provides a model for ocean conservation throughout the world. As Congressman for the Central Coast, I am proud to have authored the legislation that created the Monterey Bay National Marine Sanctuary. While serving in Congress and the White House, I was a part of the bipartisan movement that built and defended these sites. I write today to hereby ask that the Coastal Commission deny a finding of consistency for the current U.S. Fish and Wildlife Service proposal for the Greater Farallones National Marine Sanctuary.

The precautionary principle needs to prevail within our Marine Sanctuary sites of all places, particularly in the context of new and emerging threats to the health of our oceans. Experimenting with a known multi-species poison already prohibited from retail sale in California, even as our state legislature is clearly moving toward banning its application on state lands with few exceptions, simply does not make sense. To attempt to spread this compound at any time in proximity to the Dungeness crab or salmon seasons only further courts economic disaster.

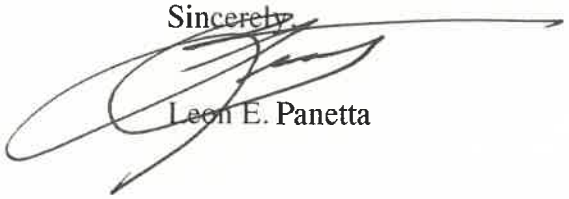
My own lifelong efforts toward protecting California's amazingly productive marine ecosystems grew from my family background in the sustainable fishing community. We always knew that our lives and our livelihood depended on a healthy ocean, and I have never forgotten that principle.

Please also remember that principle when the Commission considers the recent plan by the U.S. Fish and Wildlife Service and consider how many Californians depend on the safe stewardship of our coastal waters by the National Marine Sanctuary System, and do nothing to erode this protective network.

Please deny consistency for item CD-0002-19 when it comes before your Commission.

My sincere thanks to each of you for your ongoing work on behalf of the health of our oceans.

Sincerely,



Leon E. Panetta

LEP:sbr

DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
750 PACIFIC HIGHWAY
SAN DIEGO CA 92132-0058

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Mr. John Ainsworth
Executive Director
California Coastal Commission
45 Fremont Street Suite 2000
San Francisco, CA 94105-2219

SUBJECT: NAVY SUPPORT FOR CD – 0006 – 21 US FISH AND WILDLIFE SERVICE FOR SOUTH FARALLON ISLANDS INVASIVE HOUSE MOUSE ERADICATION PROJECT

Thank you for the opportunity for Navy Region Southwest to express support on the Consistency Determination review for the South Farallon Islands Invasive House Mouse Eradication, proposed by the US Fish and Wildlife Service.

Navy Region Southwest oversees the operation and management of the 10 US Navy installation commands in California, Arizona, Nevada, Utah, Colorado, and New Mexico. Our Commander serves as the regional environmental coordinator for California and oversees environmental compliance actions with local, state, and federal regulatory agencies. Therefore, we are authorized to speak on behalf of the Navy's interest in the southwest region. The US Navy utilizes San Clemente and San Nicolas Islands (SCI and SNI) as training spaces crucial to maintaining military readiness for our sailors and marines.

The Navy protects and enhances the natural resources on SCI and SNI while fulfilling its military training requirements. The Ashy Storm-petrel, a rare seabird of the Californian and Northern Mexican islands, breeds on SCI and SNI. Because of this seabird's rarity and the threat of decline, particularly on the Farallon Islands where introduced house mice directly and indirectly negatively affect their numbers, the species was petitioned for listing under the Endangered Species Act (ESA) in 2013 and may be petitioned again in the future. An Ashy Storm-petrel listing under the ESA has the potential to constrain critical Naval training on SCI and SNI.

The Navy is a proud cosignatory of the Ashy Storm-petrel management and monitoring team's Letter of Intent, a multi-agency partnership to promote healthy population numbers of the Ashy Storm-petrel across its range. The Navy funds monitoring and habitat improvement for Ashy Storm-petrels at SCI and SNI and the adjacent California Coastal National Monument offshore rocks, but it will take a range-wide conservation effort to achieve success for the species. Our environmental staff has reviewed the Final Environmental Impact Statement for the South Farallon Islands Invasive House Mouse Eradication Project and concurs that the proposed action, successfully implemented, will have tremendous long term ecological benefits that far outweigh the short-term environmental costs.

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Therefore, Navy Region Southwest would like to express its support for the invasive house mouse eradication on the Farallon Islands. We support the California Coastal Commission staff recommendation of June 27th, 2019 that the Commission find the project consistent with the environmentally sensitive habitat policy of the Coastal Act (Section 30240).

J. C. GOLUMBFSKIE-JONES
Fleet Environmental Coordinator
By direction
Of the Commander

Copy to: US Fish and Wildlife Service

COUNTY OF MARIN

BOARD OF SUPERVISORS
DENNIS RODONI
FOURTH DISTRICT

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December 10, 2021

California Coastal Commission
455 Market Street
San Francisco, CA
Sent via email

RE: Agenda Item Th11b-CD-0006-21 (12/16/21)

Dear Commissioners:

I recommend the Commission find that the Service's project to remove nonnative house mice from the Farallon Islands is fully consistent with the California Coastal Management Program.

Representing the Marin County coastal district across from the Farallones, I have come to understand that this proposed highly regulated and one-time- use (two closely spaced applications) project is vastly different from the chronic use of rodenticides on the mainland, and it will have long-term benefits, restoring the island.

California proposed Bill AB 1788, which would ban the indiscriminate use of second-generation anticoagulant rodenticides on the mainland, makes a notable exception for conservation use on islands to protect California's unique island ecosystems from nonnative invasive species, such as the house mouse on the Farallones. Marin County has an integrated pest management (IPM) policy, which allows the appropriate use of chemicals for conservation purposes.

Scientists have conducted exhaustive scientific studies and environmental documentation. They analyzed the alternatives thoroughly before drawing a conclusion on a preferred alternative. As numerous previous island restorations around the world have demonstrated, there is only one way to eradicate the mice successfully. Among the recent successful projects is Anacapa Island down the coast, where rodenticide was used to eradicate the introduced rodents and allow threatened native seabirds to recover and even recolonize.

In this time of unprecedented human-caused stressors to the natural environment, such as global warming, this proposed project is an opportunity to reverse past human-caused damage and restore the South Farallon Islands to a more natural state.

COUNTY OF MARIN

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Unless a proven alternative becomes available during this approval process, I urge the commission to move forward with the consistency determination.

Please feel free to contact my office if you have any questions or wish to further consult with me.

Sincerely,

Dennis Rodoni, District 4
Marin County Board of Supervisors

FARALLON INSTITUTE

101 H Street, Suite Q
Petaluma, CA 94952
707.981.8033
www.faralloninstitute.org

Dear California Coastal Commission,

On behalf of the Farallon Institute, I am writing to support a positive Consistency Determination for the proposal by USFWS to eradicate invasive house mice from the Farallon Islands National Wildlife Refuge.

I hold a Ph.D. in Ecology from UC Davis, am an active seabird population ecologist with many federal and state grants, currently serve as the co-Chair for the California's Ocean Protection Council Scientific Advisory Team, and, most importantly, ran the research program on the Farallon Islands for Point Blue Conservation Science (formerly Point Reyes Bird Observatory) for 20+ years, 1986 - 2007. In the 1980s and 1990s I spent approximately 6 months per year living and working on the islands, and some of my research was focused on the wildlife species most affected by the non-native mice. Thus, I am uniquely qualified to make this recommendation on behalf of Farallon Institute.

First, I can tell you from personal experience and without hesitation that the mice represent a big and long-standing ecological problem for the Farallon Islands. During the summer and fall the mice population explodes, and they either directly or indirectly affect the seabirds and other species, some endemic, that the Refuge was designed to protect. Direct effects include depredation of seabird eggs and chicks. Indirect effects include attracting other predators which cause depredation on adult seabirds, including the rare Ashy Storm Petrel and Cassin's Auklet (these are both small seabirds). It is important to recognize that demonstrating these ecological interactions and effects on seabird populations is a difficult undertaking. However, the science on the effects of invasive rodents on seabird breeding colonies is robust, and where ever mice have been eradicated from seabird islands around the world, the seabirds have responded, immediately and in an extremely positive manner. There is no other place in the continental United States outside Alaska with seabird populations of the scale or importance of the Farallones. This is due to the unique ocean productivity in the region which supports roughly a million seabirds of 13 species. The Farallon Islands National Wildlife Refuge is a biodiversity gem that requires our immediate attention to rectify a long standing problem. A positive Consistency Determination will also support Governor Newsom's Executive Order "30 by 2030" to promote biodiversity conservation in the State of California.

The rodenticide proposed is a tried and true method to remove invasive rodents from seabird refuges. There are no other viable options with less risk. The rodenticide has been successfully used around the world to effectively and efficiently eradicate rats and mice from hundreds of island "hotspots" of biodiversity, with minimal damage to other species, and essentially no effect on other native species' populations.

It is true that there probably will be some collateral damage on a few individuals, but these potential effects on other species (e.g. mortality of gulls) will have no impact on their populations. Numerous compelling population models have been developed that indicate this is the case, and we are convinced that any incidental mortality of other species will be offset by long-term healthy and biodiverse seabird populations on the FINWR.

Our recommendation is that the CCC support the Consistency Determination, and allow the Invasive Mouse Eradication Program to proceed.

Thank you for considering our perspective and please reach out to me if I can provide any further information.

Best regards,

William J. Sydeman, Ph.D.
President and Chief Scientist | Farallon Institute
www.faralloninstitute.org
wsydeman@faralloninstitute.org

December 10, 2021

California Coastal Commission
North Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

To: Steve Padilla, Chair, California Coastal Commission

CC: Jack Ainsworth, Executive Director

Re: CD-0006-21, U.S. Fish and Wildlife Mouse Eradication Project

Dear Chair Padilla,

The Surfrider Foundation is a grassroots non-profit environmental organization dedicated to the protection of our ocean, waves, and beaches for all people. Surfrider has been involved in marine reserve and marine protected area work in California for the past twenty years, and we strongly believe that California's coastal environment depends on the ecological success of these protected areas. Due to the proximity of U.S. Fish and Wildlife's (USFW) proposed House Mouse Eradication Project to the Southeast Farallon Island State Marine Reserve and the Southeast Farallon Island State Marine Conservation Area; Surfrider urges the Commission to adopt the following priorities in any project proposal in this location in order to approach the safeguarding of marine life and waters around the Farallon Islands with the utmost caution.

Recommendation 1: Maximum precautions must be taken to ensure that no toxic substances enter coastal waters. The current proposal includes plans to apply rodenticide-laiden bait across dry land below the Mean High Water Spring Mark, which is described as the highest level of tides calculated from predictions over a 19-year period. We interpret this tide line to still represent an average, and a very high tide could still wash rodenticide pellets directly into the marine reserve. This is not unrealistic, as bait placement is expected to take place in December, when the Pacific coast often experiences its highest annual King Tides. The threshold that USFW should avoid is the extreme high water mark. This should be calibrated to the highest 2022 King Tide projections, with a buffer that accounts for potential placement error during application.

In addition, we strongly echo the need to closely follow weather forecasts as a significant rain event will wash the bait directly off the Islands and into the surrounding reserves. While the proposal states that there is desirability in a significant rain event that removes the bait soon after it is deployed and is no longer needed on the ground, this is a narrow window. A worst-case scenario for intertidal life would be a significant rainfall event that occurs too soon after the bait is deployed, wherein bait that is still highly toxic is washed in high quantities into the ocean where it runs the

risk of being incidentally or indirectly consumed by any marine species.

Recommendation 2: Nearshore water quality monitoring, non-target species monitoring and fish tissue sampling requirements should be expanded. The Draft Mitigation and Monitoring Plan provides for the collection of water and biota, analysis of rodenticide residues, and monitoring of bait drift. The Plan states that a summary of the results of non-target monitoring will be made available to the public. As the Farallon Islands are highly regarded by the public as one of the most precious biodiversity hotspots in the world, we recommend that monitoring reports of nearshore water quality and Brodifacoum residue testing of non-target species, including intertidal, subtidal, avian, and terrestrial wildlife, be made public before the second bait application is deployed.

Additionally, we recommend that seabird and fish tissue sampling for Brodifacoum residue be conducted for four years after the project is completed. As stated in the staff report for this item, biological sampling at Desecheo Island revealed that Brodifacoum residue can persist in parts of the food web for up to four years[1] (page 56, Staff Report).

Recommendation 3: Include contingency planning in the event sea turtles are observed. USFW notes that sea turtles are rare in the waters surrounding the Farallon Islands and that risks to turtles would be minimized by conditions placed to protect against bait drift**.** It appears that due to the low risk, turtles are not addressed in the Draft Non Target Species Contingency Plan. Due to the highly protected status of the multiple endangered species of sea turtles observed in the Greater Farallon Islands (Green Sea Turtle, Leatherback Sea Turtle, Pacific Olive Ridley Sea Turtle and Loggerhead Sea Turtle), Surfrider suggests addressing the scenario where turtles are observed within visual distance of the island. An appropriate response would be to temporarily suspend the bait broadcast until sea turtles are determined to no longer be onshore or nearshore.

The South Farallon Islands and surrounding waters are some of the most ecologically rich areas of the world. We appreciate the Commission's attention to marine life and waters in consideration of these project recommendations.

Sincerely,

Laura Walsh
California Policy Manager
Surfrider Foundation

[1] https://documents.coastal.ca.gov/reports/2021/12/Th11b/Th11b-12-2021-report.pdf

National Audubon Society
225 Varick Street, 7th Floor
New York, NY 10014

212.979.3196
www.audubon.org

December 10, 2021

Mr. Steve Padilla, Chair
California Coastal Commission
455 Market St., Suite 300
San Francisco, CA 94105

Re: Support for Agenda Item 11b, Consistency Determination No. CD-0006-21, Invasive House Mouse Eradication, Farallon Islands National Wildlife Refuge

Dear Chair Padilla and Commissioners,

On behalf of our 1.3 million members, the National Audubon Society is writing in strong support of the Coastal Commission staff recommendation of Concurrence, with Conditions, of this Project with the Coastal Act. We encourage the Commission to approve the recommended Motion on page six of the staff report.

We fully agree with Commission staff and the U.S. Fish and Wildlife Service ("Service") that the Project is fully consistent with the Coastal Act and will provide a multitude of benefits to 13 species of breeding seabirds, several endemic species, and the entire Farallon Islands ecosystem. We also agree with staff on the urgent need to proceed with the Project. The Project presents a rare opportunity to remove a human-caused stressor to support the resilience of the Farallon Island ecosystem to longer-term and more intractable threats -- especially climate change. The Project will help fulfill Commission,[1] state,[2] and federal[3] goals recently put in place to protect biological diversity and safeguard ecosystems against climate change.

Audubon's interest in the Farallon Islands
Audubon's mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. The Farallon Islands National Wildlife Refuge is a global Important Bird Area, hosting the largest seabird breeding colony in the continental United States. More than 300,000 individuals of 13

[1] Coastal Commission. 2021. Climate Change Planning. https://www.coastal.ca.gov/climate/climatechange.html.
[2] California Natural Resources Agency. 2021. California Climate Adaptation Strategy. https://resources.ca.gov/Initiatives/Building-Climate-Resilience/2021-State-Adaptation-Strategy-Update
[3] The White House. 2021. Executive Order on Tackling the Climate Crisis at Home and Abroad. https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/

species breed on the islands, including Tufted Puffin, Common Murre, Cassin's Auklet, Ashy Storm-petrel and Brandt's Cormorants.

Of exceptional interest to Audubon are the benefits of the Project to the Ashy Storm-petrel, a rare, elusive seabird almost entirely endemic to California. In 2014 Audubon convened the world's experts on the species to complete the *Conservation Action Plan for the Ashy Storm-petrel*.[4] The eradication of invasive mice on the Farallon Islands is the top priority identified by the nearly 20 experts who completed the collaborative Plan, for actions needed now to protect the species from further declines. Since the Plan's completion thousands of hours of effort have been directed to conservation actions for Ashy Storm-petrel including developing standardized index monitoring; construction of nest habitat; and support for the house mouse eradication planning. In sum, an exceptionally dedicated group of marine ornithologists, funders and organizations are committed to the stewardship of this diminutive, rare and unique seabird.

The Service in collaboration with Commission staff have substantially improved the Project

As the Service presented to the Commission in 2019, the Preferred Alternative will use an estimated 2,880 pounds of bait pellets, treated with a total of approximately 1.2 ounces of brodifacoum product (0.0004 ounces per pound) in the eradication action. In April 2021 the Service submitted additional information and analyses in response to thoughtful questions raised by the Commissioners. Specifically, the Service submitted a Draft Operational Plan; a Draft Mitigation and Monitoring Plan; a Draft Bait Spill Contingency Plan; and a Draft Non-target Contingency Plan. The Coastal Commission added Conditions 2 and 3 which relate to specially timed opportunities for the Commission's Executive Director to ensure the final Plans listed remain consistent with the Coastal Act, as well as seven additional commitments by the Service related to implementation, project monitoring, activity tracking and reporting.

These collective conditions, commitments and actions on the part of the Service and the Commission together comprise an exhaustively reviewed, science-based Project with highly robust safeguards in place. This approach provides the Commission and public with assurance of the Project's consistency with the Coastal Act and stringent protection of the island and marine ecosystem.

The urgency of the Project before the Commission today

We agree with the staff report's thorough justification of the need for "swift and meaningful" conservation action for the Farallon Islands. The Report notes that climate-related threats and stressors to the ecosystem either cannot be overcome, or will take many decades to reverse or stabilize. These stressors include drought, declining productivity of oceanic foraging habitat,

[4] Parker, Mike. 2016. Conservation Action Plan for Ashy Strom-petrels in California and Baja California. Unpublished Report. California Institute of Environmental Studies, Davis, CA. https://ciesresearch.org/wp-content/uploads/assp-cap-final-september-2016.pdf

increased storm intensity, and sea level rise. We agree that removing the impacts of house mice could help buffer the species from these events.

In specific regard to seabirds, in the Pacific and around the world, accelerating and compounded climate change stressors are hitting hard this already-imperiled group of birds. As the Service notes in the Report, since 2009 there have been at least three unprecedented, large-scale die-offs of seabirds, in these cases Brandt's Cormorant, Cassin's Auklet, and Common Murre, in the eastern North Pacific Ocean.[5] These die-offs resulted from climate change- driven episodes of warm water patches which reduced or eliminated prey resources for seabirds for 1-3 years. In summer 2021 an exceptional heat wave in the Pacific Northwest caused mass mortality of intertidal marine invertebrates as well as a significant loss of chicks at tern colonies due to overheating.[6]

Finally, there may be a new and especially devastating threat to seabirds from house mice on the Farallones in the form of direct mortalities. Seabirds have evolved to persist in incubating their eggs through adversity. This evolutionary strategy is successful for enduring fierce storms and aggressive neighboring birds, but leaves seabirds extremely vulnerable to non-native, predatory rodents. For example on Midway Island National Wildlife Refuge in Hawaii, as Black-footed and Laysan albatrosses incubate, many are now being bitten and preyed upon by mice during the night – causing debilitating injuries and often death. During the 2015– 2016 nesting season predation and disturbance by house mice was documented there for the first time, resulted in 70 abandoned nests, 42 adult birds killed and 480 wounded. In the following nesting season the affected area increased, resulting in 242 dead adults, 1,218 injured birds and 994 abandoned nests. The mice may be driven by thirst for seabird blood and/or hunger due to drought on the islands. The Fish and Wildlife Service has been forced to mobilize resources to plan and conduct mouse eradication activities on Midway to protect these albatrosses.[7] This horrific scenario is wholly possible at the Farallon Islands, as drought conditions increase.

In sum, we are in strong support of the Commission approving the recommended Motion on page 6 of the staff report. This approval will go far to safeguard seabirds and the entire Farallon Island ecosystem. It will help the Service meet its long-standing management goal of

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[5] Piatt, John F., Julia K. Parrish, Heather M. Renner, Sarah K. Schoen, Timothy T. Jones, Mayumi L. Arimitsu, Kathy J. Kuletz et al. "Extreme mortality and reproductive failure of common murres resulting from the northeast Pacific marine heatwave of 2014-2016." *PLoS One* 15, no. 1 (2020): e0226087.

[6] Mortality Event at West Seattle Caspian Tern Colony. https://wa.audubon.org/news/mortality-event-west-seattle-caspian-tern-colony

[7] Duhr,M. et al. 2019. Control of house mice preying on adult albatrosses at Midway Atoll National Wildlife Refuge. In: C.R. Veitch, M.N. Clout, A.R. Martin, J.C. Russell and C.J. West (eds.) (2019). Island invasives: scaling up to meet the challenge, pp. 21–25. Occasional Paper SSC no. 62. Gland, Switzerland: IUCN. http://www.issg.org/pdf/publications/2019_Island_Invasives/Duhr.pdf

eradicating invasive house mice from the Farallon Islands National Wildlife Refuge in order to eliminate their negative impacts on the native ecosystem of the South Farallon Islands. We have full confidence in the USFWS's Plans and appreciate the additional safeguards provided by this Permit with conditions. Thank you for your consideration of our comments and your dedication to protecting coastal resources.

Sincerely,

Donald E. Lyons, Ph.D.
Director of Conservation Science
Audubon Seabird Institute
National Audubon Society

Western Field Ornithologists, Inc.

c/o Jon L Dunn (President), 24 Idaho St., Bishop, CA 93514

December 10, 2021

Public Comments Processing
California Coastal Commission
455 Market St. Suite 300
San Francisco, CA 94105

Dear Commissioner,

Western Field Ornithologists (WFO) is an organization of amateur and professional field ornithologists that promotes the study of birds throughout western North America. Our organization strives to increase knowledge, appreciation, and protection of birds and their habitats through annual meetings, field trips, and publications. Our publications include *Western Birds*, a quarterly, peer-reviewed journal that focuses on field-oriented descriptive ornithology, and *Studies of Western Birds*, a peer-reviewed monograph series of in-depth content on important topics within the study of western birdlife. WFO's membership consists of approximately 1,000 members who greatly value and enjoy birds and promote their conservation.

Our organization has considered the US Fish and Wildlife Service's plan to remove invasive house mice from Southeast Farallon Island. We support the "preferred alternative" (an aerial broadcast of the rodenticide Brodifacoum) to protect the birdlife and ecology of Southeast Farallon Island. This project is also vital to ensure that the tiny, vulnerable global population of Ashy storm-petrel is protected for future generations. These goals fit within our mission of protecting birds and their habitats. We thus request that you approve the upcoming request for a consistency determination on the Farallon Island mouse eradication plan. It is backed by excellent science and mitigation efforts.

It is important that action be taken to ensure that the biological diversity present today is preserved into the future. Many of our Board and membership are active field ornithologists whose most memorable life experiences involve unforgettable moments with birds in the field. Encountering rafts of storm-petrels at sea is a mesmerizing experience. Observing these tiny birds that are so well-crafted for life in turbulent seas – a life so completely different than our own – is an unforgettable experience. Sadly, many naturalists today are experiencing shifting baselines: much biological diversity around us is shrinking, and future generations are inheriting a world where many natural phenomena are dimming relative to what we encountered in past years or decades. Don't let those rafts of Ashy storm-petrels shrink any further beyond what they

are today. Burrowing Owls slowly eroding the Ashy storm-petrel population not only chips away at a threatened species, it dims the concentrations and phenomena of potential experience for young and future generations of naturalists. Long-term delay could cause Ashy populations to dwindle dangerously low for lasting viability as a species.

We understand there will likely be some incidental mortality of unintended species. Given that it would occur at only one point in time, and in species with more robust population sizes than Ashy storm-petrels, it is clear the benefits of this project will easily outweigh the costs.

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. We recognize the potential impacts but view them as a necessary aspect to achieving the goal of mouse eradication.

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.

One of WFO's landmark publications, *California Bird Species of Special Concern: a ranked assessment of species, subspecies, distinct populations of birds of immediate conservation concern in California* highlights the status and conservation needs of California bird species of special concern, including the Ashy storm-petrel. In 2008 when this important work was published, Carter et al. suggested a mouse eradication program be implemented on Southeast Farallon Island in order to protect the Ashy storm-petrel. We firmly stand behind this recommendation.

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

Sincerely,

Jon L. Dunn (President), and the Board of Directors of Western Field Ornithologists

Literature Cited:

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

National Wildlife Refuge Association

December 9, 2021

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

Subject: Consistency Determination for U.S. Fish and Wildlife Service, South Farallon Islands Invasive House Mice Eradication Project, Farallon Islands National Wildlife Refuge (December Meeting Agenda Th 11b: CD-0006-21)

Dear Mr. Ainsworth:

On behalf of the National Wildlife Refuge Association, I am writing in support of the U.S. Fish and Wildlife Service's proposal to eliminate non-native invasive house mice from the South Farallon Islands which are part of the Farallon Islands National Wildlife Refuge. We believe the project is consistent with the California Coastal Management Act and we agree with the California Coastal Commission's staff report (12/2/21) which supports this conclusion.

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

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

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

Since islands are particularly vulnerable to invasive species and yet provide a great opportunity for success, a number of island eradication projects have been successfully undertaken on wildlife refuges across the country. For example, a 2008 project on the formerly named "Rat Island" within the Alaska Maritime National Wildlife Refuge so successfully eliminated Norway rats on the island that bird populations rebounded and the island's name could then be changed back its original Aleut name of

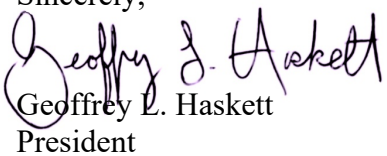
Hawadax Island. Across the country, at Desecheo National Wildlife Refuge in Puerto Rico, removal of non-native goats, rhesus macaques, and rats resulted in the resurgence of seabird populations as well as a Federally-threatened cactus species. Other successful island rodent eradication efforts were completed at Palmyra Atoll NWR and Midway Atoll NWR in the Pacific. At Palmyra, native trees began resprouting within a month of black rat removal. At Midway Atoll, populations of the seabird Bulwer's Petrel increased dramatically. All used similar eradication methods as are being proposed at the Farallon Islands NWR.

As with many islands, the flora and fauna of the Farallon Islands evolved without the presence of land-based mammals. Human activities on the South Farallon islands in the 19th and early 20th centuries included the introduction of non-native rabbits, cats and house mice. Since the 1970s, increases in numbers of seabird populations have been largely due to removal of non-native rabbits and cats. But the ecosystem of the South Farallon Islands is still out of balance due to presence of non-native house mice. Mice densities in the fall have been the highest recorded anywhere for this species and their numbers can be easily appreciated when viewed on recorded videos. We support the proposed mouse eradication project since we anticipate an even greater improvement in native wildlife species, especially ashy storm petrels and Leach's storm petrels, as well as the endemic Farallon arboreal salamander and the endemic Farallon camel cricket following removal of house mice.

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

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

Sincerely,



Geoffrey L. Haskett
President

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December 9th, 2021

CALIFORNIA COASTAL COMMISSION
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

RE: Letter of support for the proposed eradication of house mice from the Farallon National Wildlife Refuge (No. CD-0006-21)

Thank you for the opportunity to comment on staff recommendations for the California Coastal Commission's Hearing on December 16th, 2021. The California chapter of The Nature Conservancy (Conservancy) supports the goals of the United States Fish & Wildlife Service's proposed House Mouse Eradication Project in the Farallon Islands National Wildlife Refuge which is an important component of their 2008 Comprehensive Conservation Plan for the Refuge. The Conservancy likewise supports the *California Coastal Commission staff recommendation of December 2nd, 2021 that the Commission conditionally concur with the USFWS' consistency determination (No. CD-0006-21) with conditional concurrence based on FWS acceptance of the three conditions presented in the Staff report.*

The Conservancy has worked in California for 60 years to preserve and protect the state's extraordinary biological diversity. Our California Islands Program has delivered some our biggest successes over the past four decades – successes born of an extraordinary coalition with other non-profit organizations, university researchers, and federal and state agencies which brought Santa Cruz Island and the seven other California Channel Islands back from the brink of ecological collapse and set them firmly on the path to recovery. The Conservancy owns 76% of Santa Cruz Island, and our successful effort to eradicate feral pigs there in the mid-2000's in partnership with the National Park Service (which owns the remainder of the island) and with other stakeholders was an important and necessary step is setting the native biodiversity of this island on the path to recovery[1]. The subsequent recovery of the federally endangered and endemic Santa Cruz Island fox resulted in its delisting. This and the recovery of other endemic and rare plant and animal species and of the island's vegetative cover, gives the Conservancy first-hand experience with the conservation benefits that can result from the eradication of non-native invasive vertebrates from islands.

[1] Morrison, SA. 2007. Reducing risk and enhancing efficiency in non-native vertebrate removal efforts on islands: a 25 year multi-taxa retrospective from Santa Cruz Island, CA. Pp. 398–409. *In* G.W. Witmer, W.C. Pitt, and K.A. Fagerstone, *eds*. Managing Vertebrate Invasive Species: Proceedings of an International Symposium. USDA/APHIS/WS, National Wildlife Research Center, Fort Collins, Colorado, USA.

Further north on California's coast, the USFWS has led collaborative efforts to restore the Farallon Islands, home of the largest seabird colony in the contiguous United States, numbering over 300,000 birds and 13 species including half of the world's population of the globally rare Ashy storm petrel. This group of small islands is also home to endemic terrestrial animals including the Farallon arboreal salamander, and the endemic Farallon camel cricket, and they host resting and breeding colonies of five species of marine mammal. Much has been accomplished there already, including the eradication of cats and rabbits which had devastated seabird colonies and island vegetation respectively. However, the presence of the house mouse there, often at population densities that are among the highest recorded on islands anywhere on Earth, threatens to reverse the breeding successes of the seabirds whose eggs they eat, as well as the survival of the endemic salamander and camel cricket. The Farallon National Wildlife Refuge is a vital ecological resource for the state of California and the nation. A recent analysis further identified the eradicating house mice on the Farallon Islands as globally important for the protection of native species[2].

The Conservancy supports the proposed plan to eradicate house mice from the Refuge as a vital step in maintaining and furthering their ecological recovery and their long-term ability to support nesting seabirds, endemic animals and native vegetation and marine life such as the marine mammals that rest and breed there.

Sincerely,

Mike Sweeney
Executive Director

[2] Holmes ND, Spatz DR, Oppel S, et al. 2019. Globally important islands where eradicating invasive mammals will benefit highly threatened vertebrates. PLOS ONE 14:e0212128.

Point Blue Conservation Science

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SUPPORT
Agenda Item Th-11-b CD-0006-21
Point Blue Conservation Science
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California Coastal Commission
E-mail: EORFC@coastal.ca .gov

Re: Item Th-11-b CD-0006-21
U.S. Fish and Wildlife Service, San Francisco
Support for Southeast Farallon Island Nonnative Mouse Eradication Project

Dear Commissioners:

Fifty-three years ago, biologists from Point Blue Conservation Science (known then as Point Reyes Bird Observatory) landed on the Farallon Islands for the first time. Ever since then, scientists from Point Blue, a Bay Area non-profit organization focused on applied conservation science, have maintained a continuous presence on the islands: 24 hours a day, 365 days a year. Our mission is to advance the conservation of birds, other wildlife, and ecosystems through science, partnerships, and outreach. Our role on the islands is simple: we use our expertise in biology, ecology, and conservation to provide rigorous science to the US Fish and Wildlife Service (USFWS), helping them make decisions that will ensure a healthy ecosystem on the islands for generations to come.

Right now, the USFWS is considering an important decision and a significant opportunity for ecological restoration: the eradication of the invasive house mouse from the Farallon Islands. We at Point Blue would like to voice our strong support for this project.

Located just 27 miles from San Francisco, the rugged islands of the Farallon Islands National Wildlife Refuge are a unique wildlife haven in need of ongoing restoration, protection, and management. Referred to by some as “California’s Galapagos,” the Farallones host the largest seabird breeding colony in the continental United States and 25% percent of California’s breeding seabirds (more than 300,000 individuals of 13 species). Before

human-caused disturbances, more than one million seabirds bred in the Farallones. We commend the USFWS's 40-year efforts to restore the Farallones by removing invasive plants and animals. Introduced, invasive cats and rabbits were removed with positive ecological responses.

Today, the invasive house mouse is the last non-native, invasive vertebrate remaining on the Farallones. Introduced by sailing vessels, likely in the 19th century, these mice exist on the islands in plague-like levels--at times reaching as many 1,270 mice per hectare, one of the highest observed densities in the world. The presence of invasive house mice has been demonstrated to have severe and ecosystem-altering effects on island ecosystems throughout the world. These threats include direct and indirect predation on native species, competition with native species for food resources, facilitating the spread of non-native vegetation, and damage to habitat character. On the Farallones, Ashy Storm-petrels, other seabirds, burrowing owls, Farallon arboreal salamanders, Farallon camel crickets, and the islands' vegetation are all negatively impacted by the presence of mice. Threats to the rare and threatened Ashy Storm-petrel's declining population are of particular concern. The petrel is listed as: "Endangered" by the International Union for the Conservation of Nature's Red List of Threatened Species; a "Species of Management Concern" by the USFWS; and "Species of Special Concern" by the CA Department of Fish and Wildlife.

About fifty percent of the world's Ashy Storm-petrel population breeds on the Farallon Islands. Unfortunately, the presence of the introduced, invasive House Mice threatens this globally significant storm-petrel colony by sustaining an unnatural wintering population of predatory Burrowing Owls. The Burrowing Owl is a natural, but temporary vagrant visitor to the islands that is induced to remain on the island throughout the winter due to the high density of mice during the fall season instead of continuing its normal migration. When the mouse population crashes each winter, the owls, which are already settled in for the winter, switch to preying on storm-petrels, resulting in the deaths of hundreds of petrels each winter (see Appendix M of the FEIS and also Nur et al. 2019, see summary included below). Ashy Storm-petrels on the Farallones declined by 40% from 1972-1992, and their population has not yet recovered. More recent data demonstrates that since 2007, storm-petrel capture rates at the Farallon Islands (an index of storm-petrel abundance) have further declined by approximately 32%. Studies clearly demonstrate that owls predation, facilitated through the presence of the mice, negatively impact storm-petrel survival and are contributing to continuing population decline.

Seventeen years ago, the USFWS began a thorough review of available options to remove mice from the island. Then, in 2019, the Service published one of the most thorough and scientifically rigorous Environmental Impact Statements on record, extensively referencing original, peer-reviewed science by Point Blue. The final product represents over a decade of

careful study, with a final report of 322 pages supported by an appendix 577 pages long. Before publishing the final EIS document, USFWS reviewed each of the 553 public comments that were made on the draft EIS and addressed all substantive comments in its final report.

According to the Services FEIS document, “"The purpose of this project is to meet the Service's management goal of eradicating invasive house mice from the Farallon Islands National Wildlife Refuge in order to eliminate their negative impacts on the native ecosystem of the South Farallon Islands,” with eradication defined as 100% removal 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. Although the service reviewed 49 potential mouse removal methods in its EIS, there is only one known method that has proven effective for island eradications, and that is the “preferred alternative” identified by the Service: an aerial broadcast of the rodenticide Brodifacoum.

Invasive rodent removals have been successfully completed on nearly 700 islands worldwide, including on California’s Anacapa Island in the Channel Islands National Park, three National Wildlife Refuges in the Pacific, two islands off the coast of Mexico, many islands off the main islands of New Zealand, and recently, multiple islands in the Galápagos Archipelago. House mice specifically have been successfully eradicated 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.

Wildlife managers face difficult decisions on a regular basis on how to manage sensitive areas for optimum ecosystem health. They must weigh the long-term benefits of ecosystem restoration with any potential short-term, temporary, adverse impacts of the management action. As the organization that has been primarily responsible for monitoring and providing stewardship to the Farallones for the last 50 years, Point Blue is acutely aware of the risks this project entails as well as the large ecosystem benefits it will provide. Based on our fifty years of experience studying birds and other wildlife on the islands, and the results of the extensive research done in preparation for this project, we strongly believe that this is the correct and necessary course of action to restore the islands and provide island wildlife with the resilience to adapt to future threats. We have extensively reviewed and support the conclusions of the Service’s EIS. They have identified a suite of precautionary actions they will pursue if the project is implemented to ensure that any exposure to the rodenticide by other species is kept to an absolute minimum.

The Farallon Islands are a world-famous local treasure. The Service has a unique opportunity in this moment to take a giant step forward in restoring the island’s fragile ecosystem and protecting the many species that rely on it. The time to act is now. Delaying

Point Blue

the removal of mice presents a very real risk to island populations,and may deny petrels and other island wildlife the resilience necessary to adapt to future climate impacts or stochastic events (e.g. large oil spill). We applaud the Service for their careful, transparent process and their commitment to science-based decision making and strongly encourage the California Coastal Commission to approve the consistency determination.

For reference, please see the following summaries of original Point Blue science that has been done to help inform this process:

- “Projecting impacts of mortality events on a Western Gull population”
- “Non-lethal hazing can protect gulls from exposure to rodenticide”
- “Removing invasive mice will benefit storm-petrels through reduced owl predation”

Signed,
Dr. Jaime Jahncke
California Current Group Director, Point Blue Conservation Science

Pete Warzybok
Farallon Islands Program Leader, Point Blue Conservation Science

Point Blue Publication Brief

Projecting impacts of mortality events on a Western Gull population

Nadav Nur
nnur@pointblue.org

We present a case-study of the potential impacts of a one-time mortality event on Western gulls (*Larus occidentalis*), potentially resulting from exposure to rodenticide directed at eradicating house mice at the Farallon Islands National Wildlife Refuge.

Using Point Blue's long-term datasets, we conducted a population viability analysis (PVA) to model future population trends while specifically accounting for stochastic variation in demographic parameters driven by environmental conditions.

We first modeled population trends under three environmental scenarios defined by the probability of future breeding failure: "optimistic" (no failure), "realistic" (long-term average failure rate), and "pessimistic" (increased frequency as in recent years).

Assuming no additional mortality, under "optimistic" scenario, our model predicted that the population would grow by 12.4% after 20 years. The population is expected to decline by 6.6% under "realistic" scenario; and decline by 26% under the "pessimistic" scenario.

Secondly, we assessed the potential impacts of a one-time mortality event by re-running the PVA with varying levels of additional mortality to determine the maximum level that would yield population trends indistinguishable from trends in the absence of the eradication project (≥ 95% overlap in expected population outcomes after 20 years).

The models suggest that a mortality event of up to 3.3% of the population under the "realistic" scenario, 2.8% in the "optimistic" scenario, or 4.2% in the "pessimistic" scenario would be unlikely to alter projected population trends. These results demonstrate that the greater the stochastic variation, the greater the mortality event must be to be able to discriminate a long-term effect against the backdrop of environmental variability. Note that these values do not represent any actual estimate of anticipated mortality but rather provide a threshold of detectability to evaluate potential mortality events.

Main Points

- Gull population trends are dependent on environmental conditions and likelihood of breeding failure.
- Additional mortality up to 3.3% of the population would not significantly alter existing trends.
- It is critical to incorporate stochasticity into population models to realistically project future trends.

Nur, N., Bradley, R.W., Lee, D.E., Warzybok, P., Jahncke, J. 2019. Projecting long-term impacts of mortality events on vertebrates: Incorporating stochasticity in population assessment. *Journal of Environmental Management*. (in review)

Point Blue Publication Brief

Non-lethal hazing can protect gulls from exposure to rodenticide

Pete Warzybok
pwarzybok@pointblue.org

Introduced house mice pose a threat to the ashy storm-petrel and other native species on the Farallon National Wildlife Refuge. The US Fish and Wildlife Service, which manages the Refuge, is considering mouse eradication to help restore the island ecosystem and conserve native species. Eradication methods being considered include the application of bait pellets containing a rodenticide, which may pose a risk to non-target wildlife such as western gulls.

During a trial conducted on the islands in 2012, Point Blue, Island Conservation and the USFWS assessed the effectiveness of various non-lethal hazing techniques for temporarily keeping gulls off the island, thus reducing the risk to gulls from exposure to rodenticide. Hazing methods tested included biosonics (devices which broadcast distress or alarm calls), pyrotechnics, lasers, reflective objects, effigies and helicopters.

Coordinated hazing efforts reduced gulls from a few thousand to a few hundred present on the islands, while having relatively minor impacts on other species.

Lasers, effigies and methods that combined auditory and visual stimulus, such as pyrotechnics, were the most effective at reducing gull numbers. Stationary objects such as reflective tape and kites were not effective. Biosonics were intermediate in their effectiveness but worked best in combination with other methods.

These results provide guidance for planning the mouse eradication on the Farallon Islands while mitigating potential risks to other wildlife species.

Main Points

- Introduced mice threaten the Farallon Island ecosystem.
- Western gulls would be at risk of exposure to rodenticide during proposed mouse eradication efforts.
- Hazing can reduce gull numbers present on the island and lessen the chances of exposure to rodenticide.

Warzybok, Bradley, Grout, Griffiths, Pott, Vickers, Milsaps and McChesney. 2013. Evaluating the use of non-lethal hazing techniques to minimize potential exposure of western gulls to rodenticide from a proposed rodent eradication on the South Farallon Islands. **Unpublished report to the Oiled Wildlife Care Network**. Point Blue Contribution Number 1968.

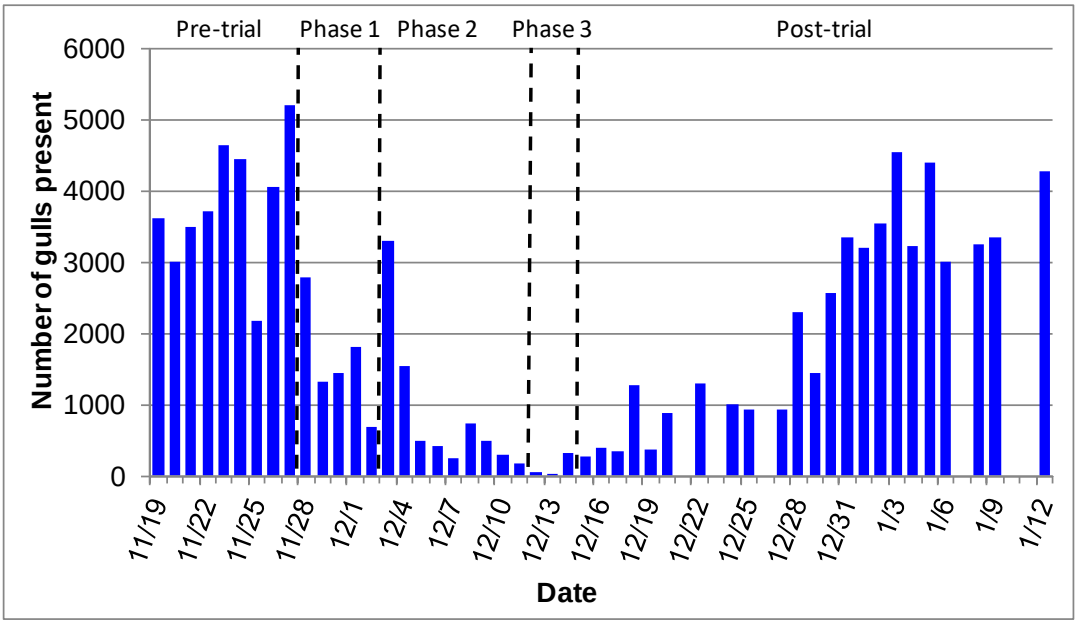

Figure 1. Maximum number of gulls present at dawn throughout the course of the hazing trial. The dashed vertical lines delineate the different phases of the trial. Individual hazing treatments were tested during phase 1. Full island active hazing efforts occurred during phase 2. Phase 3 consisted of reduced efforts to maintain low numbers.

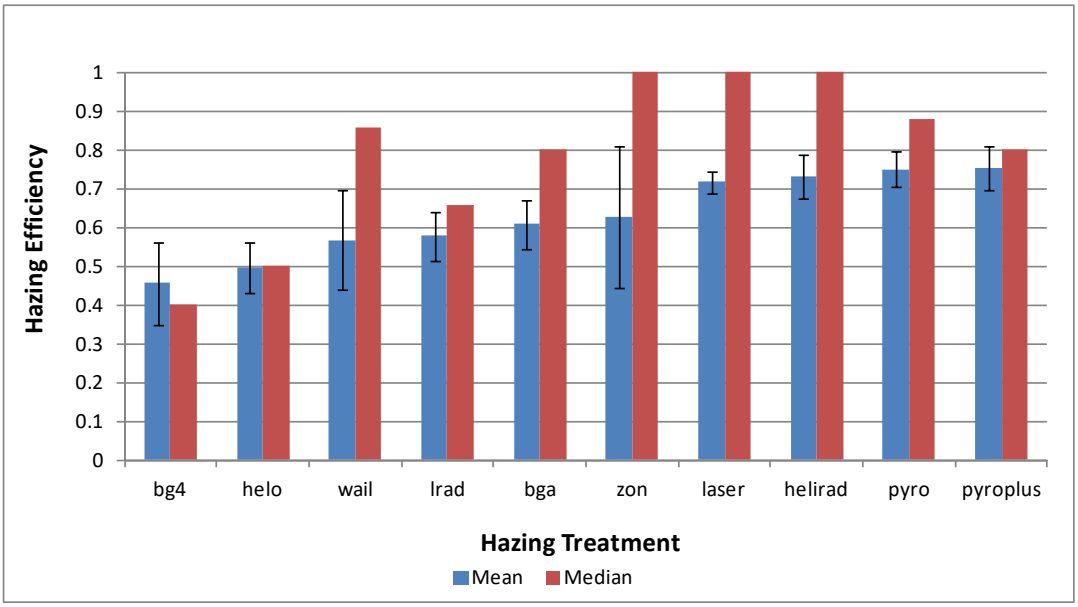

Figure 2. Mean (±standard error) and median hazing efficiency by hazing method. Hazing efficiency is defined as the proportion of gulls that departed the area in response to hazing. Different hazing methods include biosonics (bg4, wail, lrad, bga and zon), pyrotechnics (pyro), laser, helicopter (helo), helicopter in combination with biosonics (helirad) and pyrotechnics in combination with other methods (pyroplus).

Point Blue Publication Brief

Removing invasive mice will benefit storm-petrels through reduced owl predation

Nadav Nur
nnur@pointblue.org

We used Point Blue's long-term data to examine the complex relationship between house mice, burrowing owls, and ashy storm-petrels on the Farallon Islands National Wildlife Refuge and to provide a quantitative estimate of the anticipated benefit to ashy storm-petrels from a proposed house mouse eradication project.

Surveys by Point Blue biologists revealed a strongly seasonal pattern among the three species. Owls arrive at the refuge in the fall when mice are super-abundant as prey. But the mouse population crashes mid-winter each year due to seasonal rains and cold temperatures. This causes the owls to switch to preying upon storm-petrels which begin to return to the refuge at this time to breed. As a result, owl predation on storm-petrels is highest in late winter.

Analysis of storm-petrel capture/recapture data revealed a declining population trend in recent years and showed that annual adult survival is inversely related to owl abundance, especially during winter.

We used a population-dynamic model to estimate the change in storm-petrel population trends resulting from reductions in owl predation. Under current conditions (i.e., owl predation the same as in recent years) the storm-petrel population is expected to decline by 63% over the next 20 years. However, a 50% reduction in burrowing owl abundance (and related predation) would reduce that decline to approximately 26%, whereas a reduction of 80% would result in a stable or increasing storm-petrel population.

Reducing burrowing owl abundance, through elimination of their house mouse prey, will have a substantial and significant effect in reducing overall storm-petrel mortality and will promote stable or increasing future population trends.

Main Points

- Migrating burrowing owls remain on the Farallones for several months due to high density of mice during the fall season
- Owls switch from mice to storm-petrels as prey when mouse population crashes in winter
- Owl abundance has a significant negative impact on storm-petrel survival and population trajectory.
- Removing house mice is likely to reduce owl abundance and promote a stable or increasing storm-petrel population.

Nadav Nur, Russell W. Bradley, Leo Salas, Pete Warzybok, and Jaime Jahncke. 2019. Evaluating population impacts of predation by owls on storm petrels in relation to proposed island mouse eradication. *Ecosphere*. (In Press)

Madrone Audubon Society

DINCORPORATED

Submitted by email December 9, 2021

December 9, 2021

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

Re: Supplement - Comment – December 16, 2021, CCC meeting, Agenda Item 11 B: US Fish and Wildlife Service 2021 Draft Bait Spill Contingency Plan, Draft Non-Target Species Contingency Plan, and Draft Mitigation and Monitoring Plan (for Commission's Staff Recommendation Packet - proposed US Fish and Wildlife Service South Farallon Islands Invasive House Mouse Eradication Project)

Dear Commissioners:

Madrone Audubon Society submitted a comment in June 2021. We resubmit this comment for the upcoming Commission meeting. Our expressed position, supporting a multifaceted, low risk alternative project, continues.

Recently submitted research to the California Coastal Commission describing Indigenous history and relevance of the Farallon Islands as Islands of the Dead must be considered.

We have been aware of the mouse population on the Farallon Islands for many years. Discussion about distributing poison has been ongoing for at least 13-14 years. Our Chapter supports protection of the Ashy Storm-Petrel, but we support, instead of poison distribution the proposed multifaceted alternative, which may not be as financially lucrative for certain organizations but is the safe, contemporary and climate emergency-responsible approach to addressing mice on the Farallon Islands.

By-kill of non-target species, infiltration of this deadly poison into the food chain, and entry into marine sanctuaries and marine life are dangerous and unacceptable. We request your Commission deliberate and recommend a path that is low to no risk and does not include use of and distribution of Brodifacoum.

Sincerely,

Susan Kirks

Susan Kirks, President
Madrone Audubon Society

susankirks@sbcglobal.net, 707-241-5548

Madrone Audubon Society
INCORPORATED

Submitted by email June 21, 2021

June 20, 2021

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

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

Dear Commissioners:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Susan Kirks

Susan Kirks, President
Madrone Audubon Society

susankirks@sbcglobal.net, 707-241-5548

Farallon Islands Foundation

1298 Grizzly Peak Blvd
Berkeley, CA 94708

farallonislandsfoundation.org

Agenda Item: 11b
Consistency Determination No.: CD-0006-21
Eddie Bartley, President
Farallon Islands Foundation
IN FAVOR OF PROJECT

Dear California Coastal Commissioners,

Thank you for allowing public comment pertaining to the USFWS plan for eradicating non-native House ~~Mice~~ Mice from South Farallon Islands. The Farallon Island Foundation is highly supportive of this project. We agree with your staff recommendation of concurrence that this project should move forward.

As you are well aware, humans, primarily those visiting from the ports of San Francisco, wreaked environmental havoc on the Farallon Islands from the 1850's through the early 1970's through hunting, fishing, collection, accidently and purposefully introducing non-native species (including predators~~);~~); and by dumping of waste petroleum, chemicals and even radioactive materials. Fortunately, our government slowly began to realize the ecological value of this most unique feature and started protecting it – at great effort and expense. Today while the island is doing much better, it is still suffering from introduced House Mice who predate on sensitive and endemic species - impacts have been well documented by researchers for decades. Based on the FEIS Statement posted in March 2019 we are satisfied that USFWS is working with best available scientific techniques for a successful outcome of this project.

Farallon Islands Foundation is proud to have been a part of the 700+ successful invasive rodent species removal on islands. In every case, sensitive native species, especially birds, have subsequently flourished on those islands.

If nothing is done, ~~house~~ House ~~mice~~ Mice will continue to predate on our vulnerable seabirds and other unique species like the island's endemic salamander and cricket. It's a horrible, slow death for birds and other wildlife as you have no doubt seen on many related documentary videos.

Virtually every conservation science organization in the U.S. support the project as currently prescribed as well as your own staff. We hope that the California Coastal Commission appreciates the incredible amount of expert scientific analysis that has been invested in this plan. Thank you for your considerations to minimize negative impacts by humans on our wildlife and ecosystems. The board of the Farallon Islands Foundation plans to support this project in the future and we hope that your commission will ~~not have a negative view or determination of this project.~~ permit the project to proceed.

Eddie Bartley

December 10, 2021

Via email: john.ainsworth@coastal.ca.gov

John Ainsworth
Executive Director
California Coastal Commission
45 Fremont Street
Suite 2000
San Francisco, CA 94105

Re: Support for Farallon Islands Mouse Eradication Plan

Dear Mr. Ainsworth,

Santa Clara Valley Audubon Society (SCVAS) does not oppose the U.S. Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands. We are, however, concerned about the methods being used. Rodenticide brings with it risks to non-targeted species on the island.

That said, the negative impact of non-native pests like the house mouse on the critically small population of breeding Ashy Storm-Petrels and Leach's Storm-Petrels needs to be confronted.

While we have concerns over the potential long-term effects of using aerial broadcast of the rodenticide Brodifacoum, we support the eradication of invasive house mice from the Farallon Islands.

Thank you for your thoughtful consideration.

Sincerely,

Matthew Dodder
Executive Director
Santa Clara Valley Audubon Society

Citizens Committee to Complete the Refuge

P.O. Box 23957, San Jose, CA 95153 Tel: 650-493-5540 Email: cccrrefuge@gmail.com wwsw.bayrefuge.org

California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105-2219
Via email: farallonislands@coastal.ca.gov

December 8, 2021

Re: December 16, 2021 Agenda Item Wednesday Item Th11b-CD-0006-21
Comments in Support of the U.S. Fish and Wildlife Service South Farallon Islands Invasive House Mouse Eradication Project

Dear Commissioners,

The Citizens Committee to Complete the Refuge and its 2000 members have a decades-long history of devotion to the wetlands and wildlife of the San Francisco Bay region. The efforts of our senior members led to the establishment of the Don Edwards San Francisco Bay National Wildlife Refuge in 1972.

We strongly urge the California Coastal Commission to find the U.S. Fish and Wildlife Service's (USFWS) project to eliminate nonnative house mice on the South Farallon Islands to be fully consistent with the California Coastal Management Program. The Farallon Islands are vital to 13 species of breeding seabirds. The Ashy Storm-Petrel, a bird of Special Concern whose numbers have dropped precipitously, will especially benefit from the removal of the non-native mice. Indeed, with so many human impacts on these birds, it behooves us to do all we can to protect them.

We acknowledge that this is a controversial issue; however, other avenues of eradication have failed. We support the use of the rodenticide brodifacoum for this particular project and at this particular location, the South Farallon Islands location, for the following reasons:

- 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, as well as on native salamanders, invertebrates and native plants.

- The only way to allow the ecosystem to recover is to ensure 100% eradication of the house mice. 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 25-D Conservation) identified by the US Fish and Wildlife Service in the Final Environmental Impact Statement published in March 2019.

- This report represents thorough and scientifically rigorous EIS documents on record, and the final product represents over ten years of careful study. Before publishing the final EIS document, USFWS reviewed and addressed 553 public comments.

- Land managers have successfully eradicated house mice from more than 60 islands worldwide, including Anacapa Island in the Channel Islands National Park in California, and nearly all of these successful projects utilized techniques like that proposed for the South Farallon Islands house mouse eradication.

- The USFWS will follow best practices learned from successful eradications, and will implement the mitigation measures outlined in the final EIS to minimize any potential negative impacts of the eradication.

Thank you for the opportunity to provide comments. We urge you to support the efforts of the U.S. Fish and Wildlife Service to protect and enhance this unique island ecosystem.

Sincerely,

Florence M LaRivière

Florence LaRiviere, Chair Emeritus

Carin High

Gail Raabe

Carin High
Gail Raabe
Co-Chairs, Citizens Committee to Complete the Refuge

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
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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

December 10, 2021

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

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

Dear Commissioners,

On behalf of the Center for Biological Diversity and our 1.7 million members and activists, we offer this written testimony in support of the South Farallon Islands Invasive House Mouse Eradication Project and support of the staff recommendation of conditional concurrence for this project. This project furthers the policy objectives of both the California Coastal Management Program and the larger goals of the Coastal Zone Management Act, which seeks to restore marine and coastal ecosystems, and the wildlife populations that depend upon them.

In addition to habitat loss and over-exploitation, invasive species represent a primary threat to biodiversity and a driver of extinction. The introduction of non-native species into new environments is responsible for over 50 percent of all of the recorded animal extinctions since 1600 for which a cause could be attributed.[1] Island ecosystems and the species of plants and animals found there are inherently vulnerable to extinction, and their isolation makes them especially vulnerable to introduced species. Of the 245 recorded animal species extinctions since 1500, 75 percent were endemic species on offshore islands, and invasive species were at least partially responsible for at least 54 percent of those extinctions.[2]

The introduction and presence of invasive, non-native house mice to the Farallon Islands continues to cause significant impacts to the island's wildlife and ecosystems. House mice densities can exceed over 1000 mice per hectare, especially in the fall season.[3] This super-abundant food source attracts Burrowing Owls, which will often over-winter on the island. As the mouse population declines through the winter, these owls learn to hunt storm-petrels and switch their diets to these birds.

The Ashy Storm-petrel, which the Center for Biological Diversity previously petitioned to be protected under the Endangered Species Act, is assessed as an endangered species by the International Union for the Conservation of Nature and G2 (imperiled) by NaturServe. Predation by Burrowing Owls remains a substantial threat to the species. A single overwintering owl can kill dozens of adult storm-petrels in a single season. In addition to harming Ashy Storm-petrels,

[1] Clavero, N. and E. Garcia-Berthou. 2005. *Invasive species are a leading cause of animal extinctions.* Trends in Ecology and Evolution 20:110.
[2] Ricketts et al. 2005. *Pinpointing and preventing imminent extinctions*. Proceedings of the National Academy of Sciences, 120:18497-18501.
[3] South Farallon Islands Invasive House Mouse Eradication Project: Draft Environmental Impact Statement at 47.

house mice kill or injure other seabirds, the Farallon arboreal salamander and the endemic Farallon camel cricket. Furthermore, house mice disrupt the island's vegetation community by spreading the seeds of non-native plant species. All of these impacts negatively affect the coastal and marine environment of the Farallon Islands.

Ashy Storm-petrel wings and burrowing owl pellets, all likely from the same burrowing owl. Photo by Brett Hartl, 2004

Invasive species — including rodents — have been successfully eradicated on nearly 700 islands worldwide — 60 of which involved the eradication of house mice. The overwhelming conclusion that can be drawn from experience of these eradication efforts is that the only way to achieve complete, 100% eradication of house mice is to follow the U.S. Fish and Wildlife Service's preferred management alternative using Brodifacoum.[4]

The Farallon Island mouse eradication project is one of the most well-studied, scientifically validated and comprehensively planned projects in history, taking over 13 years to complete. While it is possible that any particular eradication project might fail, it is hard to conceive of a more rigorous process then what was completed here. We believe that the staff recommendations for independent observers of the implementation of the eradication project will help to strengthen the overall credibility of this effort, and will help demonstrate the efficacy of this effort.

We would also like to note that the Center continues to oppose the use of second-generation anti-coagulant rodenticides including brodifacoum in agricultural, non-agricultural and residential settings given the severe ecological harm that can occur to native species, including those protected by the Endangered Species act. However, the use of brodifacoum here to further a

[4] Witmer, Gary, John D. Eisemann, and Gregg Howald. *The use of rodenticides for conservation efforts*. (2007); Parkes, John, Penny Fisher, and Guy Forrester. *Diagnosing the cause of failure to eradicate introduced rodents on islands: brodifacoum versus diphacinone and method of bait delivery*. Conservation Evidence 8 (2011): 100-106; Jones, Holly P., et al. *Invasive mammal eradication on islands results in substantial conservation gain*. Proceedings of the National Academy of Sciences 113.15 (2016): 4033-4038; Capizzi, Dario. *A review of mammal eradications on Mediterranean islands.* Mammal Review 50.2 (2020): 124-135; Howald, Gregg, et al. *Invasive rodent eradication on islands.* Conservation biology 21.5 (2007): 1258-1268.

vitally important conservation objective by highly trained professions in an exceptionally well-controlled setting is appropriate given the lack of other options that have a high likelihood of success. Securing the conservation status and potentially preventing extinction warrants the use of this pesticide here in this instance.

The United States and the world face an unprecedented extinction crisis. In 2019, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) warned in a landmark global assessment that already "one million species already face extinction, many within decades, unless action is taken to reduce the intensity of drivers to biodiversity loss."[5] The Farallon Islands eradication house mouse eradication will help secure the future of several endemic and imperiled species in the larger effort to stem the extinction crisis, and we urge the commission to support the consistency determination.

Sincerely,

Brett Hartl
Government Affairs Director
Center for Biological Diversity

[5] S. Diaz, J. Settele, E. Brondizio. 2019. Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.

December 10, 2021
California Coastal Commission
Re: Farallon Island Restoration

Dear Commissioners,

We are 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, 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' numerous breeding seabird species, especially Ashy Storm-Petrels and Leach's Storm-Petrels, as well as on native salamanders, crickets and other invertebrates, and native plants.

The only way this ecosystem can 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.

Protecting the many seabirds that use the Farallon Islands is vitally important to our 1,200 Monterey Audubon chapter members, and likely important to many more people whose income is dependent on the ocean or who find inherent value in a healthy marine environment. The multitude of marine organisms, be they the tiny storm-petrels or enormous Blue Whales, have critical functions to perform in the ocean ecosystem, our giant earth engine. We must support them by restoring this critical island habitat.

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

Sincerely,

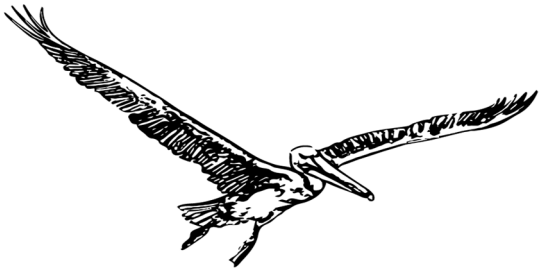
Blake Matheson
President
Monterey Audubon Society

Paul Fenwick

Paul Fenwick
Vice President, Seawatch coordinator
Monterey Audubon Society

Amanda Preece, M.S.
Environmental Advocate
Monterey Audubon Society

Remaining governing board: Robert Horn, Jan Scott, Shawn Wagoner, Kenneth Skolnik, Jan Loomis, Fred Hochstaedter



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

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[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.

California Coastal Commission
Attn: Jack Ainsworth 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; larry.simon@coastal.ca.gov; farallonislands@coastal.ca.gov; Kate.Huckelbridge@coastal.ca.gov; Cassidy.Teufel@coastal.ca.gov;

Re: DENY Federal Consistency Determination of U.S. Fish and Wildlife Service for South Farallon Islands Invasive House Mouse Eradication Project, Greater Farallones National Marine Sanctuary

Dear Commissioners:

The undersigned organizations, collectively representing the grassroots and intergovernmental movement that led to the multiple layers of state, federal, and international recognition for the wildlife and environmental resources surrounding the Farallon Islands, are writing to hereby respectfully request that the Coastal Commission **deny** a finding of consistency to the proposed helicopter dispersal of a highly-toxic and systemic poison, known to have dangerous ecosystem impacts to non-target species, onto the Farallones. The adverse impacts of the "bykill" from this project can be anticipated to extend to the random distribution of hazardous contaminated carcasses

of gulls along the mainland coast, according to the EPA. The health of the food chain of so many species of wildlife along our coast is not worth the risks posed by this poorly-planned proposal.

The Farallones are the epicenter of one of the most hard-won and comprehensively-protected places on Earth. The strong conservation movement in our region led to the 1908 designation of Muir Woods National Monument, the first such protected area in Marin County. The 1962 creation of Point Reyes National Seashore, followed by the 1972 designation of the Golden Gate National Recreation Area, were precursors to the groundswell of effort leading to the 1981 designation of the original Farallon Islands National Marine Sanctuary, now the Greater Farallones National Marine Sanctuary, to surround the Farallones National Wildlife Refuge. The additional 2010 protection of the Farallones within a California Marine Reserve, created under the state's Marine Life Protection Act, further enhanced the protection of these waters. Each of these layers of protection was supported in bipartisan fashion by our Members of Congress, by our Governors, by our local officials, and by millions of citizen activists who worked tirelessly for decades. An International Biosphere Reserve, created by UNESCO, further recognized the unique ecological values here in the global context. Against this historic backdrop, the California Coastal Act also had much of its genesis in our region, and we rely on the diligent administration of the Coastal Act to provide yet one more layer of necessary protection for this unparalleled national treasure.

Quite simply, the above described constellation of protected areas is not the appropriate place for the U.S. Fish and Wildlife Service to conduct an experiment of a type that has failed, with devastating results to wildlife and the environment, in so many places throughout the world. The cost-benefit ratio associated with the random distribution of the second-generation rat poison Brodifacoum, which has proven so harmful to all animals and so damaging to the food chain that a moratorium on its use has been implemented throughout California, carried by avian predators away from the islands as toxic body burden to the mainland coast and beyond, clearly does not justify the known risks involved.

We are aware that the proposed Farallones "drop" is but the first of many planned elsewhere, with others to follow off the California coast if this dangerous precedent is mistakenly allowed here. The precedent of misapplication of our own Coastal Act to condone this kind of damage to our coast would sadly fail those who came before us and would not be remembered well by future generations.

Commissioners, in their task to protect California's coastal resources, asked many poignant questions about the proposed project at the July 2019 hearing. USFWS failed to provide adequate response at that time or since that hearing. Without a clear plan to address what unanticipated level of non-target mortality would stop the project, and with what tools first-responders might attempt to utilize to try to clean up any accidental poison spill into the ocean or on land at the Southeast Farallon Island, this project should not go forward. In addition, less dangerous and more targeted and species-specific ways to get rid of the mice on the Farallones, such as using non-toxic contraceptive baits already being licensed by the EPA with **none** of the threats of bio-magnification while avoiding the wholesale killing of non-target species, do exist and merit a supplemental EIS before determination of Federal Consistency.

Commissioners are also asked to recognize the Indigenous history of the Farallon Islands and only support a project that would honor the Islands' complete history, proceed with Tribal consultation and also protect multiple, exceptionally sensitive species without unnecessary deaths or further impacts during an existing local and global Climate Crisis.

(Th11b CD-0006-21)

The USFWS proposal is not appropriate for the Farallon Islands. Please DENY consistency of the USFWS experimental Mouse Eradication Project utilizing the aerial dispersal of 1.5 tons of toxic Brodifacoum pellets at the Farallones and instead require that a supplemental EIS to evaluate less harmful alternatives be conducted by an independent body without present or future financial interests.

Thank you for your continued service and dedication to the protection of the marine environment and California Coast.

Sincerely,

Richard Charter
Coastal Coordination Program
The Ocean Foundation

Brandon Dawson
Executive Director
Sierra Club California

Nancy B McKenney, MNPL, CAWA
CEO/President
Marin Humane

Richard Ogg
Board of Directors
Bodega Bay Community Fisherman's Association

Susan Kirks
President
Madrone Audubon Society

Sara Wan
Co-Founder
Western Alliance for Nature

Michael Allen
Board of Directors
Sonoma County Conservation Action

Pamela Flick
California Program Director
Defenders of Wildlife

Mark J. Palmer
Associate Director
International Marine Mammal Project of Earth Island Institute

Cea Higgins
Co-Founder
Save the Sonoma Coast

Lou-Anne Fauteck Makes-Marks, MA, MFA, PhD
Director
Sacred America

Frank Egger
President
North Coast Rivers Alliance

Susan Kegley, PhD
Principal Scientist and CEO
Pesticide Research Institute, Inc.

Lindsey Zehel, Esq., LL.M.
Executive Director
Defend Them All Foundation

Kian Schulman RN, MSN
Executive Director
Poison Free Malibu

Padi Selwyn
Co-Chair
Preserve Rural Sonoma County

Jenna Valente
Director of Advocacy
Healthy Ocean Coalition

Melanie Schlotterbeck
Outreach and Policy Coordinator
Friends of Harbors, Beaches and Parks

Lisa Owens-Viani
Director
Raptors Are The Solution

Drew Toher
Community Resource and Policy Director
Beyond Pesticides

Allison Hermance
Director of Communications & Marketing
Wildcare

Brenda Adelman
Chair of Board
Russian River Water Protection Committee

Dee Swanhuyser
Co-Chair
Rural Alliance

Larry Hanson
President
California River Watch

Janus Holt Matthes
Board Member
Wine & Water Watch

Megan Kaun
Director
Safe Agriculture Safe Schools

Merlin Kolb
Owner/Operator
Reel Magic Sport Fishing Charters

Jack Eidt
Co-Founder,
SoCal 350 Climate Action

Penny Elia
Save Hobo Aliso Task Force

Margaret Briare
President
Bodega Bay Concerned Citizens

Tom Roth
Coastal Advocate

Mary McAllister
Webmaster
Conservation and Nonsense Blog

Maggie Sergio
Environmentalist, Writer

Lorne Edwards
Principle Officer
Bodega Bay Fisherman's Marketing Association

Dr. Kathleen Burns
Director
Sciencecorps Manchester by the Sea, MA

M. Kraemer Winslow
Former Chair, Marin County IPM Commission

Lisa Levinson
Campaigns Director
In Defense of Animals

Ginger Souders-Mason
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Pesticide Free Zone

Laura Chariton, M.A
Executive Director/Founder
Watershed Alliance of Marin

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Oceans & Vessels Program Director
Friends of Earth

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Hands Across the Sand

Jack Gescheidt
Founder
The Tree Spirit Project

Anastasia Glikschtern
Board of Directors, Treasurer
San Francisco Forest Alliance

Eric Brooks
Executive Director
Our City San Francisco

Rene Aiu
Chief Representative
Harbor & Beach Community Alliance

Deborah Moskowitz
President
Resource Renewal Institute

Barbara Bogard
2019 Marin County IPM Achievement Award

Cal Ares
President Board of Directors
Jenner Community Club

Judi Shils
Founder/Executive Director
Turning Green

Judy Schriebman
Board Secretary & Founding Member
Gallinas Watershed Council

Janet Bridgers
Co-Founder/President
Earth Alert!

Michael Cooley
Owner/Operator
Native Fish Company

Sarah Bates
Treasurer
Crab Boat Owners Association

Frank Sousa Jr
Board of Directors
Half Moon Bay Seafood Marketing Association

Rika Gopinath
Chair
Yard Smart Marin

Vanessa Handy
Co-Chair
Moms Advocating Sustainability

Nan Wishner
Board Member
California Environmental Health Initiative

Nancy Okada
President
Sustainable Ross Valley

Mary Jane Schramm ~ Journalist, Naturalist
250 San Felipe Way, Novato, CA ~ maryjane.schramm@gmail.com

December 9, 2021

California Coastal Commission

Re: TH 11b - Farallon Islands NWR mouse eradication plan - testimony

Good day, Commissioners,

I am writing in support of a consistency determination for the US Fish and Wildlife Service (FWS) plan to restore the Farallon Islands by removing invasive house mice.

For 20 years, until my recent retirement, I was Public Information Manager for NOAA's Greater Farallones National Marine Sanctuary surrounding the Farallon Islands National Wildlife Refuge. Though speaking as a private individual now, I draw on nearly 14 years' familiarity with this issue, through presentations and discussions by experts and advocates, pro and con. The FWS plan is based on sound science, and is the only feasible and permanent solution to the mouse problem.

My voice is just one of many that bring facts and a balanced perspective to the issue. The FWS plan, with its many safeguards and refinements, has been examined and received the endorsement of such reputable organizations as:

> ***National Audubon Society - Marin Audubon Society and several affiliate chapters - Greater Farallones Association - the Oceanic Society - California Academy of Sciences - Nature Conservancy - Institute for Bird Populations - International Bird Rescue - Pacific Seabird Group - California Audubon Society - Save our Shores - Point Blue Conservation Science - Island Conservation - National Fish & Wildlife Foundation - Save our Shores - Save the Bay*** ... and others.

Be assured, as these organizations have been, that the plan's use of poison was not arrived at lightly; rodenticides have too often been abused on the mainland, but the application on these islands will be done in a highly controlled way. The use of contraceptives has been dismissed as ineffectual, as the drug is not even designed to remove all the highly prolific rodents from the islands, thus they remain a problem in perpetuity; and is still years away from any potential use. Noting these facts, the above supporters concur with FWS that rodenticide is the only method to use.

The mice prey on wildlife and native plants, and attract owls which do further depredation to island species. Climate change and other anthropogenic impacts have already compromised the marine ecosystem, including the islands and surrounding waters. Scientists have documented recent massive seabird and marine mammal die-offs in Greater Farallones and Monterey Bay marine sanctuary waters during the 2014-16 marine heat wave, and we've lost 95% of our kelp forests. Clearly, we can't predict what the next event will be, ***but we can prepare for it by building ecosystem resilience now.*** It's morally right, and scientifically sound policy to remove barriers to ecosystem balance that are within our power. These mice represent a key threat to several species, and create an imbalance on these islands *that we can eliminate***.**

Recently there was a 49% decline in the Farallones' Ashy Storm-petrel population in just 12 years; decisive action is needed to halt this process. **COP-26 has taught that *delay* is deadly**, and time is not on our side. This rare, IUCN endangered seabird cannot be allowed to slide past it's tipping point into extinction.

The US Fish & Wildlife service plan gives these seabirds, the endemic island salamanders and the unique plant life of the Farallones new hope for survival. Please enter a consistency determination, so this important work may soon become a reality.

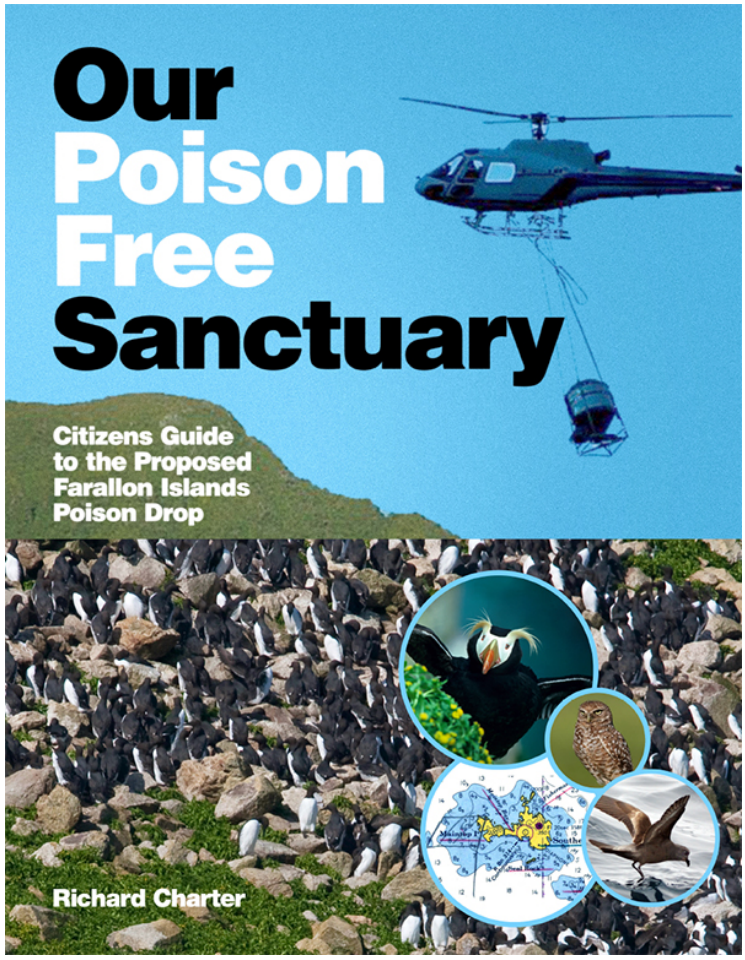
Sincerely,

Mary Jane Schramm
Novato, CA

Our Poison Free Sanctuary

Citizens Guide to the Proposed Farallon Islands Poison Drop

Richard Charter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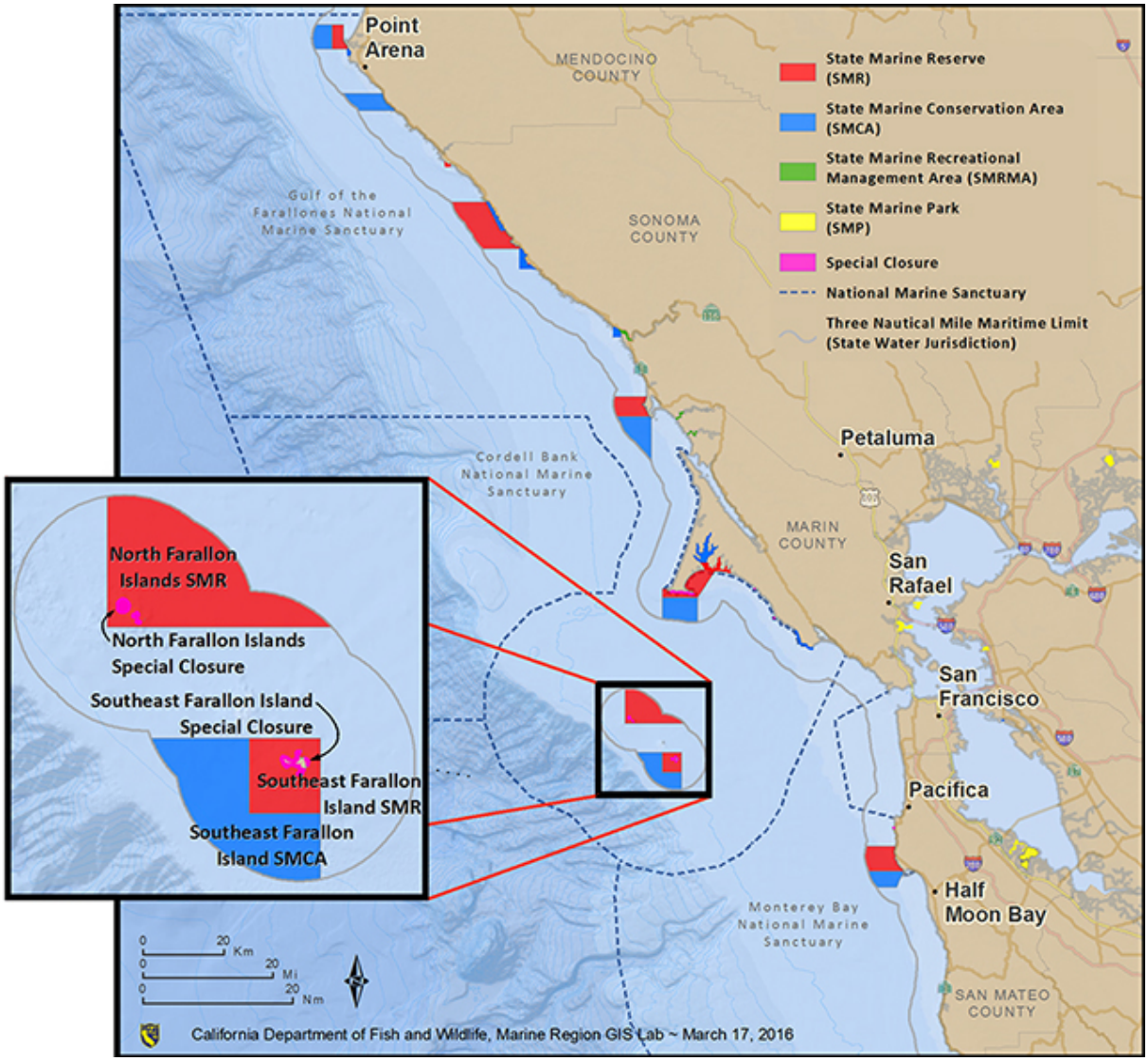

Point Arena
MENDOCINO COUNTY
SONOMA COUNTY
MARIN COUNTY
Gulf of the Farallones National Marine Sanctuary
Cordell Bank National Marine Sanctuary
Monterey Bay National Marine Sanctuary
SAN MATEO COUNTY
Petaluma
San Rafael
San Francisco
Pacifica
Half Moon Bay
State Marine Reserve (SMR)
State Marine Conservation Area (SMCA)
State Marine Recreational Management Area (SMRMA)
State Marine Park (SMP)
Special Closure
National Marine Sanctuary
Three Nautical Mile Maritime Limit (State Water Jurisdiction)
North Farallon Islands SMR
North Farallon Islands Special Closure
Southeast Farallon Island Special Closure
Southeast Farallon Island SMR
Southeast Farallon Island SMCA
0 20 Km
0 20 Mi
0 20 Nm
California Department of Fish and Wildlife, Marine Region GIS Lab ~ March 17, 2016

A Special Sanctuary

The Farallon Islands, often visible 28 miles from San Francisco's Golden Gate, host the largest seabird colony in the lower-48 states. Known as "California's Galapagos", these islands are home to an estimated 250,000 seabirds, representing 13 species in prolific breeding colonies. The islands also provide safe shoreline haulouts for countless marine mammals.

The lush ocean waters surrounding the Farallones boast some of the region's most productive fishing grounds and are teeming with Great White Sharks and multiple species of whales. All of these species are protected within the Greater Farallones National Marine Sanctuary and two of California's iconic State Marine Protected Areas.

No Place for Deadly Poisons

Here, the U.S. Fish and Wildlife Service is proposing to use helicopters to release one and a half tons of toxic rodenticide bait laced with a deadly wildlife poison to try to eliminate a few protected Burrowing Owls in the hope of benefitting a small seabird known as the Ashy Storm Petrel. The Wildlife Service is pursuing the unproven theory that if it could kill every mouse on the Southeast Farallon Island, these Burrowing Owls might no longer be attracted to this spot. This particular poison is so harmful to all animals and so damaging to the food chain, that a moratorium on its use has been implemented throughout California until the state can reevaluate it. Carpet-bombing the Farallones' ecosystem with a broad-spectrum wildlife poison will threaten one of the most sensitive food chains on our planet.

Burrowing Owl

The Problem:
An Average of Eight Burrowing Owls

The U.S. Fish and Wildlife Service's misguided project proposes to try to completely eradicate invasive house mice from the Southeast Farallon Island. It is thought that the mice were introduced by European explorers as early as the late 1500s, or else they were accidentally brought by Russian fur traders sometime in the 1800s.

During the fall months of most years, a seasonal overpopulation of these mice on the island attracts, on average, eight Burrowing Owls that fly over from the nearby Marin County coastline to prey on the mice. But as the temporary seasonal spike in the mouse population naturally subsides, a few Burrowing Owls linger on the Southeast Farallon Island. These remaining owls can then prey on a small seabird called the Ashy Storm Petrel.

While the Farallones are a breeding and habitat area for the Ashy Storm Petrels, the very same U.S. Fish and Wildlife Service has ironically twice rejected this population as a candidate for stronger protection under the Endangered Species Act. Both times, this petrel's natural population variation has been cited by this agency as a rationale for their repeated denial of any additional protection. It is entirely possible that the Burrowing Owls may have always come out to this nearshore island, even prior to the probable human introduction of the mice so long ago. Therefore, no one can predict whether or not the owls might still continue to arrive, even without the mice.

Yet it's a matter of record that Brodifacoum, the poison selected for this experiment, has a tendency to move insidiously throughout seabird colonies; harming raptors, owls, and other avian predators.

Ashy Storm Petrel

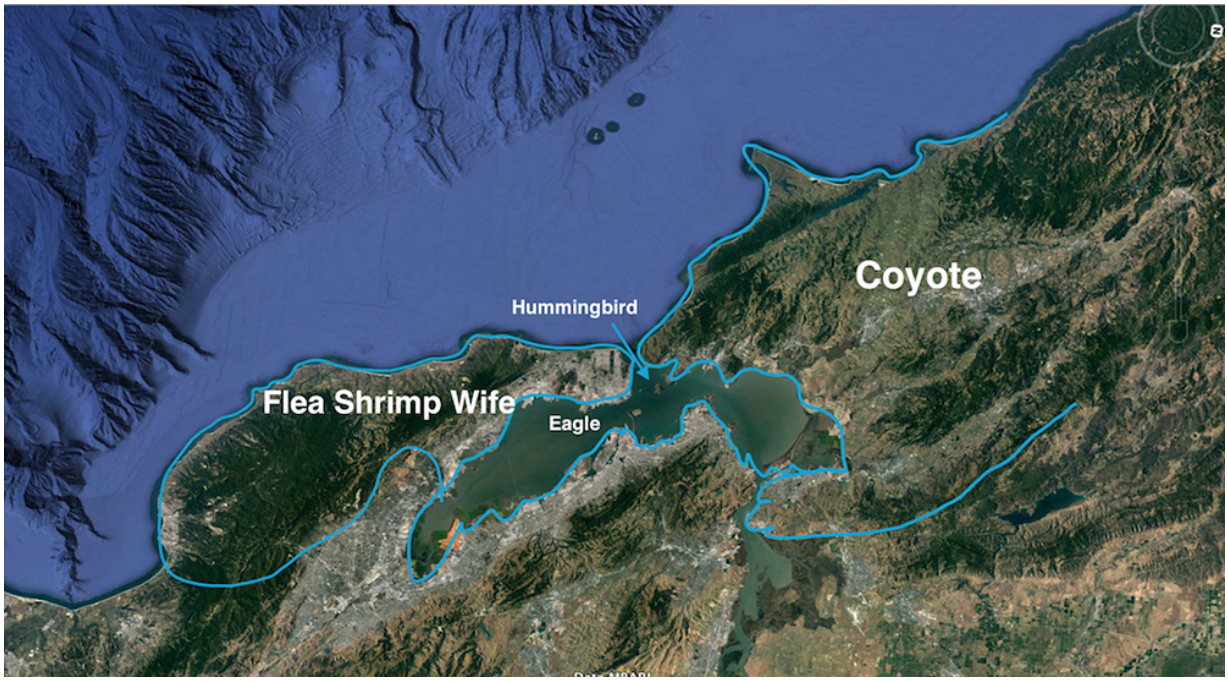
Ashy Storm Petrels are also found on Southern California's San Miguel and Santa Barbara Islands, where recreational kayakers have been known to unintentionally cause nest abandonment when entering sea caves. Throughout their habitat, the threats proven most dangerous to Ashy Storm Petrels are posed by floating oil spills, eggshell thinning with various causes, ingesting marine contaminants and plastics, and the sometimes-fatal propensity of this species to become disoriented while feeding at night by the bright lights on boats, offshore oil drilling rigs, and also likely by similar lights on future commercial offshore wind electrical generation arrays. Precluding offshore drilling rigs while preventing marine oil spills in the vicinity of the Farallones were two of the primary reasons for the 1970's citizens movement to secure the initial designation of the Greater Farallones National Marine

Sanctuary, thus benefitting the petrels there. Burrowing Owls, which are protected under the Migratory Bird Treaty Act, are also the focus of conservation efforts by many parties, primarily due to population challenges posed by loss of much of their favored habitat on the mainland to development and agriculture.

Sacred Ground:
The Original Tribal Ancestors

The Farallon Islands have been integral to the cosmology and traditions of the Ohlone People for over 6,000 years. Traditionally, the Farallones are known as the *Islands of the Dead.*

The ancient stories of the Ohlone reflect the mythic characters of Coyote, Eagle (or Condor), Hummingbird, and Coyote's Flea (or Shrimp) Wife, and these stories are still embedded in the landscape of this place. The Farallon Islands are part of the immense geomorphic theophany and mortuary complex of the West Berkeley Shellmound, together with the lands and waters of the greater San Francisco Bay Area. Marin County is viewed as the giant head of Coyote, whose body spreads northward along the coast and over the North Bay. The San Francisco Peninsula is Coyote's Flea Wife or Shrimp Wife. The San Francisco Bay is Eagle or Condor, with wings outstretched. The West Berkeley Shellmound is a cremation mound and portal for the dead, at the midpoint of the Eagle's tail. The beak of the Eagle points west through the Ohlone's Western Gate, now the Golden Gate. A straight sightline runs from the West Berkeley Shellmound, up the middle Eagle's body, and outward through the Golden Gate to the Farallones. It has been believed that after death, the spirits of the Ohlone would first travel to what was known as Pelican Island (now Alcatraz), where they remained for four days. Following cremation or burial, they flew west to the Farallones on that straight line, carried by Eagle. Today, the Farallon Islands are still considered to be the home of the Ohlone ancestral spirits.



The West Berkeley Shellmound was named as a City Landmark by the City of Berkeley, is on the State of California's Register of Historic Resources, and is on the 2020 roster of America's Most Endangered Historic Places identified by the National Trust for Historic Preservation. This entire **complex** is more ancient than Stonehenge, and it is an American treasure.

The Ohlone's neighboring Tribe to the north, the Coast Miwok, also knew that they lived on the body of the Coyote landform, and the spirits of their dead migrated southward from Point Reyes on a trail of seafoam, likely to the Farallones.

To date, the sacred aspects of the Farallon Islands as traditional cultural landscapes have not been adequately evaluated during the institutional consideration of the U.S. Fish and Wildlife poisoning proposal. Both the Ohlone and Coast Miwok have thus far been disenfranchised in the planning process for the poisoning, leaving important *Traditional Ecological Knowledge,* in the context of eco-cultural considerations, missing from the decision-making process. In this framework, the proposed Farallones poisoning by a federal agency represents a continuation of longstanding colonial imposition

on the affected Tribes, given that the pending agency decisions, questionable private funding sources, biased federal documents, and the flawed project planning have been formulated largely absent Indigenous consultation and consent.

Just Coming Back:
Recovery to Date from Historic Take of Wildlife

Seeking food for their ship's crew, the first European sailors to row a longboat ashore at the Farallones appear to have arrived no earlier than the late 1500s, to hunt seals and gather seabird eggs. This earliest recorded landfall may have possibly resulted in the initial introduction of house mice, although a genetic analysis of the Farallones mice seems to indicate a strain with origins in Russia, which tends to point to their more recent introduction via Russian fur traders during the 1800s. The Russians also took eggs, as well as dried seabird carcasses for food. Since many of the living resources at the Farallones have been subject to a challenging history of extractive abuse, the wildlife there has taken many decades to slowly recover to current levels.

"The Eggers"

Starting during the Gold Rush era, seabird egg harvesters called “Eggers” removed as many as 14 million Common Murre eggs from the Farallones, at first to sell to miners in the Sierras and then to restaurants in San Francisco for as much as a dollar per egg. The egg hunters first went onto the islands to smash the eggs in every nest they could find as an assurance that the ones they would later return to gather up for sale would be as fresh as possible. Western Gull eggs were also marketed during this period, but these were considered less desirable than those from the Murres. Seabird eggs are said to have been sold by the children of certain historic Farallones lighthouse keepers to satisfy a fad that generated an artificial demand created by collectors seeking to possess one egg from every species in their personal collections. Sometimes other seabird eggs were even disguised as Ashy Storm Petrel eggs because those were particularly valuable to collectors. Virtually every species of marine mammal was also hunted ruthlessly during several different eras, to meet the demand for food and fur. Salted Sea Lion meat and Northern Fur Seal pelts were major commodities derived from Farallones wildlife. Meanwhile, the region’s population of California Sea Otters was driven to near extinction in the quest for their unique pelts. Local Sea Otter populations around the Farallones have still not recovered.

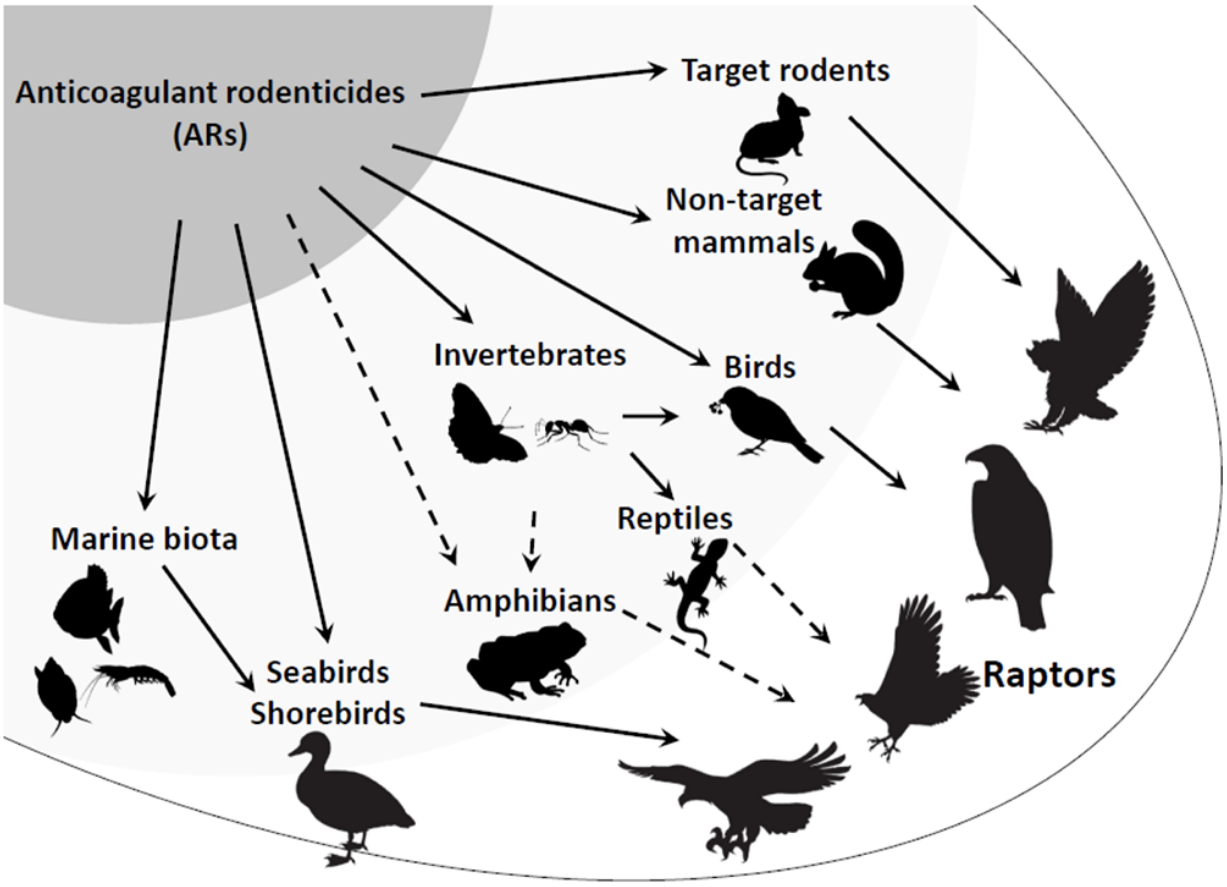
The Eradication Game:
Unnecessary Mortality of Harmless Wildlife

Throughout the world's oceans, most of the more remote island habitats have long been colonized by seabirds attracted by an abundance of food in surrounding waters and the accompanying lack of native predators. The subsequent arrival of humans to these seabird islands has often brought the inadvertent introduction of mammalian predators of many kinds, elsewhere comprised most commonly of shipboard rats, for which strychnine poison originally served humans as the early rodenticide of choice. The chemical methods for the control of rodents have since escalated. The pest control industry has continually amplified the killing power of its products, while seeking a *single feed* strategy that can enable one single feeding of poison to eventually kill anything consuming the bait, even though that death may come slowly.

Unfortunately, the *second-generation* anticoagulant rodenticide (SGAR) compound chosen for the proposed Farallones mouse eradication, Brodifacoum, is extremely toxic to most other living organisms that consume the bait. Brodifacoum will inevitably induce the slow secondary poisoning of any gull, raptor, or other species that consumes dead or dying poisoned mice, or else preys on any of the other non-target animals that have been subjected to the bait.

The biochemical mechanism by which a second-generation anticoagulant rodenticide like Brodifacoum acts is as ingenious as it is slow and tortuous, in terms of the physiological symptoms experienced by its victim. By inhibiting an animal's blood clotting mechanism, this type of poison exposure results in the animal slowly bleeding to death internally over a protracted period of time. The prolonged process of death by the gradual internal bleeding can take up to two weeks, depending on the dosage acquired and the species

of animal exposed. Severe dehydration inevitably accompanies this internal bleeding.



While island poisoning proponents often rationalize that any misplaced invasive rodent simply represents a pest to be killed by any means available, a similar philosophical justification cannot legitimately be applied to non-target bykill of species that are unfortunate enough to share the same habitat and food chain as the targeted pest. Poisoned rodents themselves quickly become attractive prey for avian predators as they slowly die, with Brodifacoum concentrations in the liver serving as one of the main bioconcentration pathways by which these poisons are inevitably conveyed to harmless non-target species. For the Farallones, the seasonal timing of the proposed poison application unfortunately coincides with the annual autumn *Golden Gate Raptor Migration*, during which many majestic birds of prey may well be attracted to the island by the ready availability of an impaired prey species like

dying mice. Fur seal pupping season at the Farallones also extends into September, putting another sensitive life stage in this fragile ecosystem at risk.

Due to its adverse impact on entire ecosystems, Brodifacoum poison has been banned from retail sale in California since 2014 and, effective as of January 1, 2021, the State Legislature and Governor Gavin Newsom, by way of new legislation in the form of AB 1788, have placed a statewide moratorium on the use of this compound, and others like it, until a full evaluation of its impacts can be completed. Certain exemptions in California's AB 1788 mean that it does not similarly halt the use of Brodifacoum on offshore islands, although this law became necessary because of its association with the observed ongoing destruction of wildlife throughout North America.

This collateral damage includes the documented prevalence of Brodifacoum and other SGAR rodenticide poisons now discovered in a large percentage of mountain lions, bobcats, raccoons, skunks, and a small mammal called the Pacific Fisher, as well as the frequent poisoning of eagles, hawks, owls, and even household pets - and occasionally children - all inadvertently exposed to this dangerous compound. The obvious functional obsolescence of Brodifacoum amidst evidence of mounting ecosystem contamination and human safety concerns is now prompting society to employ more focused, humane ways to address pest control. This shift is driving the rapid development of much-needed scientific advancements in fertility control measures as a more effective abatement tool for rodents, including mice.

Raptor Killed by Rodenticides

When the First Try Fails, They Do It Again

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

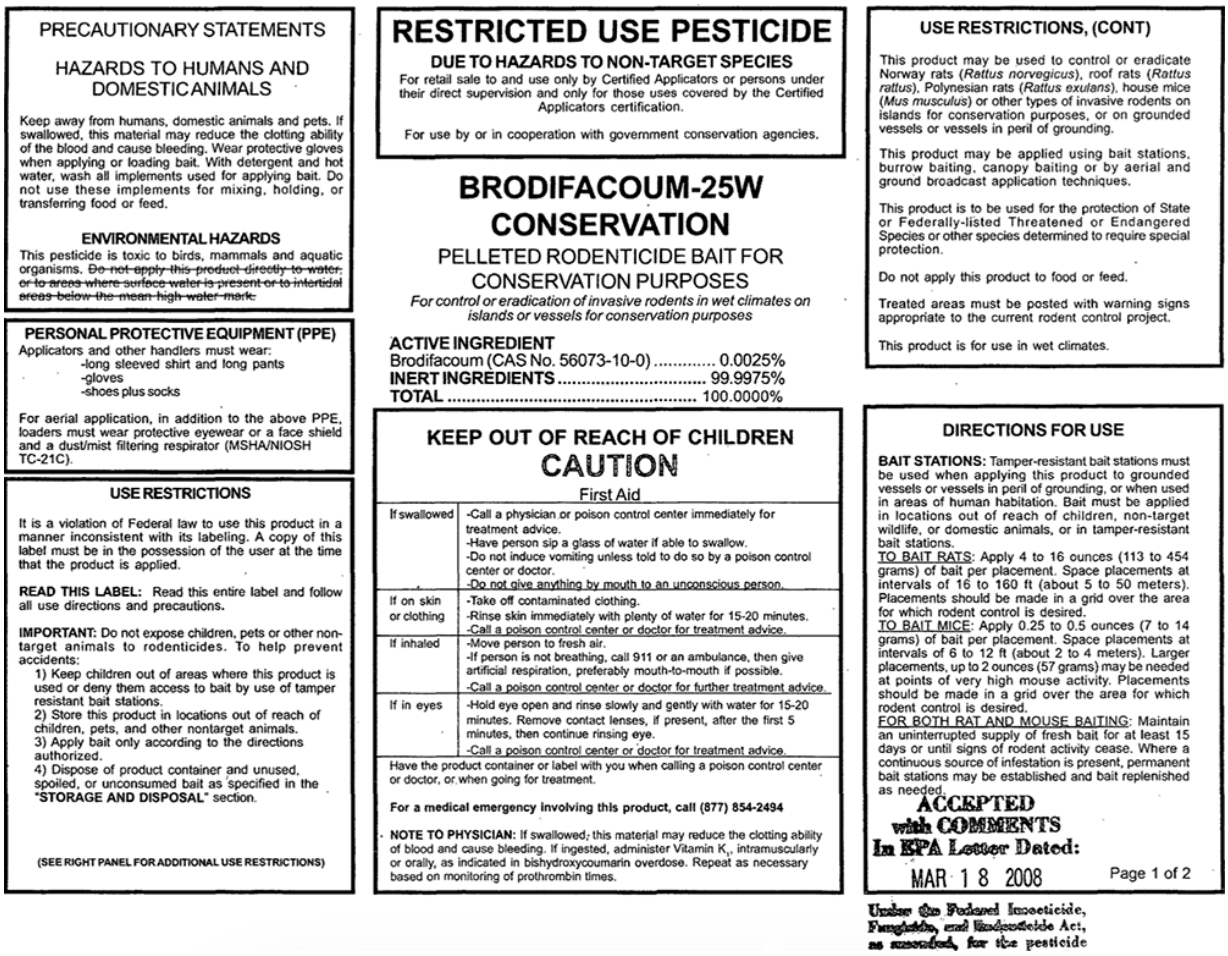
The official EPA **label** on a package for Brodifacoum rodent bait clearly specifies prescribed legal application limitations that are aimed at strictly constraining the amount of poison that can be spread per unit area. The Environmental Protection Agency, however, has previously granted label modification requests to other prior poison projects by simply issuing what is called a "Supplemental Pesticide Label" for the Brodifacoum 25-D Conservation bait that the Service is planning to utilize during the Farallones drop. If granted, such a label exemption would mean that more poison than normally allowable within a given acreage would then be distributed over the Farallones. Page 82 of the Wildlife Service's Final Environmental Impact Statement for the project states: "The specific bait product used for this alternative is registered with the EPA (EPA Reg. No. 56228-37) and would be applied in compliance with EPA and the Federal Insecticide, Fungicide and Rodenticide Act bait label. As described in Section 2.10 and elsewhere in this FEIS, *a supplemental label will be acquired*, in consultation with USDA/APHIS and EPA, to allow the Service to adopt bait label specifications to suit specific needs of this project."

For this kind of poison, a label modification, when granted by EPA, is usually requested in order to boost the level of toxic exposure in an attempt to increase the probability that the first poison application might be more likely to kill a higher percentage of the target species. There is, however, no way to predict whether or not increasing the poison coverage will increase the odds of achieving total eradication of mice on the first try. Over-application of this bait, when facilitated by such label changes, unfortunately also can increase the level of threat posed by the poison to non-target species and has therefore been associated with some of the worst biological mishaps caused by similar rodenticide drops elsewhere.

The ecological dynamics of the Farallones differ from other islands, in part because species there interact so closely with nearby mainland coastal ecosystems. The simple fact that what may appear to be a problem for one of its seabird species due to predation by only a few migrating burrowing owls from the mainland - themselves attracted by mice - means that the projected remedy strategy is not a direct one, thus it should not be undertaken in haste using primitive methodologies like the proposed blanket aerial poison application.

Disasters Elsewhere:
Even When Everything Goes Right, Things Go Wrong

Unanticipated non-target harm to ecosystems on other islands around the globe resulting from spreading Brodifacoum poison is well-documented. Not surprisingly, follow-up analytical studies found that Brodifacoum was still present in fish within the drop zone three years after the carefully-planned 2012 helicopter application of this same poison on **Wake** Island. The U.S. Air Force, following the Brodifacoum application there, recommended a restriction on human consumption of fish for **942** days. Since the initial poison bait application on Wake Island also failed to permanently eradicate all of the targeted rats at all locations there, a proposal for a repeat application justifiably remains very controversial.



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Wear protective gloves when applying or loading bait. With detergent and hot water, wash all implements used for applying bait. Do not use these implements for mixing, holding, or transferring food or feed.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, mammals and aquatic organisms. ~~Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.~~

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:
-long sleeved shirt and long pants
-gloves
-shoes plus socks

For aerial application, in addition to the above PPE, loaders must wear protective eyewear or a face shield and a dust/mist filtering respirator (MSHA/NIOSH TC-21C).

USE RESTRICTIONS

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. A copy of this label must be in the possession of the user at the time that the product is applied.

READ THIS LABEL: Read this entire label and follow all use directions and precautions.

IMPORTANT: Do not expose children, pets or other non-target animals to rodenticides. To help prevent accidents:
1) Keep children out of areas where this product is used or deny them access to bait by use of tamper resistant bait stations.
2) Store this product in locations out of reach of children, pets, and other nontarget animals.
3) Apply bait only according to the directions authorized.
4) Dispose of product container and unused, spoiled, or unconsumed bait as specified in the "STORAGE AND DISPOSAL" section.

(SEE RIGHT PANEL FOR ADDITIONAL USE RESTRICTIONS)

RESTRICTED USE PESTICIDE

DUE TO HAZARDS TO NON-TARGET SPECIES

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicators certification.

For use by or in cooperation with government conservation agencies.

BRODIFACOUM-25W CONSERVATION

PELLETED RODENTICIDE BAIT FOR CONSERVATION PURPOSES

For control or eradication of invasive rodents in wet climates on islands or vessels for conservation purposes

ACTIVE INGREDIENT	
Brodifacoum (CAS No. 56073-10-0)	0.0025%
INERT INGREDIENTS	99.9975%
TOTAL	100.0000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

First Aid

If swallowed	-Call a physician or poison control center immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to do so by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
If on skin or clothing	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor for treatment advice.
If inhaled	-Move person to fresh air. -If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. -Call a poison control center or doctor for further treatment advice.
If in eyes	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or when going for treatment.

For a medical emergency involving this product, call (877) 854-2494

NOTE TO PHYSICIAN: If swallowed, this material may reduce the clotting ability of blood and cause bleeding. If ingested, administer Vitamin K_1, intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

USE RESTRICTIONS, (CONT)

This product may be used to control or eradicate Norway rats (*Rattus norvegicus*), roof rats (*Rattus rattus*), Polynesian rats (*Rattus exulans*), house mice (*Mus musculus*) or other types of invasive rodents on islands for conservation purposes, or on grounded vessels or vessels in peril of grounding.

This product may be applied using bait stations, burrow baiting, canopy baiting or by aerial and ground broadcast application techniques.

This product is to be used for the protection of State or Federally-listed Threatened or Endangered Species or other species determined to require special protection.

Do not apply this product to food or feed.

Treated areas must be posted with warning signs appropriate to the current rodent control project.

This product is for use in wet climates.

DIRECTIONS FOR USE

BAIT STATIONS: Tamper-resistant bait stations must be used when applying this product to grounded vessels or vessels in peril of grounding, or when used in areas of human habitation. Bait must be applied in locations out of reach of children, non-target wildlife, or domestic animals, or in tamper-resistant bait stations.
TO BAIT RATS: Apply 4 to 16 ounces (113 to 454 grams) of bait per placement. Space placements at intervals of 16 to 160 ft (about 5 to 50 meters). Placements should be made in a grid over the area for which rodent control is desired.
TO BAIT MICE: Apply 0.25 to 0.5 ounces (7 to 14 grams) of bait per placement. Space placements at intervals of 6 to 12 ft (about 2 to 4 meters). Larger placements, up to 2 ounces (57 grams) may be needed at points of very high mouse activity. Placements should be made in a grid over the area for which rodent control is desired.
FOR BOTH RAT AND MOUSE BAITING: Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of rodent activity cease. Where a continuous source of infestation is present, permanent bait stations may be established and bait replenished as needed.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 18 2008

Page 1 of 2

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide

A Modified Supplemental Label from EPA

Elsewhere, previous unfortunate examples of disastrous “incidental” ecological damage caused by helicopter poisoning with Brodifacoum and similar rodenticides have unintentionally killed Peregrine Falcons, Glaucous-Winged Gulls, and many species of raptors. In Alaska, belated monitoring conducted after the U.S. Fish and Wildlife Service’s infamous 2008 Hawadax Island poison drop (colloquially known as *Rat Island*) ultimately **documented** 46 dead Bald Eagles and a total of 467 bird carcasses. Unanticipated delays after the drop in Alaska meant that the required post-project monitoring was inexplicably postponed until a full eight months after the poison was applied, so a full **count** of the unintentional bykill will never be known. Globally, many similar island poisoning projects have not been subjected to truly independent monitoring, thus the self-serving tendency of some subcontractors to fail to duly report unexpected

project anomalies would appear to result in misleading claims of successful eradications, even when unacceptable side-effects have clearly occurred.

The Consensus:
Scattering Poison in a National Marine Sanctuary Would Be Irrational

The Southeast Farallon Island lies in the midst of the Greater Farallones National Marine Sanctuary, which was created primarily in response to past Department of Interior federal oil and gas leasing overtures for offshore drilling in these waters. The concerted bipartisan effort that eventually led to the original 1981 NOAA designation for this Marine Sanctuary involved a broad coalition of local governments, commercial and sport fishing interests, and the public, along with a multi-term sequence of California governors, congressional Representatives, and U.S. Senators. These stakeholders banded together for many years to seek a protective federal mechanism that would reliably preclude pollution from any source, while also permanently banning offshore oil and gas leasing within these Sanctuary waters.

The resulting Greater Farallones National Marine Sanctuary today provides some of the most carefully-crafted marine resource protections anywhere in the world. The science-based Marine Sanctuary stewardship of these waters by NOAA includes duly adopted “enter and injure” regulations that even prohibit the introduction of any substance that originates *outside* of Sanctuary boundaries, but which may subsequently be conveyed *into* the Sanctuary boundaries on breezes or ocean currents, if the introduced substance in any way alters Sanctuary values and resources. This elevated level of resource protection is a model that should become standard throughout other Marine Sanctuaries nationwide, rather than being disregarded as something to be undermined by the dangerous precedent inherent in the proposed poison drop.

Most of the stakeholders directly involved in the original creation of the Greater Farallones National Marine Sanctuary have collectively expressed their opposition in response to any plan to drop Brodifacoum from helicopters in the midst of this Sanctuary. In addition, California's critical Marine Life Protection Act stakeholder process resulted in the 2010 designation of two important State Marine Protected Areas that lie immediately to the north and south of the Southeast Farallon Island, adding an additional level of adjacent state protections that are encompassed within the overarching National Marine Sanctuary framework. Ocean stewardship by the State of California overlaps the Greater Farallones National Marine Sanctuary throughout these contiguous State Marine Protected Areas, with State jurisdiction extending up to three miles seaward from adjacent land. Meaningful consultation by the Wildlife Service with the full range of state authorities by fully disclosing all potential project impacts on these critical sites has also been largely lacking to date. In addition to these federal and state protections, the Farallon Islands and the entire surrounding coastal region have, since 1988, been further protected in the global context as part of the UNESCO Golden Gate International Biosphere Reserve.

The Stewardship Mandate:
A Place Protected by NOAA and the State of California

On the Southeast Farallon Island, the U.S. Fish and Wildlife Service has operated under the pretext that the surrounding Greater Farallones National Marine Sanctuary ought to have minimal direct jurisdictional authority over the Wildlife Service's proposed helicopter bait drop. The Wildlife Service assumes that in spite of the planned aerial dispersal of so much deadly poison, not one single toxic pellet would manage to fall into Sanctuary waters. This implausible theory disregards the steep vertical gradient of the precipitous slopes of this island, while ignoring the natural effects of wind, waves, rain, and gravity and their inconvenient tendency to inevitably convey poison pellets into the surrounding intertidal zone and ocean waters. During similar helicopter poison drops on the island of Lehua, Hawaii, conducted in August and September of 2017, even a supposedly carefully-targeted application of what is called a *first-generation* rodent poison, Diphacinone, managed to result in swaths of the rodenticide pellets being **extensively** distributed throughout the intertidal zone and into the ocean itself. The presence of this poison was documented in **video** and photographs, with the toxic pellets clearly visible in the water among floating dead fish and seabird carcasses.

Lehua, Hawaii Aftermath

The Need for Compassionate Conservation

The protected Farallones today provide critical seabird and marine mammal rookery and nursery habitat. No other location in North America shelters a similarly robust concentration of sensitive species outside of Alaska. Fish and Wildlife proposes to utilize a poison that can impact virtually all living things that remain present during and immediately after the poison drop, except insects, although insects can covey the poison to anything that consumes them. A host of other non-target species would also be subjected to secondary exposure to the poison as a result of the proposed project's *scorched earth* method of execution and the accidental dispersion of poison into the ocean. Studies have found that certain **sea turtles** appear to be even more susceptible to the anticoagulant rodenticides than rats.

In addition, the proposed plan includes capturing limited numbers of certain species in nets or traps. These animals would then be isolated and held in captivity at off-island locations during the poison drop, to later theoretically be reintroduced to re-populate their former native habitat once the toxic bait concentrations on the island are believed to have sufficiently subsided.

Lehua, Hawaii Aftermath

Species from the wild, when held in captivity, are put under stress and become particularly susceptible to disease, as evidenced by the unanticipated viral outbreak among valued endemic mice that were sequestered in a building for their protection during a 2009 poison project aimed at killing rats on Southern California's Anacapa Island. The birds and fish that inhabit the Southeast Farallon Island and the surrounding waters are federally-designated Marine Sanctuary resources, so any weakening of the survivability of key species would be an interruption of the very ecosystem function that the Sanctuary site was designated to protect.

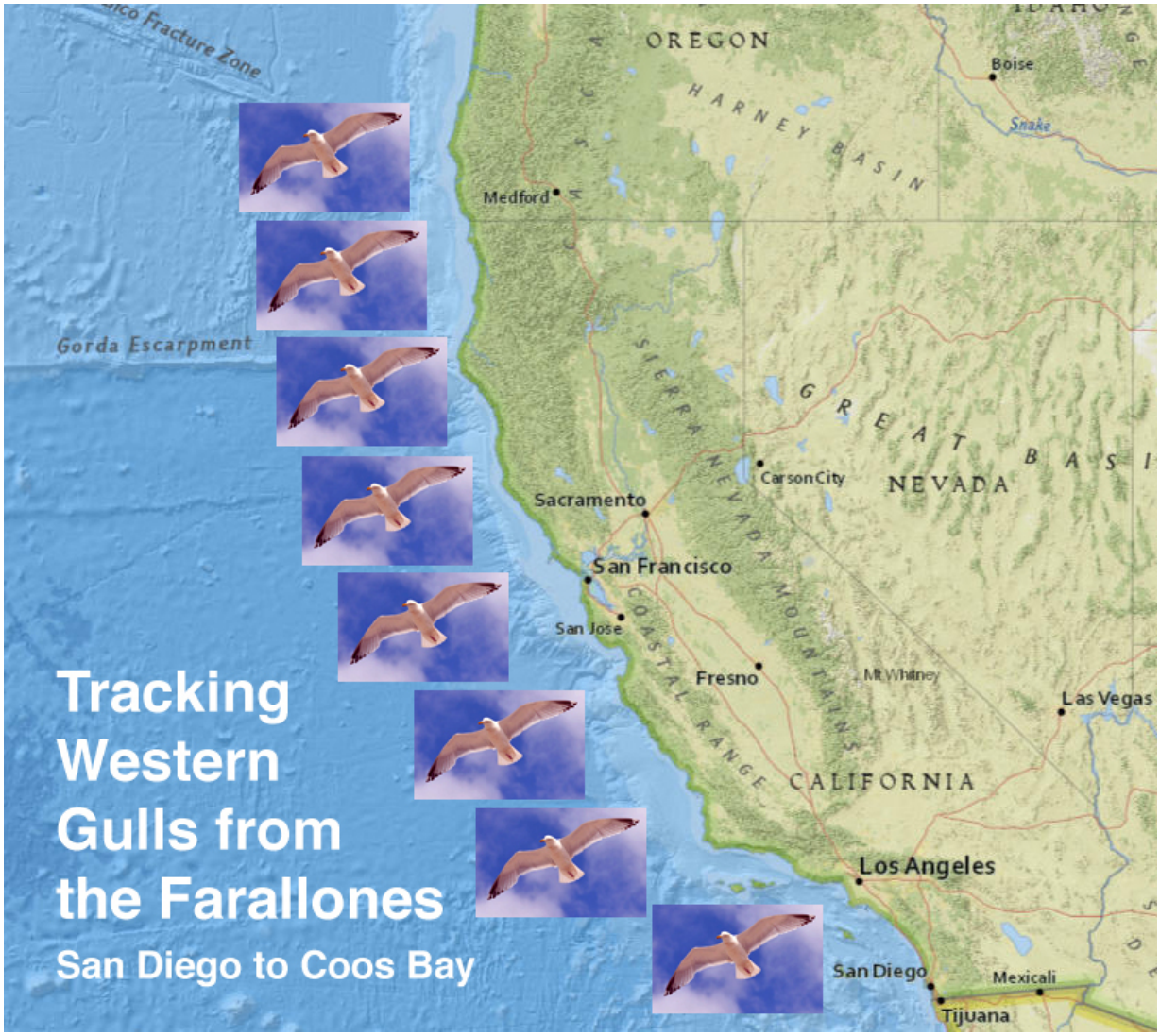
What Happens on the Farallones Doesn't Stay On the Farallones

The Fish and Wildlife Service has previously made the assertion that their sole-source private subcontractors would somehow be able to successfully *haze* - or frighten away - virtually every single animal of each mobile non-target species during their project. Thereafter, this kind of *hazing* would need to continue to reliably keep these species frightened away from their customary natural habitat throughout the anticipated multi-week duration of the initial poisoning, as well as again for the duration of any of the follow-up applications of poison. This attempted *hazing* effort hypothetically involves the use of propane cannons, fireworks, lasers, "cracker" shells in shotguns, and other unproven wildlife deterrent techniques that have demonstrated only a partial degree of success elsewhere. Often tried around hydroelectric dams and during oil spills, *hazing* has shown only limited effectiveness at dissuading gulls, in particular, from remaining on their home habitat. Gulls, as any picnicking beachcomber knows, can be very persistent in circumstances in which anything resembling food is made available to them. Dead and dying mice would definitely be considered a food source to hungry gulls.

In the context of habitat disturbance, the proposed *hazing* activities are, by themselves, clearly inconsistent with the stewardship values and related regulations of the surrounding National Marine Sanctuary. Timely **comments** by the Greater Farallones National Marine Sanctuary and its own Sanctuary Advisory Council raising these and related questions have not yet generated a formal response from the U.S. Fish and Wildlife Service.

Internal U.S. Fish and Wildlife Service emails have revealed that the agency's experienced staff with expertise in similar helicopter rodenticide drops concede that they anticipate the slow death of as

many as 3,000 of the Farallones' Western gulls if this project is allowed to proceed. U.S. Fish and Wildlife now says that if damage from their Farallones plan reaches 1,050 Western Gulls, population damage would occur. Given the toxicity of the compound being used and its direct and indirect pathways to Western Gulls, it is reasonable to anticipate reaching that number. Studies tracking Western Gulls from the Farallones have revealed that these birds have been found as far south as San Diego, California and as far north as Coos Bay, Oregon. Poison proponents boast that their Farallones project will require only one-and-a-half ounces of Brodifacoum, underscoring the fact that the incredibly potent toxicity of this poison requires dilution into a ton-and-a-half of cereal bait for wide dispersal and even then each kernel of bait still packs a large number of fatal doses.



Western Gulls from the Farallones Commute to the Mainland

In their independent federal agency review of the proposed Farallones project, the office of Region IX EPA has also cautioned, in their official comment **letter** of April 15, 2019, that the carcasses of poisoned gulls resulting from incidental bykill at the Farallones are expected to wash up on mainland California beaches and will need to be handled with HAZMAT toxic hazardous waste precautions, due to their likely body burden of residual Brodifacoum.

There has been no plan released for how the carcasses of this beached bykill could then be safely handled, and there is no identification of where the carcasses would be taken for disposal.

Fish and Wildlife theoretically justifies their predicted *acceptable level* of incidental non-target bykill with the optimistic rationalization that overall population numbers for most of the damaged non-target species will hopefully ultimately achieve *sufficient natural recovery* within ten years after the drop. There have not been any studies provided that can reliably substantiate this one-decade recovery timeline claim for damaged non-target populations, or even whether such recovery is actually achievable. Unforeseen effects of human endeavors often appear in ways that cannot be predicted, as the unintended consequences cascade through entire ecosystems.

Poisonous Politics:
Fumbling by the Feds

The ambiguous regulatory status of the Farallones poisoning proposal results from a prior abortive 2019 permit application by the U.S. Fish and Wildlife Service to the California Coastal Commission as the Wildlife Service at that time previously attempted to secure a necessary key approval in the form of a “federal consistency determination”. Local Fish and Wildlife staff, while presenting at a July, 2019 Coastal Commission hearing in San Luis Obispo, California, were regrettably unable to answer relevant questions being asked of them by Coastal Commissioners. Questions from the Commission included requests for the project sponsors to identify at what point during the poison drop, in the event that Fish and Wildlife were to observe “excessive” bykill of non-target species, would the project’s personnel decide to halt the poison application once it had begun. No answer to this question was forthcoming from the Wildlife Service staff present at this hearing. Another legitimate inquiry by the Coastal Commissioners then present, about the Service’s emergency first-responder plan should a helicopter-originated spill of poison bait pellets accidentally take place - either on the island itself, on the mainland, or over the waters of San Francisco Bay or the Pacific Ocean – also left the Fish and Wildlife Service staff unable to respond. Large accidental poison pellet bait spills have occurred in New Zealand, absent any effective response protocols, so this is an important question. An apparent lack of timely answers by Wildlife Service representatives to legitimate questions about the Farallones proposal at the 2019 California Coastal Commission hearing resulted in a temporary withdrawal of the project application by the Service at that time.

Now, a revised re-application to conduct the Farallones poison drop by the U.S. Fish and Wildlife Service is expected to be resubmitted during the spring of 2021, with the California Coastal Commission

subsequently tasked with deciding whether or not to reconsider a determination of federal consistency for the Farallones poisoning. This will likely be taken up at one of the Commission's monthly meetings, as early as May of 2021, or soon thereafter.

Any decision by the California Coastal Commission about the fate of the Farallones would set an important precedent for a host of proposed poison projects that could similarly threaten dozens of other U.S. islands. The Coastal Commission's decision about the Farallones could thereby also determine the precautionary *level-of-care* standards going forward for this particular National Marine Sanctuary as a model for addressing adverse poison impacts in other sensitive locations considering similar proposals.

Who's Opposing Safer Alternatives and Why? The Hard Conversation that Some Poison Advocates Don't Want to Have

This controversial poisoning plan at the Farallones would likely have expired of its own irrational irrelevance by now, but the commercial pesticide industry and its profit-seeking cohorts have a strong fiscal motivation to ensure that the current supply chain of anticoagulant rodenticides is viewed by the public in a favorable light. The pesticide companies, including those involved at the Farallones, often rely on what they call the *"ick factor"* to try to frighten the public about all types of pests. Some global interest groups with virtually unlimited financial resources continually disseminate fear-based propaganda aimed at attempting to discredit more humane alternatives so that the use of Brodifacoum and similar poisons can be falsely portrayed as the only available option for places like the Farallones. Substantial financial benefits would accrue to some of these organizations if the poison drop on the Farallones is allowed to go forward, and those same entities therefore make every effort to try to portray solutions other than Brodifacoum as nonviable.

One could reasonably ask why otherwise credible groups might seem to favor this destructive project amidst such a sensitive ecosystem setting. In spite of a tragic history of notable biological messes and notorious ecological disasters that extends from Rat Island to Palmyra and beyond, this type of *Death by Conservation* endeavor remains very financially profitable for those seeking non-competitive government funding. The underlying belief among poison proponents seems to be that the ends justify the means. But in the case of Brodifacoum, the *ends* are clearly known to create foreseeable *new problems*, while the *means* have frequently *failed* to accomplish the stated goals, particularly with respect to the history of failed attempts at the total elimination of mice. The total elimination of an adapted invasive species would best be achieved in a

balanced manner by targeting the root of the problem, which is reproduction. This means slow removal, progressing to theoretical elimination, then restriction of renewed invasion.

Some entities involved in publicly expressing support for the Farallones proposal even appear capable of suspending any semblance of compassion, ignoring the most fundamental humane principles with respect to nontarget bykill casualties. Various groups seem to find it helpful to try to divorce the slow death leading to so much extensive unnecessary overkill by falling back on the false rationalization that even if the Brodifacoum poison does cause population level damage, that the Farallones ecosystem will just *have to take a one-time hit* in order to try to eliminate the misplaced mice. This theory simply attempts to justify trading the possible enhancement of *one species* in the ecosystem for known deliberate damage to *many other species*, an arbitrary value judgment that ignores overall ecosystem stability and provides an argument based not on real science, but one that instead relies on human hubris.

Farallones Arboreal Salamander

Unproven Theories:
Trading One Species for Another

Worldwide, certain seabirds may indeed be at some degree of risk due to the ravages of longstanding anthropogenic impacts, but substituting one human impact for another is not a step toward true ecosystem recovery. The hypothetical case statement implying that the Ashy Storm Petrel population at the Farallones may be at risk from Burrowing Owls has clearly not been made in a manner that has thus far proven convincing to the U.S. Fish and Wildlife Service itself, or this agency would not have twice in the past categorically denied enhanced regulatory protections for the same species.

Islands everywhere are living laboratories for understanding the interplay between food web interactions and ecosystem function relationships. To arbitrarily disrupt the entire food web at the Farallones in the haphazard quest to possibly benefit one single species, absent any conclusive evidence that this species is really in trouble, is merely a personal value judgment that has little scientific basis. Seabirds themselves are ecosystem engineers, as are Burrowing Owls. Clearly, a better overview of the entire Farallones food web and how it interacts with the mainland, including the role of multiple species of seabirds, the island's plants, the endemic Camel Cricket, the Farallones Arboreal Salamander, and even the Burrowing Owls, is needed before any official approval is given to the proposed poison drop.

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*In the **words** of Dr. Michael Fry of the U.S. Fish and Wildlife Service, in predicting gull mortality: "Probably half will die in San Francisco. Minimum number will be 3000*

dead gulls in SF. More if the hazing is less successful."

Safer Ways:
More Focused and Less-Destructive Pest Control Alternatives Are Now Available

Predictably, scientific research is now advancing in response to the moral and ethical questions posed by habitual misuse of the current versions of anticoagulant chemical compounds. Accommodating an obvious emerging market demand for a new generation of rodent control mechanisms amidst compelling evidence of the obsolescence of second-generation anticoagulant rodenticides like Brodifacoum will likely prove to be a strong motivator for adaptation by this industry. U.S. and international research laboratories, responding to emerging societal pressures to find new methods of rodent control that are less damaging to sensitive ecosystems, have already made significant advances in the applied biochemistry of fertility control measures. This welcome technological progress has also resulted in substantial advancements in the timely agency permitting and commercial application of contraceptive baits for safer rodent control.

The emerging new generation of contraceptive baits depend on species-specific fertility control and thus don't damage non-target living systems, don't bio-concentrate in the food chain, and are presently approved for use by EPA and the California Department of Pesticide Regulation. These contraceptive baits are now being utilized throughout the food production industry, by animal rescue entities, and by the poultry industry for control of rats. Development of similar contraceptive baits that are of solid formulation for broadcast for mice is now progressing rapidly, and will enable Fish and Wildlife to refocus the use of effective fertility control technologies that pose no threat to nontarget species. The Wildlife Service could easily proceed in a more constructive direction without delaying efforts toward their proposed project on the Farallones.

The most logical procedural path forward at this time would be for the U.S. Fish and Wildlife Service to issue a Supplemental Environmental Impact Statement (SEIS) document that resurrects the previously-studied, but prematurely-discarded, option of using contraceptive bait for the proposed project at the Farallones. The agency should update their present outdated version of a NEPA document to instead adopt a more noncontentious and less dangerous approach, fully reflective of recent advances in the use of contraceptive baits to target invasive mice.

This more current and contemporary science would move the present policy debate away from *whether or not* to rid the Southeast Farallon Island of mice, and instead promote a more constructive evaluation of *how best to* eradicate the mice from the Southeast Farallon Island without unnecessary collateral damage to the vast populations of innocuous non-target species that share the same habitat within the Greater Farallones National Marine Sanctuary. Achieving balanced decline of the adapted invasive species, without the bykill, should be the goal of any project at the Farallones.

There appears to be no viable way that any eradication project variant involving helicopter dispersal of Brodifacoum poison could avoid unacceptable multi-year incidental damage to commercially and ecologically important terrestrial and marine species, nor could such a project provide sufficient assurances that associated activities would not adversely impact valuable fishing grounds and critical fisheries habitat in the waters immediately surrounding the Farallones. It must be kept in mind that an essential regional economy is based upon the integrity and marketability of seafood from these waters, as well as on the fragile public perception of the safety of the produced seafood commodities by the consumer.

Viable Solutions Are Already Available

The Secretary of Interior should instruct the U.S. Fish and Wildlife Service to consult with the relevant Tribes having traditional cultural landscapes in this region to obtain their consent for any proposed action and for the anticipated adverse impacts.

Further, the Secretary of Interior needs to instruct the U.S. Fish and Wildlife Service Director to withhold the issuance of the decisive *Record of Decision* document and to also freeze all permit actions involving this project as currently proposed. An objective process can then ensure the efficacy and permit availability for harmless fertility control baits capable of achieving the project purpose without excessive devastating bykill. The option of fertility control can then be fully evaluated by the agency in a transparent NEPA proceeding involving the requisite public and Tribal input.

By considering *Traditional Ecological Knowledge* in the context of animal welfare alongside animal conservation, it may become possible to establish wildlife management protocols that are explicitly oriented towards the lives of individual animals and their social groups, not just the species or population as a whole.

Your Voice Counts:
Public Resources at Risk on Your Public Lands

The California Coastal Commission is the most important public agency that will need to consider whether or not to allow the Farallones Poison Drop to proceed, because the proposal is within the Coastal Zone of the State of California. Even though the island itself is comprised of federal land in a National Wildlife Refuge surrounded by the federal protections granted by the Greater Farallones National Marine Sanctuary, its proximity to the mainland actually makes the geographic location a part of the City of San Francisco. The California Coastal Commission is being asked by the U.S. Fish and Wildlife Service to grant their consent through what is called a “consistency determination”. Such an action would certify that the poisoning proposal is consistent with the state’s federally-approved Coastal Zone Management Plan. As noted, when the Wildlife Service last approached the California Coastal Commission for such an approval at the July 2019 public hearing in San Luis Obispo, it was apparent that many of the questions posed to the Wildlife Service staff by Coastal Commissioners could not be answered. Fortunately, the application was temporarily withdrawn by the Wildlife Service at that time. Prior public meetings on this proposal held by the U.S. Fish and Wildlife Service in San Francisco in May of 2011 provided clear evidence of the strong regional opposition to this poison plan.

The central primary principle which each individual member of the California Coastal Commission is sworn to uphold on behalf of the State of California is the protection of *Environmentally Sensitive Habitat Areas* within the Coastal Zone, also known as *ESHA*. With a globally-significant concentration of critical habitat and the recognized diversity of fragile wildlife, the Farallones themselves represent the heart of what is referred to as *Hyper-ESHA*.

The California Coastal Commission itself is structured in such a manner that the prevailing views of the public are generally - but not always - reflected in the decisions reached by the Commission. Since the monthly meetings of the Coastal Commission will likely remain in an online webinar mode, virtual public hearing testimony will be taken by the Commission to hear from those who have previously submitted an online registration to testify. One must use the Commission's user-friendly website for the appropriate month's **agenda** to sign up to testify at the upcoming virtual **public hearing** on this proposal. Meanwhile, letters and emails to the Coastal Commissioners should be submitted as early as possible prior to their anticipated decision at a special meeting on this topic that may occur as early as June of 2021.

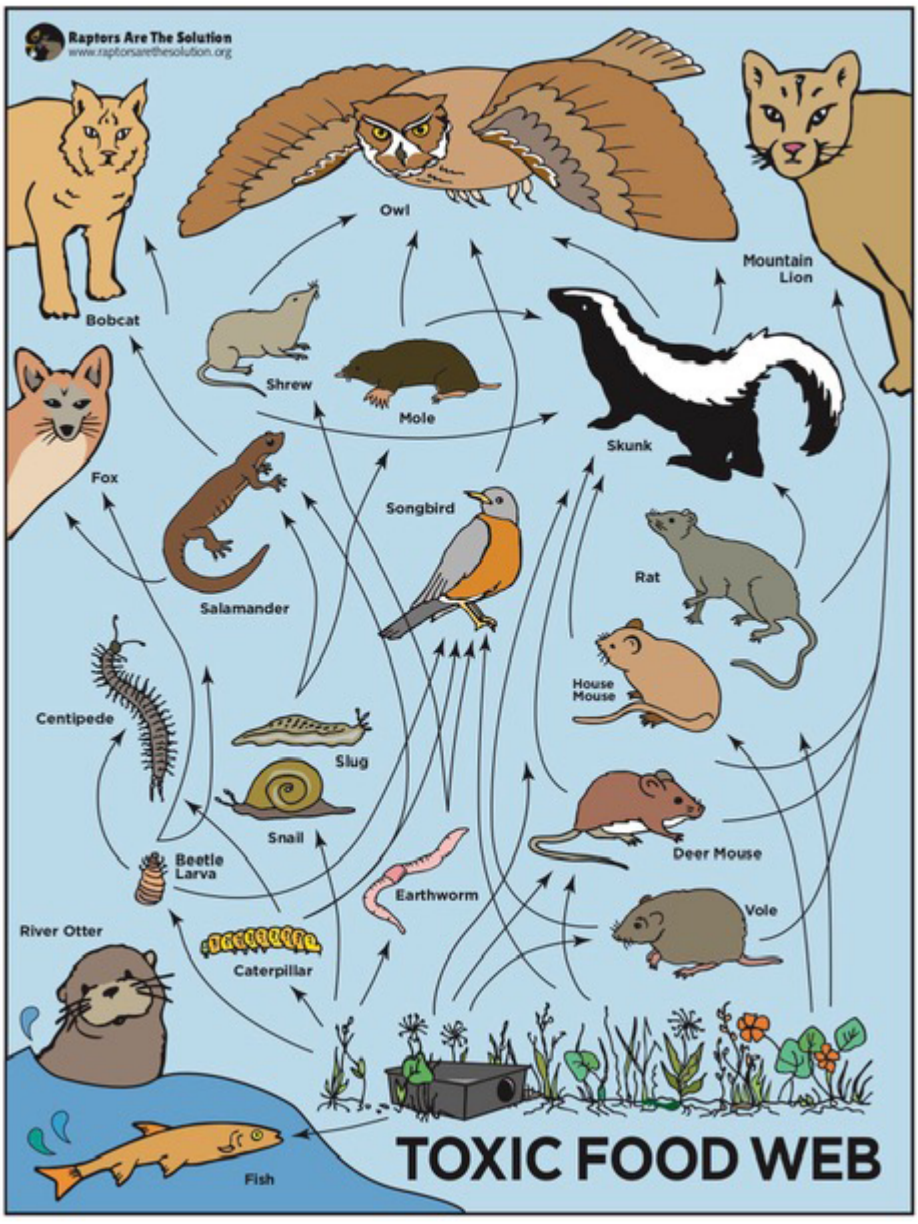
The most important single thing that you can do at this time is to send a short email expressing your views on this proposal to **farallonislands@coastal.ca.gov**

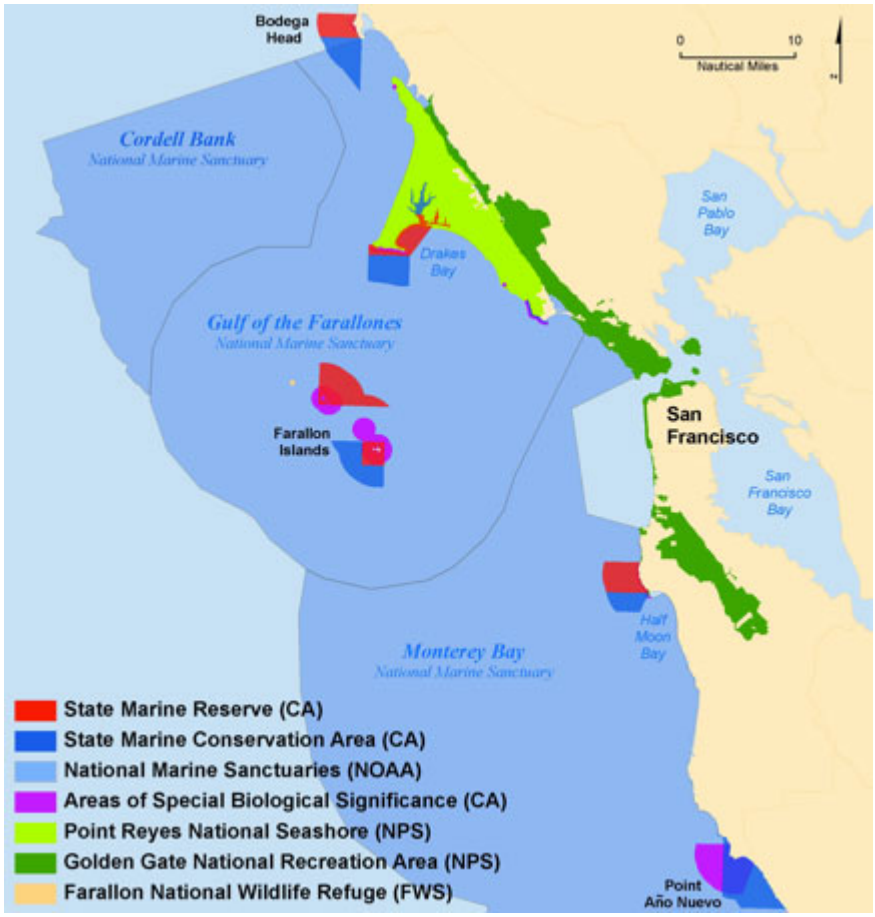
Other state and federal agencies will also be opening important opportunities for further public input, and the appropriate links for you to comment on these will be updated as they become available at **http://PoisonFreeSanctuary.org**

Because of the sensitivity of our special coastal environment and the profound precedents involved for all wildlife, this is going to be one of the most important decisions in the history of the California coast.

Thank you for joining us.

Please send an email now to:
farallonislands@coastal.ca.gov

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National Marine Sanctuary
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San Francisco
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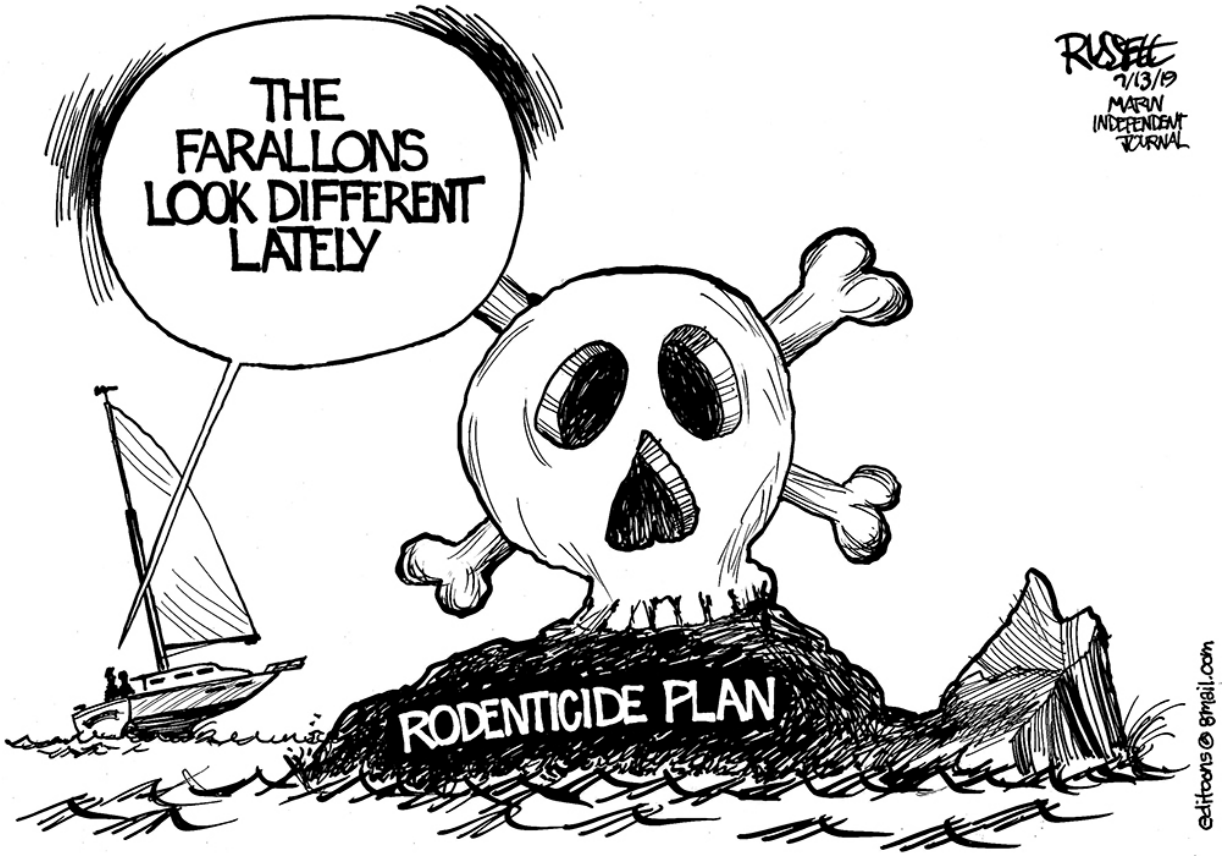
Half Moon Bay
Monterey Bay
National Marine Sanctuary
State Marine Reserve (CA)
State Marine Conservation Area (CA)
National Marine Sanctuaries (NOAA)
Areas of Special Biological Significance (CA)
Point Reyes National Seashore (NPS)
Golden Gate National Recreation Area (NPS)
Farallon National Wildlife Refuge (FWS)
Point Año Nuevo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About the Author and the Book Team:

Richard Charter has been working for over four decades to ensure protection for fragile marine ecosystems and sensitive coastlines throughout the world. A Senior Fellow with the Coastal Coordination Program of The Ocean Foundation, he helped to coordinate the local government and congressional support that led to the initial creation of the original Gulf of the Farallones, Cordell Bank, Channel Islands, and Monterey Bay National Marine Sanctuaries along the California coast. Mr. Charter has also worked for the past twelve years to protect the wildlife of the Greater Farallones National Marine Sanctuary from dangerous wildlife poisons. Publications include the book "Bring Back the Gulf", "Negotiating for the Nonnegotiable on the California Coast" in the MIT Environmental Assessment Review, "An Intergovernmental Response to Offshore Oil and Gas Leasing", and numerous magazine and newspaper articles.

Co-Editors/Researchers:

Maggie Sergio is a conservationist, environmental educator and writer. She has researched and written about a wide range of environmental issues including the impact of rodenticides on wildlife, the open-air testing of experimental pesticides and GMOs in Hawaii, and the little-known industry behind the practice of island eradications.

Lou-Anne Fauteck Makes-Marks, PhD, Coast Miwok, Pomo, is the Director of Sacred America. Visit online at sacredamerica.org

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This publication is gratefully dedicated to the ethical practitioners who understand and apply the principles of compassionate conservation based upon sound science and the humane treatment of all animals everywhere.

Our Poison Free Sanctuary:

This book is about the contentious global debate over whether we, as humans, can justify the random destruction of nature as a method of theoretically "saving" one particular species at the cost of others. Can knowingly engaging in the widespread torment of harmless wildlife populations ever be rationalized as a way of trying to help one single species? Once humans have disrupted an ecosystem, efforts to try to restore balance, even centuries later, must require a careful assessment to ensure that the attempted remedy is not worse than the observed imbalance itself.

A very profitable part of the pesticide industry has developed around a casual disregard for the inhumane methods of wildlife poisons which inevitably cause the unnecessary suffering of many beneficial species. The trademark of past failures at "pest eradication" has come to be the excessive killing of harmless non-target animals amidst fragile ecosystems throughout the world. Fortunately, more targeted tools, in the arena of fertility control, are rapidly emerging to replace the present generation of brutal poisons. Benefits must outweigh the risks and harm-reduction needs to guide all aspects of any attempted remedy to control "invasive" species.

This is the urgent story of the amazing concentration of fragile wildlife on California's Southeast Farallon Island, and how this well-protected world-class ecosystem has now come to be targeted as a candidate for the proposed indiscriminate use of one of the most dangerous and inhumane poisons ever invented.

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December 10, 2021

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 want the California Coastal Commission to know of my strong support for the mouse eradication project on the Farallon Islands and urge you to approve it without delay. This project is essential to reversing the decline of a listed California Bird Species of Concern and is supported by the California Dept. of Fish and Wildlife. In 2008, the CDF&G's Bird Species of Concern report identified, "Reducing Burrowing Owl predation on storm-petrels at the South Farallon Islands by eradicating non-native House Mice", as a key management action. The project is also consistent with provisions of the California Coastal Act,

The Farallon Islands are managed by the United States Fish and Wildlife Service (Service). The Service has a history of restoring wildlife habitat to protect all fish and wildlife. The Service's past actions on the Farallon National Wildlife Refuge (Refuge) to remove the detrimental human caused impacts has resulted in a significant improvement in the habitat and supported wildlife species. The Refuge has once again become the largest seabird nesting colony south of Alaska as well as a significant habitat for marine mammals. One exception to this success has been the nesting population of the Ashy Storm-Petrel,a State listed Species of Concern. The Farallon Islands are the world's largest single colony of this seabird

Studies by the Service and its partners have determined that the main cause of the decline in the nesting success of the storm-petrel is the continued existence of the non-native house mouse and its interrelationship with the migratory Burrowing Owl. Once the non-native mouse's population crashes as a part of its regular population cycle, the migratory Burrowing Owl switches from feeding on the increasingly rare house mouse to the Ashy Storm Petrel. Despite feeding on the petrel, Burrowing Owl, also a California Species of Concern, on the Island end up starving to death for lack of food. If the owl had not been tempted to stay on the island by the abundant mouse prey, the migratory owl would have moved off the island and therefore prevented the destruction of the storm-petrel population and eventually, its own population. The only way to break this destructive cycle is to eliminate the non-native mouse as a part of the Service's ongoing restoration efforts on the Farallons.

The Service has consulted with a number of international organizations as to how best to remove the mice from the Farallons and restore the natural balance to the island's native populations. Based on these organizations' extensive experience, they recommend 100% eradication of the mouse with aerially applied rodenticide as the only proven effective method. Based on these recommendations, the Service conducted further studies to determine the safest was to use rodenticide to eliminate the mouse while mitigating the impact on non-target species. The Service has listened to the critics of the proposed use of rodenticide and has developed monitoring and contingency plans, and modified its project design to address these concerns.

As a supporter of the Service's efforts to restore the Farallon National Wildlife Refuge's efforts to enhance the island's native species while protecting sensitive species such as the Burrowing Owl, I urge the Commission to also support the mouse eradication project on the Farallons. Please vote to approve it.

/s/ Clyde Morris

December 10. 2021

California Coastal Commission
Attn: Cassidy Teufel 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)

Re: TH11b – DENY

Dear Commissioners:

I am reaching out to respectfully request that you deny the request of U.S. Fish & Wildlife Service (USFWS) for federal consistency determination.

My background includes years of working in wildlife rehabilitation, treating a wide variety of species. In my work, I witnessed the inhumane poisoning of wildlife due to rodenticide exposure—both directly through straight ingestion—and indirectly—by ingesting rodents that had been poisoned. The poison most commonly found in lab results was the second generation anticoagulant rodenticide, brodifacoum—the same poison USFWS is proposing be dropped out of helicopters over the Farallon Islands.

In 2013, I began researching the global island eradication industry, which traces its origins back to the New Zealand government in the 1970s. While USFWS and Island Conservation (the sole source contractor that will drop the poison) point to New Zealand as "experts" in saving species from extinction—the truth is dramatically different than what is portrayed on glossy websites and slick marketing campaigns making bold claims of success, that cannot be verified by an independent, third party.

In 2014, with the support of the Animal Legal Defense Fund, a retired Fish and Wildlife biologist and I filed a comprehensive Freedom of Information Act request to investigate the inner workings of the island eradication industry.

The information we received back was disturbing. The documents included a law enforcement report done after the Rat Island poison drop in 2008, which listed 10 criminal offenses, including violations of the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act and the Federal Insecticide, Fungicide, and Rodenticide Act. The Rat Island project resulted, at a minimum, of over 460 dead birds, including 46 dead bald eagles. And not all poisoned wildlife was accounted for.

Internal emails released under our FOIA request show that after the failed eradication attempt on Wake Island in 2012, toxicological testing of fish was carried out by the

United States Air Force, which maintains a base on Wake Island. After the fish tested positive for brodifacoum—the same poison headed for the Farallones—an Air Force official recommended a 942 day fishing ban.

In August and September of 2017, USFWS, DLNR and sole-source contractor, Island Conservation dropped 11.5 tons of anticoagulant rodenticide on the 284 acre island of Lehua, Hawaii. This drop failed to kill the rats on Lehua, and the following video was taken approximately four days after the second poison drop. You can clearly see dead fish and birds, floating in the water, surrounded by huge amounts of rat bait. After this video went viral on social media, a local lawmaker intervened and tried to halt the third and final drop, but was not successful. This recent drop was the second time an eradication project was carried out at Lehua, Hawaii. The first drop in 2009 had failed to kill the rats, and this recent drop in 2017 also failed.

The state of Hawaii did an investigation of the 2017 Lehua poison drop. The violation report, over 200 pages in length, included such comments as - *failure to notify HDOA pesticides branch of a large fish kill, wind speed not being recorded, the pesticide label not being in possession of the helicopter pilot, and the helicopter pilot not being properly licensed.*

The entire violation report, complete with a long list of infractions was completed in 2019. The document can be found at the link below and was released under FOIA.

https://drive.google.com/file/d/1-SykJdQhBf-_IEG3LeZA7WuyrtR2NhC9/view?usp=sharing

I have reviewed both the Final EIS and previous versions of the risk assessment since 2013. Much of the information in the Final EIS is inaccurate, misleading and outright false. The probability of success is grossly exaggerated and the environmental risks, including the projected number of deaths of nontarget species are ruthlessly downplayed. The truth has been sacrificed to push through the outdated use of helicopters and brodifacoum. If this project is allowed to proceed, the victims of the poison drop at the Farallon Islands will be all the living resources within the public trust, which USFWS has a legal obligation to protect, and all the constituents of our National Marine Sanctuaries System.

Several years ago, I received an email from USFWS. It was from a scientist who disagreed with dropping brodifacoum on the Farallon Islands because of the high number of nontarget animals that would be poisoned. The email mentioned the flying range of the western gulls, and the fact that the gulls on the Farallones fly back and forth daily to many of the tourist areas in San Francisco, including Fisherman's Wharf and Alcatraz Island. Also mentioned was the fact that it takes four – seven days before the poisoned gulls would succumb to the poison they had ingested. The end result would be thousands of gulls, dying very gruesome, public deaths in many of the tourist areas of San Francisco. This individual challenged the hazing plan outlined and estimated that, at a minimum, there would be 3000 dead gulls. More, if the hazing plan was not successful.

It is critical that the California Coastal Commission be made aware of not only the immediate risks to the Farallon Islands due to the proposed poison drop, but the larger threat of setting precedent by granting consistency determination for this type of antiquated and reckless methodology that does not discriminate which animals are poisoned, and has the potential to contaminate the Farallon Islands food web for up to one year.

In March 2019, Island Conservation published on the PloS One website that there are 292 island eradication projects planned at various locations around the globe. According to the map provided with island targets identified, a good portion will be located off the California coast.

Along with this comment letter, you will find a document entitled, *Island Eradications: History of Malfeasance & Violations*. I urge you to please take the time and go through the history of unintended consequences for these hazardous projects which includes causing the extinction of one species of snail during a drop in the Seychelles in 2001, and the extinction of the western weka from Tawhitinui Island, NZ in 1984.

Additionally, the following link takes you to a petition originally started on Change.org in 2013. At the time, I was petitioning USFWS to not move forward with poisoning the Farallon Islands. Over **32,000 people** signed this petition several years ago. I reopened the petition soon after hearing that the California Coastal Commission was considering granting consistency determination for this project. The total number of signers submitted with this comment letter is **39,654**.

Please deny this request by USFWS for consistency determination.

Sincerely,

Maggie Sergio
Aberdeen, North Carolina

Attachment: *Island Eradications: History of Malfeasance & Violations*

Island Eradications: History of Malfeasance & Violations

Due to the nature of island eradication projects taking place on remote islands around the globe, it is difficult to know the full extent of nontarget species that have been poisoned, or food web contamination that has occurred. This challenge is compounded by the fact that there is a lack of any independent, third party oversight for these projects. Only once, in 2011 for the Palmyra Atoll drop, was a third party agency (USDA) involved on the ground. When the same, sole-source contractor is hired to write the risk assessment, perform the poison drop, in addition to providing an accurate count of unintended animals poisoned, it is difficult to validate any positive claims being made.

This is not a complete listing of catastrophic outcomes for poison drops, but this information does provide a snapshot of the reality of what occurs when dropping a highly persistent poison over fragile island ecosystems. This information has been derived from a variety of sources including FOIA, eyewitness accounts and published papers.

Rat Island 2008
While the official Rat Island death toll listed is at 467 dead birds, including 46 bald eagles, we will never know how many animals were poisoned as USFWS and Island Conservation dropped 46 metric tons (more poison than they were allowed to drop by federal law) in October 2008, and did not return until May 2009. When carcasses were retrieved, only a partial search of the island was done. It is impossible to know how many poisoned animals were washed out to sea during the winter months in Alaska.

Rat Island Law Enforcement Report.
https://drive.google.com/file/d/1XsSATp5AFBqnelBmnsZC_6MZfZD7zyWp/view?usp=sharing

Rat Island violations cited - including violations of Migratory Bird Treaty Act, Bald & Golden Eagle Protection Act and FIFRA
https://drive.google.com/file/d/0BwdOUBgcb_baaVJlcWVhSERWQ1VlelE1UnRRa0pIQ205WFhF/view?usp=sharing&resourcekey=0-Aq_iHARvsYFN

The Ornithological Council, after their own investigation of what went wrong on Rat Island, delivered the following scathing report **- *The Rat Island Eradication Project: A Critical Evaluation of Non Target Mortality*.** That report can be found at the link below.
https://drive.google.com/file/d/0BwdOUBgcb_baak5VRU5XWVpXYVU/view?usp=sharing&resourcekey=0

Lehua Island, Hawaii 2017
In 2017, USFWS, DLNR and Island Conservation dropped 11.5 tons of rodenticide on the 284 acre island of Lehua, located off Kauai**.** The rats survived the poison drop. After the following video of dead fish, birds and bait in the water went viral on social media, the state of Hawaii did an investigation.
https://youtu.be/1Q7YGcq5Lh8

Hawaii's Dept. of Agriculture, Pesticides Branch released this 200+ page violation report on the Lehua drop earlier this year. This was released under a public records request from a concerned citizen in Hawaii, who has been researching this industry for some time. This individual had been previously involved in previous island poison drops within the state of Hawaii.
Report comments included - failure to notify HDOA pesticides branch of a large fish kill, wind speed not being recorded, the pesticide label not being in possession of the helicopter pilot, and the helicopter pilot not being properly licensed. There are too many violation notices to include in this document. The linked report provides the detail.
https://drive.google.com/file/d/1-SykJdQhBf-_IEG3LeZA7WuyrtR2NhC9/view?usp=sharing

Wake Island 2012
After a 20 ton poison drop of brodifacoum on Wake Island in the South Pacific, the only inhabitants of the island, the USAF, carried out toxicological testing of the fish for brodifacoum exposure. The same poison that USFWS propose be dropped over the Farallon Islands. After receiving the lab results back, there was a recommendation from the USAF that a 942 day fishing ban be implemented. The email discussion of the findings and recommended fishing ban, released under FOIA, can be found at the following email thread –
https://drive.google.com/file/d/0BwdOUBgcb_baWVd3Y0JhMU14eTA/view?usp=sharing&resourcekey=0-ykP6FyGgh3hc5aRRUMm6Ww

Palmyra Atoll June 2011
During the Palmyra Atoll poison drop, the pounds of poison applied per square acre was five times than what is normally allowed under the EPA label of 22 lbs. per acre. A supplemental label had been granted from the EPA.
Directly from the Final Report (page 2) "Some bait entered the marine environment with areas up to 7m from the shore receiving 14- 19% of the target application rate. Fifty-one animal samples representing 15 species of birds, fish, reptiles and invertebrates were collected for residue analysis during systematic searches or collected as potential non-target mortalities. Brodifacoum residues were detected in most (84.3%) of the animal samples analyzed." The full report can be found here –
https://drive.google.com/file/d/0BwdOUBgcb_baQnF2cXdWSUptbW8/view?usp=sharing&resourcekey=0-NX2ldLXMEFwqUHw3mIxakg

Hawaii's History of Poison Drops – A Presentation in 2009
The following presentation was delivered by Robert Boesch, former Pesticides Program Manager at the Hawaii Department of Agriculture from 1988-2009. This presentation talks about three disastrous poison drops in Hawaii; Keauhou Ranch, Mokapu Island and the first failed drop on Lehua in 2009. Both Mokapu and Lehua resulted in whale beachings that were called an "unfortunate coincidence," and in his presentation, Robert questions the testing methodology used to detect rodenticides in the whales. After the first Lehua drop in 2009, the owner of the nearby island of Niihau complained of hundreds of dead fish washing up on the beach.
https://drive.google.com/file/d/0BwdOUBgcb_baUEpXM01zOXNTZzQ/view?usp=sharing&resourcekey=0-9t7rybpbwBM_9mS2Dot1AQ

Rangitoto & Motutapu Islands, New Zealand 2009
New Zealand's Dept. of Conservation (DoC) dropped brodifacoum over the islands of Rangitoto and Motutapu. The nontarget species killed included native birds, dolphins, fish, penguins and numerous dogs. This New Zealand news station covers the story and in an interview, one can see the evasive response from DoC employee, Richard Griffiths

when questioned if the dolphins were tested for brodifacoum. The response was yes, and the news reporter later confirmed that the dolphins were not tested for brodifacoum. NOTE: Richard Griffiths is currently employed by Island Conservation and was listed as one of the contributing authors to the Final EIS.

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).

Nearly 60% of the Tawharanui Regional Park dotterel (endangered NZ native bird) population died through eating brodifacoum baits and poisoned sand-hoppers (2004); brodifacoum residues continued to be found in wildlife more than 24 months after the brodifacoum poison drop in and around the Rotoiti Nature Recovery Project in Nelson (2005); The Rangitoto and Motutapu Island eradication by-kill included dolphins, penguins, fish, numerous dogs and birds. Vast numbers of dead mussels washed up on Waiheke Island up to five months after the poison drop. Hundreds of dead birds also washed up on Coromandel Peninsula beaches in the months following (2009); More than 10,000 seagulls were killed in Shakespeare Regional Park (2011)"

Fregate Island, Seychelles 2001
The following paper - *The impact of rodent eradication on the larger invertebrates of Fregate Island, Seychelles* discusses how a drop of brodifacoum impacted a variety of invertebrates and is believed to have caused the extinction of one species of snail, C. crenata.
https://drive.google.com/file/d/0BwdOUBgcb_baeU1aX2FOZGNIRWM/view?usp=sharing&resourcekey=0-6vQDOP1OfR8mCw5UvefA9A

Public Comments Processing
California Coastal Commission
455 Market St. Suite 300
San Francisco, CA 94105

Kristie Nelson
19285 Green Dr.
Eunice, MO 65468

Dear Commissioner,

I was fortunate to spend most fall seasons between 2001 and 2015 working with Point Blue Conservation Science on Southeast Farallon Island. The island and its ecology hold tremendous value to me. I was able to observe first-hand many of the troubles associated with the mice: the swarms of them, the number of migrant Burrowing owls, and seeing owl-depredated storm-petrel remains.

I have reviewed the US Fish and Wildlife Service's plan to remove invasive house mice from Southeast Farallon Island and fully support the "preferred alternative" (an aerial broadcast of the rodenticide Brodifacoum) to protect the birdlife and ecology of Southeast Farallon Island. This project is vital to ensure that the tiny, vulnerable global population of Ashy storm-petrel is protected for future generations. I thus urge that you approve the upcoming request for a consistency determination on the Farallon Island mouse eradication plan. It is backed by impeccable science and mitigation efforts.

It is important that action be taken to ensure that the biological diversity present today is preserved into the future. As a lifelong birder, many of my most memorable life experiences involve unforgettable moments with birds in the field. Encountering rafts of storm-petrels at sea is a truly mesmerizing experience. Observing these tiny birds that are so well-crafted for life in turbulent seas – a life so completely different than our own -- is an unforgettable experience. Sadly, many naturalists today are experiencing shifting baselines: much biological diversity around us is shrinking, and future generations are inheriting a world where many natural phenomena are dimming relative to what we encountered in past years or decades. Don't let those rafts of Ashy storm-petrels shrink any further beyond what they are today. Burrowing Owls slowly eroding the Ashy storm-petrel population not only chips away at a threatened species, it dims the concentrations and phenomena of potential experience for young and future generations of naturalists. Long-term delay could cause Ashy populations to dwindle dangerously low for lasting viability as a species. It would be irresponsible to not follow the "preferred alternative" and continue to let the Ashy storm-petrel population dwindle and the island ecology to suffer when the agencies and land managers are armed with the information and ability to eradicate the mice.

I understand there will likely be some incidental mortality of unintended species. Given that it would occur at only one point in time, and in species with more robust population sizes than Ashy storm-petrels, the benefits of this project will clearly outweigh the costs.

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. I recognize the potential impacts but view them as a necessary aspect to achieving the goal of mouse eradication.

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,

Kristie Nelson

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 **2,097** separate contacts:

Stop the Poisoning of the Farallon Islands in California

Dear Energy, Ocean Resources, & Federal Consistency & Federal Consistency,

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 **26** separate contacts:

Rodenticides On Farallon Islands

Dear Coastal Comissioner:

I oppose the US Fish & Wildlife Service plan to drop 1.5 tons of rodenticides on the Farallon Islands. This is an outdated strategy using chemicals that have been banned in California. Better solutions such as contraceptive bait and trapping should be explored and piloted instead so they could be applied to the 200+ other islands off the coast of California that also have mice problems. Your attention to this matter is of the utmost importance.

This item is a form letter sent to the Farallon Islands Consistency inbox from **26** separate contacts:

Farallon Islands

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!

This item is a form letter sent to the Farallon Islands Consistency inbox from 12 separate contacts:

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,
I am writing to strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project. I believe that without this intervention, the Ashy Storm-Petrel will be driven from the island, leading to extinction of the species. 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 the islands. Similar projects, like the rat eradication project on Hawadax Island in Alaska, have successfully restored native bird populations with minimal harm to non-targeted species.

Please help save the Ashy Storm-Petrel and allow the USFW plan to go forward!

This item is a form letter sent to the Farallon Islands Consistency inbox from **8** separate contacts:

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

I am writing to state my opposition to dropping poisons from helicopters as a means of eradicating house mice on the South Farralones island, located in a National Marine Sanctuary.

I understand the need to save endangered species but I fear for collateral damage to other wildlife and contamination in ground water, the air, and sea water.

In some of the comments I read the proponents submitted that the mice would eat the pellets, feel sick and go back to their burrows. What if they don't do that? Say they collapse out in the open and get eaten by burrowing owls, gulls, et al?

I urge you to seek alternate means of securing the future of endangered species without poisoning the mice. After all this is a human problem that has been allowed to escalate by humans to the extent now of putting other species and our fragile environment at risk.

CD-0006-21 (USFWS)

DECEMBER 16, 2021

CORRESPONDENCE:

Individual Emails

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Please eradicate house mice on the Farallon Islands!
Date:	Friday, December 10, 2021 11:26:56 AM

From: Judith Barish <judithrbarish@gmail.com>
Sent: Friday, December 10, 2021 7:26:36 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Please eradicate house mice on the Farallon Islands!

To whom it may concern:

Please approve the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands. Thank you!

Judith Barish
107 Tamalpais Road
Berkeley CA 94708

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 10, 2021 9:52:19 AM

From: Pamela Llewellyn <pamelallewellyn@yahoo.com>
Sent: Friday, December 10, 2021 5:52:13 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)

To whom it may concern,

I strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.

Please take action now, by whatever means necessary, to eradicate rodents from the Farallon Islands.

Pamela Llewellyn
CPESC, QSD, QSP
Stormwater Professional
510-316-8932

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallon mice
Date:	Friday, December 10, 2021 11:13:36 AM

From: Nancy Overton <ostudios@earthlink.net>
Sent: Friday, December 10, 2021 7:13:29 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Farallon mice

Please save the Asahi-Storm Petrel by eradicating the island mice with rodenticide.

Nancy Overton
http://www.nancyovertondesign.com

From: David DeSante
To: Farallon Islands Consistency
Subject: USFWS Plan to eradicate house mice from the Farallon Islands
Date: Friday, December 10, 2021 10:53:23 AM

December 9, 2021

Gentle persons:

I am writing to give my strongest support to the Plan to eradicate house mice from the Farallon Islands, and to urge the California Coastal Commission to approve the Plan.

Allow me to introduce myself. I completed the field work for my Ph.D. research on mirror-image misorientation of vagrant wood warblers (Parulide) on the Farallon Islands during 1969-1971. I was the lead author on the monograph The Avifauna of the South Farallon Islands, California by David F. DeSante and David G. Ainley, published as Studies in Avian Biology No. 4 by the Cooper Ornithological Society in 1980. I subsequently published several additional peer-reviewed papers on on the breeding, wintering, and migrating birds recorded on the Farallon Islands. I am the founder and President of The Institute for Bird Populations, and have been honored as Conservationist of the Year in 2005 by the Western Section of The Wildlife Society. This history qualifies me as an expert on the ecosystem of the Farallon Islands.

The Plan put forth by the USFWS, in conjunction with many partners, for a one-time aerial distribution (two closely-spaced applications) of a special formulation of brodifacoum which has been approved for conservation efforts by the EPA and State of California, would successfully help restore the ecosystem of the Farallon Islands by eradicating the introduced house mouse population. Each summer this mouse population undergoes phenomenal exponential growth which induces autumn migrant Burrowing Owls that arrive from the mainland during September and October to remain on the island through the winter months. The mouse population crashes each winter as its food supply dwindles, forcing the overwintering owls to switch their predation onto the Ashy Storm-Petrels which begin to arrive to breed on the Farallon Islands at that same time. The extent of this predation by owls on the Ashy Storm-Petrel population is significant, as the wings of over a hundred storm-petrels which have been preyed upon by Burrowing Owls are recorded each year over the portion of Southeast Farallon Island that is easily surveyed. The actual annual destruction of Ashy Storm Petrels, however, must be much larger, because most of their preferred nesting habitat in rock crevices on the steep slopes of the island cannot be effectively monitored.

The Ashy Storm-Petrel is listed by the state of California as a Species of Conservation Concern and as Endangered by the International Union for Conservation of Nature (ICUN) in their annual Red Book publication. The Farallon Islands provide the breeding grounds for well over 50% of the entire world's population of the Ashy Storm-Petrel, which has decreased by over 40% during the past 20 years, and whose population decline has been accelerating during the past 10 years. It is long past time to address the annual loss of well over 100 breeding individuals each year from the most important breeding population of the Ashy Storm-Petrel. In addition, the mouse eradication Plan will aid the protection of the endemic Farallon salamander as well as endemic population of the Farallon daisy. Moreover, the mouse eradication Plan has an extremely high probability of success, because similar efforts have successfully been used to remove rodents from over 600 islands worldwide, including on

Anacapa Island, one of the California Channel Islands, off Ventura, CA.

A number of other eradication methods for the house mice on the Farallon Islands have been suggested and considered, but all have been found wanting and likely unable to achieve the total eradication of mice from the Farallones. Eradication of the Burrowing Owls from the Farallones is problematical, because it too is a California Species of Conservation Concern. More importantly, the Burrowing Owls on the Farallon Islands are almost, if not totally, different individuals each year. There are very few, in any, records of Burrowing Owls banded on the Farallones during a given year returning to the island during a subsequent year. Virtually all Burrowing Owls on the islands each year are young birds which have strayed out over the ocean on their first southward migration and have found refuge on the islands. Thus, an eradication program for the Burrowing Owls would have to occur every year, and even then would not be successful, because many of the owls reside at inaccessible locations on the islands.

The use of contraceptive baits would also be unsuccessful for much the same reasons, that bait stations could not be established and serviced over much of the inaccessible areas of the islands, and frequent visits to the bait stations would present additional unacceptable impacts on the nesting seabirds, which the Farallon Islands National Wildlife Refuge was established to protect. To the contrary, the eradication Plan proposed by the California Department of Fish and Wildlife would have no lasting deleterious effects on bird populations on the islands, as any adverse impacts would be short-term and only affect a small number of birds, a few of the Burrowing Owls that exist on the islands during the year of the mouse eradication, and perhaps a few Western Gulls which might eat poisoned mice. The latter case may not actually be undesirable, as the expanding Western Gull colonies on the Farallones have been impinging on the murre and cormorant colonies, and on the auklet burrows and guillemot and storm petrel crevices for some time now, and control measures for the expanding gull population have been discussed.

Finally, the mouse eradication Plan is consistent with the California Coastal Commission's Coastal Zone Management Program, because it will provide important restoration aspects to the ecosystem of the Farallones, as well as to the portions of the ocean ecosystems that benefit from the nesting seabirds on the Farallon Islands. Indeed, a goal of the Coastal Act is "... is protecting, enhancing, and restoring coastal environmental quality and resources..." The house mouse eradication Plan proposed by the USFWS is totally aligned with this important goal. Please take steps to enthusiastically approve this mouse eradication Plan.

Thank you very much.

Sincerely,

David F. DeSante, President

The Institute for Bird Populations

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Opposition to the proposed Farallon poison drop
Date:	Friday, December 10, 2021 10:11:13 AM

From: Mari Tamburo <maritamburo@gmail.com>
Sent: Friday, December 10, 2021 6:09:03 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Opposition to the proposed Farallon poison drop

To Whom It May Concern:

I strongly oppose the proposed rat poison drop on the Farallon Islands. It is a bad idea. You do not need to do this.
There have been numerous reasons stated by educated biologists as to why this is a bad idea and will cause more harm than the supposed good it will do.

Find another way.

Sincerely,
Mari Tamburo

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Farallon Islands
Date:	Friday, December 10, 2021 10:11:13 AM

From: Carolina DePond <cdepond@yahoo.com>
Sent: Friday, December 10, 2021 6:11:04 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: 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. There are other methods to eradicate the problem that should be considered and used.

Carolina DePond

From:	Josh Engel
To:	Farallon Islands Consistency
Subject:	mouse eradication on the Southeast Farallons
Date:	Friday, December 10, 2021 9:53:26 AM

To the California Coastal Commission,

I'm writing in support of the proposed mouse eradication program on the Southeast Farallon Islands. As has been demonstrated repeatedly on islands around the world, using rodenticide is the most effective way to remove rodents permanently from islands. The eradication of rodents is the best way to ensure the long-term health of the ecosystem and the birds and other native animals that inhabit it.

Although I am no longer a California resident, my work as an organizer and leader of birding tours means that I still conduct business in California, and having healthy ecosystems that preserve ecotourism potential around the state are critical to that business.

Sincerely,
Josh Engel
Founder, Red Hill Birding

From:	Amy Carlow
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Thursday, December 9, 2021 8:43:16 PM

To Whom It May Concern,

Please take this important step in saving out birds. Mice can live just about anywhere but this habitat is special for bird populations.

Kind regards and Happy Holidays,
Amy Carlow
(650) 814-5902

From:	Ann Thomas
To:	Farallon Islands Consistency
Subject:	USFWS Mouse Eradication - Support
Date:	Thursday, December 9, 2021 8:43:12 PM

Commissioners:

Re: Consistence Determination No. CD-006-21, USFWS Proposal for So. Farallon Invasive Mouse Eradication Project.

I urge support for the USFWS plan to protect the native ecosystem including protection for rare seabirds for whom this fragile outpost is major breeding ground, and whose survival as species is threatened by the rodent predation.

The Coastal Commission was established with the mission - on your website - of protecting and enhancing California's coast and ocean. Implicit in the mission is, as stated in the Coastal Act, protection of "wildlife...ocean resources, and the natural environment." To not do everything in your power to protect species endemic to the Farallons would be a betrayal of your responsibility.

Thank you for the opportunity to comment.

Ann Thomas
42 Parkview Circle
Core Madera, CA 94925

From:	Barbara Kelley
To:	Farallon Islands Consistency
Subject:	Support for the Farallon Islands Mouse Eradication Plan
Date:	Thursday, December 9, 2021 7:51:54 PM

To whom it may concern,

I am writing to express my complete support for the mouse eradication plan to eliminate mice from Southeast Farallón Island and restore the native ecosystem using rodenticide. This is a most urgent situation and the only solution that will work to save sea birds and other native wildlife and vegetation, greatly imperiled.

Please do the right thing and eradicate these mice.

Sincerely,

Barbara Kelley

From: cary spatz
To: Farallon Islands Consistency
Subject: Agenda Item Th11b-CD-0006-21.
Date: Thursday, December 9, 2021 7:35:46 PM

Members of the Coastal Commission,

I am writing in support of the methods proposed to eradicate the rodents now populating the Farallon Islands. I am aware of this **successful** procedure implemented in other parts of the world, where the islands are not populated with humans.

The importance of the removal of these rodents will allow the abundant birds to flourish and regenerate in their natural habitat, which by the way was not the natural habitat of these rodents. This method will also help the population of marine mammals. The Farallon Islands are

treasure. I support the use of rodenticides in the situation, and trust you will agree this is the best way to ensure the perpetuation of the natural ecosystem we so cherish in the Bay Area and beyond.

Sincerely,

Cary Spatz
Sacramento, Ca

From: Connie Beck
To: Farallon Islands Consistency
Subject: SE Farallon Island
Date: Thursday, December 9, 2021 6:40:19 PM

I absolutely support mouse eradication on this island to protect the Ashy Storm Petrels. We should not lose a beautiful species like this to an invasive rodent!

Connie Beck

Let me live in my house by the side of the road
And be a friend to man.

From: Todd Morris
To: Farallon Islands Consistency
Subject: Supporting mouse eradication on SE Farallon Island
Date: Thursday, December 9, 2021 6:06:08 PM

As a 30 year resident of San Francisco, I am writing to express my support for the proposed eradication of mice on Southeast Farallon Island through the use of bait pellets. The science behind the proposal is solid, and this type of program has been used to great success on islands around the world. Please approve the proposal and aid in the recovery of the native wildlife of this fragile island ecosystem.

Todd Morris
613 Corbett Avenue
San Francisco, CA 94114

From: Mary Ann Allan
To: Farallon Islands Consistency
Subject: Mouse Eradication on Farallon Islands---YES
Date: Thursday, December 9, 2021 5:35:59 PM

To California Coastal Commission,

I strongly support the mouse eradication project to restore avifaunas on the Farallons, especially Southeast Farallon Island. I am an active birder of many years and value the natural resource that is the Farallons. Introduced mammal eradication programs like this one are highly effective. They work! If the mice are not eliminated, the prospects for seabird nesting populations, particularly the Ashy Storm Petrel are dire.

Thank you,
Mary Ann Allan
Los Altos, California

From: Suzy Locke
To: Farallon Islands Consistency
Subject: Rodent eradication on the Farallon Islands
Date: Thursday, December 9, 2021 5:01:54 PM

Members of the Coastal Commission,

I am writing in support of the methods proposed to eradicate the rodents now populating the Farallon Islands. I am aware of the successful procedure implemented in other parts of the world, where the islands are not populated with humans.

The importance of the removal of these rodents will allow the abundant birds to flourish and regenerate in their natural habitat, which by the way was not the natural habitat of these rodents. This method will also help the population of marine mammals.

I support the use of rodenticides in the situation, and trust you will agree this is the best way to ensure the perpetuation of the natural ecosystem we so cherish in the Bay Area and beyond.

Sincerely,

Suzy Locke Cohen
201 Estates Drive
Piedmont, CA 94611

From: A Cross
To: Farallon Islands Consistency
Subject: Support for Introduced Mammal Eradication
Date: Thursday, December 9, 2021 4:52:55 PM

Please support the efforts to remove introduced mice from the Farallon Islands. This is a viable conservation effort. Thank you.

Lois Harter

Sent from my iPad

From: Adam Winer
To: Farallon Islands Consistency
Subject: YES to mouse eradication on the Farallones
Date: Thursday, December 9, 2021 4:49:14 PM

Please, support the eradication of mice on the Farallones.

This proven technique has paid dividends around the world in saving critical habitats from invasive species, and the future of the Ashy Storm-Petrel hinges on this action.

-- Adam Winer
San Francisco, CA

From: sarah warnock
To: Farallon Islands Consistency
Subject: In Support of Mouse Eradication
Date: Thursday, December 9, 2021 3:47:58 PM

To Whom It Concerns,

Please count me in support of mouse eradication on the Farallon Islands. For those who believe the effort is cruel to mice or that there are alternatives, it is clear the most humane methods are being used to eliminate the population, and that a greater magnitude of harm will come to the mice if they are allowed to overpopulate and die of starvation on an annual cycle, year after year. House mice are not endangered; storm-petrels on the Farallones are. I have seen first-hand how successful rodent eradications can restore island bird populations in Alaska and central Pacific, and after learning about the program I believe it will work effectively on the Farallones. In this time of great change it is more important than ever to maintain ocean biodiversity wherever we can, and we can do it on the Farallones.

Sarah Warnock
530.304.4621
sarahewarnock@yahoo.com

From: Alvaro Jaramillo
To: Farallon Islands Consistency
Subject: In support of the mouse eradication project on Southeast Farallon Island.
Date: Thursday, December 9, 2021 2:28:05 PM

Dear Members of the California Coastal Commission.

I am writing as a citizen living in coastal California (Half Moon Bay) in support of the mouse eradication project on Southeast Farallon Islands. I am a biologist, nature tour operator as well as an author (Birds of California, Birds of Chile, New World Blackbirds), and well known birding personality and birding educator. In summer and fall we conduct approximately 40 boat based trips to observe birds and marine mammals from various ports in California, and approximate 10 of our trips are to the Farallon Islands. Of the nearly 600 people we took offshore last year, most of them California residents, there was an overwhelming support of this project. Birders know that the Ashy Storm-Petrel is one of the most restricted ranged of the world's seabirds, and an endemic to the California current system. People realize that the largest colony of this declining species is in the Farallon Islands. Without eradication of the introduced House Mouse, the storm petrel will not continue to thrive on the Farallons. We actively need to restore balance on the island, and the mouse eradication must happen. There is widespread support for this in the biological, conservation, birding, nature tourism, whale watching communities as well as within educated concerned citizens such as my neighbors in Half Moon Bay. We need to have this project go forward, and I heartily throw my support towards mouse eradication.

Thank you on behalf of myself, Alvaro's Adventures, and the thousands of California birders I have contact with.

Alvaro

Alvaro Jaramillo
alvaro@alvarosadventures.com
www.alvarosadventures.com

From: Judith Steenhoven
To: Farallon Islands Consistency
Subject: Support Mouse Eradication on Farralon Islands
Date: Thursday, December 9, 2021 2:23:43 PM

My husband and I are long time bird watchers and have travelled extensively to bird different locations around the world. We have seen the success of other similar programs in other locales. We strongly urge approval of the mouse eradication program proposed for the Farrallon Islands in order to restore seabird populations there.

Sincerely,
Jerry and Judy Steenhoven

From: Erin Lehnert
To: Farallon Islands Consistency
Subject: Support for farallon islands mouse eradication plan
Date: Thursday, December 9, 2021 12:01:51 PM

From:	David Hartgrove
To:	Farallon Islands Consistency
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Thursday, December 9, 2021 11:24:09 AM

Hi,
House mice were transported to the Farallon Islands by mistake and do huge damage to nesting bird species, some of which are federally or state listed under the ESA. Time to corrected that mistake and eradicate them.

David Hartgrove

"If men had wings and bore black feathers, few of them would be clever enough to be crows."
Rev. Henry Ward Beecher

From: Robbie Fischer
To: Farallon Islands Consistency
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Thursday, December 9, 2021 10:02:44 AM

This is a wonderful plan.

Robbie Fischer
Pacifica

From: Craig Strong
To: Farallon Islands Consistency
Subject: Mouse eradication must happen
Date: Thursday, December 9, 2021 7:54:20 AM

Hello esteemed members of the coastal commission.

The house mouse eradication project on SE Farallon Island has been thoroughly vetted and approved by all agencies, and I am asking that the Coastal Commision approve this very unique project for implementation.

The science on methods and success in removing invasive species from island ecosystems is well established. Everyone - and I mean EVERYONE who knows the science and benefits of getting mice off the island is in agreement that this is a good project with a high level of confidence in it's success and clear benefits to endangered Ashy Storm Petrels, whose populating center is the Farallones.

Furthermore, Point Blue Conservation Science and the U.S. Fish and Wildlife Service who manage the refuge are in a unique position to insure the safety of the island wildlife and are extremely dedicated to preventing re-invasion of the island by mice or other mammals.

Coastal Commision permitting is the last hurdle in this long, expensive and carefully planned effort to restore the island for the betterment of seabirds in general and storm petrels in particular.

I worked on the Farallones in the 1970s and early 1980s. House mouse impacts to storm petrels and Cassin's Auklets is real and this project is a real solution.

Thank you for approving this project.

--
Craig Strong
Crescent Coastal Research

From:	Larry Pettinger
To:	Farallon Islands Consistency
Cc:	Larry Pettinger
Subject:	Support for Farallon Islands Mouse Eradication Plan
Date:	Thursday, December 9, 2021 7:25:49 AM

Dear Commissioner,

I'm a native Californian living in Virginia. I earned B.S. (Forestry) and M.S. (Wildland Resource Science) degrees from U.C. Berkeley and had a successful career with the U.S. Geological Survey (specializing in remote sensing, mapping, and resource inventory). My wife and I come to California every year, spending time on the Monterey Peninsula. As long-time supporters of the Point Lobos Foundation, the Monterey Audubon Society, the Nature Conservancy, and other regional and national environmental advocacy groups, I've become familiar with the serious damage that is being done by invasive, non-native animal and plant species throughout California. Many bird species are especially vulnerable to the impacts of invasives.

I recently became aware of the serious threat posed to the Farallon Islands by invasive, non-native house mice. I am writing to request that you approve the upcoming request for a consistency determination for the U.S. Fish and Wildlife Service's plan to eradicate these mice.

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

I've read that the only way to allow the Farallon Islands 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 is commonly known, even a small residual mouse population will recover incredibly quickly.

At present, there is only one known method that has proven effective for island eradications such as this. It is an aerial broadcast of the rodenticide Brodifacoum, the "preferred alternative" identified by the

U.S. Fish and Wildlife Service in its Final Environmental Impact Statement published in March 2019. Other methods such as contraception would require multiple treatments, would have negative side effects, and would not be nearly as effective as the recommended rodenticide.

Please advise me if any of the points I've made in this communication are incorrect.

Also, please confirm that you have received this email and keep me informed about the decision-making process that--if the treatment I'm supporting is approved--could have significant positive impacts on the Farallon Island ecosystem.

Thank you,

Larry Pettinger
133 Elderberry Drive
Winchester, VA 22603

pettinger1@verizon.net

From:	Pamela King
To:	Farallon Islands Consistency
Subject:	Farallon Island House Mouse Eradication
Date:	Thursday, December 9, 2021 6:02:18 AM

Dear Commissioner,

I am writing to request that you approve the US Fish and Wildlife Service's (USFWS) plan to eradicate the invasive, non-native house mouse species from the Farallon Islands. The Farallones host the largest seabird breeding colony in the contiguous United States and 25 percent of California's breeding seabirds (more than 300,000 individuals of 13 species).

The house mouse has caused significant disturbance to the Farallon Islands' sensitive ecosystem. The house mouse has proliferated to the point that the Farallones have the highest density of this species of any place on the planet (more than one per square foot). The house mice eat seabird eggs and spread the seeds of non-native weeds. They have been massively destructive to the Farallones' breeding seabirds, particularly the rare and endangered ashy storm-petrel. They have also been harmful to native salamanders, crickets and other invertebrates, and native plants.

For the ecosystem to recover, the house mouse must be eradicated 100 percent. The survival of even a single pair of mice means the house mouse population could rebound quickly. The USFWS's plan to use rodenticide bait pellets is based on more than a decade of careful study, published in its Final Environmental Impact Statement (March 2019).

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

Sincerely,

Pamela King, Santa Cruz, CA

From:	Richard Charter
To:	Teufel, Cassidy@Coastal; Energy@Coastal; Farallon Islands Consistency
Subject:	CD-0006.21: please enter this short video into the record and the staff packet
Date:	Wednesday, December 8, 2021 8:39:40 PM

How Anticoagulant Rodenticide Ecosystem Impacts Work, a short 2-minute video:

https://www.youtube.com/watch?v=RyGBg7y5CFw

Thank You,

Richard Charter

From:	Rachel Haxtema
To:	Farallon Islands Consistency
Subject:	No drop!
Date:	Wednesday, December 8, 2021 7:27:47 PM

As a mother, a person of faith and an ethicist, I'm asking the commission to stop the plan to poison the mice on the Farallon islands.

It is not moral or ethical to add known toxics to our fragile ecosystem. This will only further our ecological challenges and harm sensitive habitats and sea birds and sea life. There are options for comprehensive nontoxic strategies that would be much better choices.

As has been reported: "38% of the initial aerial applications of this same brodifacoum rodenticide bait during eradication efforts to control mice on islands have failed to eliminate the mice entirely. Recurring poison applications are often tried during the following years."

Repeated poisoning of the ecosystem is not the answer. Please find other options.

Rachel
510-292-7271

From: Steve Hampton
To: Farallon Islands Consistency
Subject: in support of good science and island restoration
Date: Wednesday, December 8, 2021 4:35:00 PM

As the former Deputy Administrator for the California Department of Fish and Wildlife's Office of Spill Prevention and Response, I write in **support** of the plan to eradicate the non-native house mouse from Southeast Farallon Island.

Over 500 rodent eradications on islands like Anacapa and the proposed Farallones project have been implemented worldwide, literally saving many seabird species and other island endemics from extinction.

In 2006, I was part of the Luckenbach Oil Spills Trustee Council. Together with our partners, the United States Fish and Wildlife Service (USFWS), the National Oceanic and Atmospheric Administration (NOAA), and the National Park Service (NPS), we proposed this project in a draft restoration plan as a way to restore seabirds impacted by the oil spills. Hearing only positive public comment at the time, we approved this project and proceeded to fund over $800,000 for some of the early research and studies.

Years earlier, the same agencies had partnered to eradicate the non-native black rat from Anacapa Island. That project was wildly successful. In my 20 years of service involved with over 300 restoration projects, the Anacapa rat eradication was the most successful and beneficial. The island and its species – from the birds to the intertidal sea stars and mussels to the lizards and the vegetation – are now vibrant and thriving. The rats had been impacting them all. It was not until we removed the rats that we really realized all of the detriment they were causing.

It is no surprise that experts in restoration ecology and ornithology overwhelmingly support this project. Here is a list of supporters:

- National Audubon Society
- Audubon California
- American Bird Conservancy
- BirdLife International
- The Nature Conservancy

- California Native Plant Society
- California Invasive Plant Council
- California Academy of Sciences
- California Institute of Environmental Studies

- David Ainley; author of *Seabirds of the Farallon Islands*; Ashy Storm-Petrel species account in *Birds of North America*
- Peter Pyle; Institute for Bird Populations; author of *Identification Guide to North American Birds* and over 100 journal articles
- Mark Rauzon, Marine Endeavors; author of *Isles of Amnesia: The History, Geography, and Restoration of America's Forgotten Pacific Islands*.
- Hadoram Shirihai, Tubenoses Project; author of *A complete guide to Antarctic wildlife: the birds and marine mammals of the Antarctic continent and the Southern Ocean; Whales, dolphins and seals: A field guide to the marine mammals of the world*; *The Macmillan birder's guide to European and Middle Eastern birds*.
- Debi Shearwater, Shearwater Journeys, 44 years of offshore experience; co-author of *Distribution patterns and population size of the Ashy Storm-Petrel*
- Dianne Feinstein, US Senator

- Point Blue Conservation Science (formerly Point Reyes Bird Observatory)
- Institute for Bird Populations
- Pacific Seabird Group
- Agreement on the Conservation of Albatrosses and Petrels
- Island Conservation
- Oikonos

- Oiled Wildlife Care Network
- International Bird Rescue

- Golden Gate Audubon Society
- Marin Audubon Society

- Monterey Audubon Society
- San Diego Audubon Society
- Sequoia Audubon Society

- Marin County Supervisor
- Santa Cruz County Supervisor
- National Refuge Association
- Save the Bay
- Farallon Islands Foundation
- Citizens Committee to Complete the Refuge
- Coastal Conservation Action Lab
- Freshwater Life
- Marin Conservation League
- Marine Endeavors
- Natural Heritage Institute
- South Georgia Heritage Trust

Sincerely,

--
Steve Hampton
Former Deputy Administrator, CDFW-OSPR (retired)

From: Alison Hermance
To: Energy@Coastal; Teufel, Cassidy@Coastal; Farallon Islands Consistency
Subject: Resubmitting for CD-0006-21 record
Date: Wednesday, December 8, 2021 2:31:26 PM

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

Alison Hermance | Director of Communications and Marketing
discoverwildcare.org | 415.453.1000 x24

--

Alison Hermance | Director of Communications and Marketing
discoverwildcare.org | 415.453.1000 x24

From:	Megan Kaun
To:	Teufel, Cassidy@Coastal; Energy@Coastal; Farallon Islands Consistency
Subject:	For the record on CD-0006-21 / Farallones
Date:	Wednesday, December 8, 2021 12:20:13 PM

Dear Coastal Commission,

Please see that these words go on record. For more information on my organization's position and a video of the Lehua Island rodenticide drop, please see our website: www.SonomaSASS.org/farallons

I would like to propose that the Coastal Commission deny the USFWS's application and suggest instead that the USFWS use the Farallones Islands as a pilot study to test some of the newer, safer methods of controlling rodent populations, for example contraceptive bait. There are over 250 other islands off the coast of California listed as having "urgent" rodent problems according to Point Blue/Island Conservation. This problem is not going away, why not provide the Farallons and all the islands off the State of California the respect of trying something new instead of following an outdated 1950's poison playbook. It is well known that these 2 organizations (Island Conservation/Point Blue) stand to make a lot of money from a sole source contract if this plan is approved; and they don't plan to stop with the Farallon Islands.

The Farallon Islands are also known as the Islands of The Dead, part of ancient pathways still tended by the Miwak, Oholone, and other First nations as sacred. We give lip-service to upholding and protecting indegienous values and sacred sites, but when they are in our backyard it's easy to turn a blind eye in the name of progress. You don't have to travel to far off lands to witness the deep esoteric and spiritual traditions of indigenous peoples. They are literally in our backyard and they are constantly under attack, mostly through a refusal to believe they exist. The proposal to drop 1.5 tons of banned rodenticides on the Farallon Islands, the sacred Islands of the Dead, would be one more wound imposed on sacred lands of our First Nations. Read this article, open your eyes, and share what you see. https://www.ptreyeslight.com/.../tomales-point-rocks.../

Video footage shows the deadly aftermath of a similar rodenticide drop on Lehua island near Kauai in Hawaii. During the poison applications incidents of Pilot Whale beachings were observed. After a similar poison drop on Wake Island, US Air Force scientists recommended a 3 year fishing ban after testing fish for brodifacum, the same rodenticide

planned to be dropped on the Farallons, the same rodenticide banned on the California mainland due to its detrimental impacts to ecosystems. It is not yet well understood how this rodenticide impacts food webs especially in non lethal doses. At Wake Island, fish tested 3 years after the poison drop still contained residues. Because these types of rodenticide drops occur exclusively on islands there is little oversight and public visibility.

The argument is that rodenticide drops are the way mice and rats have been eradicated from islands in the past, it's true that poison drops are the oldest method. But just because this is the way it's been done for a while doesn't mean it's the best. Gas vehicles are the most proven form of transportation but we know we need to switch to electric. Coal plants are the most proven way of producing electricity but we know we need to move to use more solar and wind. Dropping literally tons of rodenticides on islands has been the way rodents have been removed from islands in the past, but it doesn't mean we should keep on doing it, especially off the coast of California.

"Humankind has not woven the web of life. We are but one thread within it. Whatever we do to the web, we do to ourselves. All things are bound together. All things connect."
- Chief Seattle, 1854

"Native American beliefs include that all of nature is sacred and alive, has inherent right to exist, and is perpetuated in a sensitive, dynamic balance. If we intervene harshly and disrupt that balance, we risk its peril and ours."

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

Respectfully,
Megan Kaun
Director
Sonoma Safe Ag Safe Schools

From: Judith Barish
To: Energy@Coastal
Subject: Please eradicate house mice on the Farallon Islands!
Date: Friday, December 10, 2021 11:26:55 AM

To whom it may concern:

Please approve the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands. Thank you!

Judith Barish
107 Tamalpais Road
Berkeley CA 94708

From:	Pamela Llewellyn
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 10, 2021 9:52:18 AM

To whom it may concern,

I strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.

Please take action now, by whatever means necessary, to eradicate rodents from the Farallon Islands.

Pamela Llewellyn
CPESC, QSD, QSP
Stormwater Professional
510-316-8932

From: Andrew David
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Thursday, December 9, 2021 10:03:00 PM

I support the Mouse Eradication Project!!!

As a high-school environmental science teacher, I implore my students to look for the "big picture" instead of the small details. While others may scoff at the idea of poisoning mice, the big picture here is clear. The mouse population is out of control and cannot be managed with a laissez-faire attitude. The birds serve a far greater purpose in the ecosystem and the relatively small monetary and resource expenses are a small price to pay for restoring a more balanced ecosystem.

Andrew David
The Athenian School, Danville, CA

From:	Zoe Burr
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 9:58:16 PM

I am in full support of the mouse eradication project. The science has shown that the benefits of removing invasive mice far outweigh any short term costs. I urge you to make the science-based choice to protect our wild places and its inhabitants.

Zofia Burr

From:	Christopher Reiger
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 7:58:38 PM

Dear California Coastal Commission members,

I'm writing today to ask the Commission to grant a consistency determination during the December 16 Commission meeting for the South Farallon Islands Invasive House Mouse Eradication Project.

Contrary to the appeals of those groups claiming that targeted use of rodenticides will result in unacceptable mortality among non-target species, the method in question has been used with great success (and limited mortality outside of the target species) on other islands. Additionally, it is my understanding that the US Fish & Wildlife Service has tailored the method for the Farallons to further reduce unnecessary harm to other wildlife on and around the islands. Although the primary motivation for advancing the plan is protection of the endangered Ashy Storm-Petrel population, the removal of rodents on the Farallon Islands will be of general benefit to the island ecosystem.

Thank you for your time,
Christopher

•••••
Christopher Reiger
www.christopherreiger.art
@christopherreiger

From:	Allison Levin
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 6:19:06 PM

To the Commission:

I'm writing in support of the USFW mouse eradication project.

I hope you will grant a consistency determination for this plan, keeping our Ashy Storm-Petrel population safe and restoring the ecosystem of the Farallon Islands. While I know that Rodenticide is something that we almost never want to use, I agree that the described use in this case is warranted.

Thank you for your consideration.

Sincerely,

Allison Levin

258 Glen Dr., Sausalito, CA 94965

510-292-9484

From: Ernst Karel
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Thursday, December 9, 2021 5:41:26 PM

To whom it may concern:

I live on the coast of Marin in Muir Beach, nearly in view of the Farallons. It is very difficult to imagine that carpeting the island with toxic poison could possibly be isolated to just the targeted population of mice. It is very difficult to imagine that there would not be unforeseen consequences with this kind of deadly intervention into a complex ecosystem. How often have human beings been shortsighted in contemplating such interventions? The answer is: most of the time.

My opinion is that the author of this editorial in the Marin IJ presents a very compelling argument, and I oppose this use of poison. Surely there is another way.
https://www.marinij.com/2021/12/08/marin-voice-farallons-poison-drop-would-put-bay-area-wildlife-at-risk/

Thanks,
Ernst Karel
15 Muir Beach Overlook
Muir Beach CA 94965

From:	Charlotte Nolan
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 5:28:31 PM

I want to express my support for the USFW South Farallon Islands Invasive House Mouse Eradication Project. The eradication plan is based on sound scientific principles and has proven in other settings to not impact other wildlife or cause environmental degradation or damage.

According to study and analysis by respected science-based groups such as Point Blue Conservation Science and the Golden Gate Audubon Society this eradication plan is the only means by which to ensure revival of and continuation of certain sea birds such as the Ashy Storm-Petrel.

I write as a local Bay Area resident, concerned advocate for conservation and environmental protections and member/supporter of several environmental organizations which support this eradication project, asking that you grant the project a consistency determination.

Charlotte Nolan
Berkeley, CA

From:	Megan Prelinger
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 4:10:05 PM

Dear Commissioners,

This letter is to express support for the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.

While no ecologically minded person takes lightly the issue of rodenticide, it is a preferable alternative to extinction! The stakes are no less than this. The Farallons are critical habitat for a small, population-critical breeding group of Ashy Storm-Petrel, and critical habitat for other species that are only slightly less close to extinction.

The mice on the islands are a man-made problem that demand this one-time man-made solution. Research shows that one-time use of rodenticide will not accumulate or cause long term harm. Research also shows that allowing the mouse population to persist will result in extinction and many other harms to beleaguered wildlife.

Please don't let the naysayers win this one: Extinction will be the result.

thank you,
Megan Prelinger
San Francisco

From:	Ellen L
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 3:58:22 PM

I am writing as a friend of the Golden Gate Audubon Society, a friend of oceans and seabirds, and a pelagic bird aficionado to ask that the commission grant a consistency determination for this plan, to help in keeping our Ashy Storm-Petrel population safe and restoring the ecosystem on the Farallon Islands.
Thank you,
Ellen Leng, MD

From:	Marlie de Swart
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 3:40:01 PM

Please do not dump poison on an island to kill the rats. It will kill so many other creatures as well and pollute the ocean waters.
Please use a different method, like birth control, to eradicate the rates.

From:	Oliver Kay
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 3:04:50 PM

Good day,

Due to the ecological imbalance created by human introduced house mice on the Farallon Islands National Wildlife Refuge, the endangered Ashy Storm-Petrel, amongst other wildlife, are in particular peril. Without intervention, the Ashy Storm-Petrel will be permanently extirpated from the island, leading to the extinction of the species.

Therefore, I strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.

Thank you for your consideration;

Best,

~ok~

Oliver Kay
Oakland, CA
94611

ollie_kay@hotmail.com

If you have a garden and a library, you have everything you need.
--Cicero.

From:	Sandy
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 2:35:23 PM

Dear Commissioners,

I am very concerned about the the threat to Ashy Storm-Petrels on the Farallon Islands. I'm asking you to grant a consistency determination for this plan to keep our Ashy Storm-Petreal population safe, and to restore the ecosystem on the Farallons.

Thank you,

Sandy Thacker

Member, Golden Gate Audubon Society

From:	Marshall Dinowitz
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 11:37:59 AM
Attachments:	clip_image002.png

Dear California Coastal Commission,

We, the Board of the Sequoia Audubon Society, the local Audubon Society organization in San Mateo County, CA, are writing to you in support of the proposal by the U.S. Fish and Wildlife Service to eradicate the invasive non-native house mouse on the Farallon Islands. The house mouse was introduced to North America in the 1600s, and did not occur on the Farallon Islands until introduced by humans. As discussed in the 2019 Farallon Islands National Wildlife Refuge, South Farallon Islands Invasive House Mouse Eradication Project, Final Environmental Impact Statement, the house mouse densities on the South Farallon Islands are extremely high, and adversely affecting the nesting seabirds. These seabirds depend on nesting islands. The proposed project is designed similar to the methods that have been used successfully in numerous other islands with invasive mice that have endangered species on those islands, where island habitats have now been largely restored to enable the birds and other wildlife to better survive.

The U.S. Fish and Wildlife Service proposal is consistent with the goals of the California Coastal Plan to protect sensitive species and habitat. We strongly urge the California Coastal Commission to approve the U.S. Fish and Wildlife Service Invasive House Mouse Eradication Project. The substantial benefits to the South Farallon Island seabird population and ecosystem clearly outweigh any potential detrimental effects of the proposal. We believe successful implementation of this project will alleviate the enormous negative impact of the extremely dense population of non-native house mouse on the ecology of the South Farallon Islands.

Respectfully submitted,
Sequoia Audubon Society Board

Jennifer Rycenga, Chair

From:	jmscardina@aol.com
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 11:28:26 AM

Dear Commissioners,

As a Bay Area resident and scientist concerned about our diverse wildlife and delicate ecosystems, I am writing to implore you to find a better solution for controlling the mouse population on the Farallon Islands than using Brodifacoum. Anticoagulant rodenticides persist in an ecosystem and can have secondary effects on species other than the targeted rodents. It seems tragic that other species, such as migratory birds that ingest contaminated rodents will suffer from this tactic. I know that the mouse overpopulation is an environmental disaster, but harming other wildlife in addressing this problem seems like a horrible solution. It can't be said that there were unanticipated consequences to this approach, when there is evidence that bad consequences ARE expected. Please continue to evaluate alternate solutions and not pass the proposal to use rodenticides.

Thank you for your caring consideration.
Jan Scardina

From: Nancy Overton
To: Energy@Coastal
Subject: Farallon mice
Date: Friday, December 10, 2021 11:13:35 AM

Please save the Asahi-Storm Petrel by eradicating the island mice with rodenticide.

Nancy Overton
http://www.nancyovertondesign.com

From: Ariane Eroy
To: Energy@Coastal
Cc: Ariane Eroy
Subject: Formal Commentary: Opposing USFW"s Proposed Plan to bomb the Farallone Islands with Rodenticide
Date: Friday, December 10, 2021 10:50:49 AM

Dear California Coastal Commission:

The Federal, State, and local governments have long been compromised by the **undue influence of corporate lobbyists**, posing as brokers for largely unregulated corporations, that effectively delay imperative, yet strenuous or unwanted, changes to our society. By deviating, disempowering, or even deceiving elected officials far afield from the most urgent and important issues of our time, special interest groups have propelled our society far astray from many of its most noble and highest goals. In Sacramento alone, there are over 1800 registered lobbyists [See John Meyers, Sacramento Bureau Chief's December 4, 2016 article in *The Los Angels Times*]. In 2019 alone, corporations and special interest groups spent over $300 million dollars to influence government decisions in Sacramento, in the first 9 months alone [See John Meyers, Sacramento Bureau Chief's, November 4, 2019 article in *The Los Angels Times*].

Our nation has too long prioritized economic activity, GDP, and development over regulation, human rights, and, as of yet, the unexpressed Rights of Nature. While decarbonization and de-growth should have been the chief goals of COP26, world leaders spoke in mostly aspirational ways, or claimed that there was "no other alternative" to the present life-style First World Nations enjoy.

The World waited breathless for two weeks to learn of the treaties signed at the COP26 proceedings--only to have our greatest hopes dissolved into consternation and horror. I want to remind you of how **the forces of commercialization can contaminate even the best political interventions**, and thus delay, or even deter Americans' most noble tendencies, including our willingness to sacrifice our current comfortable life-style, merely so others can live! In fact, *Global Witness* wrote, in its "Analysis of UN's Provisional List of COP26 Named Attendees", "If the fossil fuel lobby were a country delegation at COP it would be the largest, with 503 delegates—two dozen more than the largest country delegation" ["The Greenwashing of COP26: Fossil Fuel Lobbyists Make Up Biggest Delegation at U.N. Climate Summit", *Democracy Now!*, November 8, 2011, https:// http://www.democracynow.org]. One must ask: Why then would we consider the fossil fuel industries to be honest power-brokers or environmental advocates now, after 40 years of climate denialism?

Greta Thunberg underscored, "The leaders...are actively creating loopholes to benefit themselves...To stay below the targets set in the Paris agreements, and thereby minimizing the risks of setting off irreversible chain reactions beyond human control, we need immediate, drastic, annual emission cuts, unlike anything the world has ever seen... Our remaining CO2 budgets... will be gone within the end of this decade...And it is very naive of us to think that we could solve this crisis without addressing the root

cause of it." ["COP26 Is a Failure": Greta Thunberg Condemns U.N. Climate Summit as a "Greenwash Festival", *Democracy Now!*, November 8, 2011, https://www.democracynow.org].

Like many Americans, I have deep concerns about the State and Federal Governments' environmental projects going forward. For example, **corporate influencers and ideologues are presently esconced on the Farallones themselves, where *Point Blue Conservation* has been offered an outpost on Southeast Farallone Island.** Such island conservation [sic] groups purport the use of deadly poisons as a means of eradicating unwanted species, while at the same time dismissing the interconnectedness of all life, and the vulnerability of the entire food chain when land, water, and air are allowed to be contaminated. (For example, a similar group, called *Island Conservation* has already promoted 350 poisoning projects on islands worldwide (while hiding that the the fact that the failure rate for mice eradication is 38% [Richard Charter, Senior Fellow with the Coastal Coordination Program of The Ocean Foundation, personal communication, October 5, 2021]).

This special interest group is presently lobbying the US Fish and Wildlife Service to conduct a 1.5 ton aerial drop of rodenticide on the Farallone Islands. Such a poison bombing would not merely impact the Islands' mice, the burrowing owls residing there, and the endangered Ashy Storm Petrel that the toxic intervention claims to protect, but also impose a slow, excruciating death by Brodifacoum poisoning on the dolphins, the sea lions, the humpback whales, as well as the fish that the birds, sea mammals, and fish Californians feed on. **Inevitably, if this proposed project is approved, rodenticide will contaminate not merely the Islands, but the San Francisco Bay and coastal ocean waters. It will make the Pacific Ocean unsafe for surfers and bathers, up and down the California Coast. It will wash up thousands of birds onto the seashore reminding recalcitrant politicians, local residents, and tourists alike of Humanity's over-reach. It will make the fish inedible for years** [See http:// poisonfreesanctuary.org/wp-content/uploads/2021/04/ ourpoisonfreesanctuary_book.pdf]. And yet the islands are deemed to be protected as the "Greater Farallones National Marine Sanctuary".

Recently, Governor Newsom launched the 30x30 Initiative: The premise underlying the Executive Order N-82-20 is that wild-lands need protection, and thus these coastal lands cannot be stripped of life. Moreover, the proposed aerial bombardment would occur on lands long held sacred to the Coast Miwok and Ohlone Peoples, who conceive of these lands as places where their ancestors' spirits travel directly after their death [See: http://poisonfreesanctuary.org/wp-content/uploads/ 2021/04/ourpoisonfreesanctuary_book.pdf.]. Such a proposal thus ignores the Executive Order's stated commitment as regards to honoring the values and insights of California Native American tribes (N-82-20, No. 1).

In sum, the USFWS does administer these islands, forcing San Franciscans, local indigenous peoples, our elected officials, and Californians, in general, to struggle to find a means of protecting the Farallones, even though these islands have already been designated as a marine sanctuary. **Yet both the Federal Government and the**

State have already slated the Sanctuary for protection, not an indiscriminate poisoning, not merely by categorizing it as a Marine Sanctuary but also under (EO) N-82-20, which states: "In developing this Strategy, agencies shall be guided by the following principles: Promote healthy lands that provide multiple benefits including improved air quality, reliable water supply, thriving communities, and economic sustainability" [6.a].

The second issue I hold against *Point Blue Conservation* is ideological, as *Point Blue* is an organization that promulgates Nativism (and, correspondingly, pesticide usage). Note well: One day, very soon, Nativism will be denounced as not merely nostalgic, fundamentalistic, and reactionary, but as unscientific and sorely misguided.

Nativists, however, argue for the supremacy of certain species, and as such, nativism must be considered a form of eugenics. Employing the same bigoted tropes that were used against Native Americans and immigrants for centuries, Nativists denigrate certain species, denouncing them as "non-native", insisting that they "do not belong here", that they are "dirty", or "proliferating without end", that they are "invasive" and thus "dangerous". This is clearly an act of projection, if one considers that human action has rendered over 68% of all species extinct since the 1970s [See: https://www.cbc.ca/ news/science/living-plant-wwf-2018-1.4882819].

Nativists deny the fact that all species and all ecosystems are changing, living systems; all life forms have a meaning and a purpose. Diverse life forms, in essence, are evolving, sentient beings. While Darwin's ideas about evolution as a drive for not merely survival but also for balance, homeostasis and self-improvement have been largely known and increasingly accepted by educated peoples world-wide since 1859, Websters dictionary equates intelligence with the capacity to adapt to changing circumstances. Let it be known!

Moreover, when Nativists argue for the liberal use of pesticides, they deny that their actions are accelerating and intensifying climate disruption. As such, Point Blue Conservation's presence on the Farallone Islands creates too much of an opportunity that environmental planning will be corrupted moving forward. As such, it is necessary that such an organization, which might be considered a front for the pesticide industry, be disallowed from ensconcing itself on the Islands, considering that governmental bodies have committed to being fair and neutral, and have a duty not merely to protect tax payers' monies but also to abide by the precautionary principle. In sum, the probability is too high that ***Point Blue Conservation* is** exercising undue influence over the State and Federal Government, despite the Public's opposition, and as such, it will be a corrupting influence, for example, as **Point Blue Conservation** does partner with the rodenticide industry and does promulgate eugenics.

Finally, I need to question the idea of jurisdiction in this case: The Farallones are located in District 1 of San Francisco where I work and live; they comprise part of California's coastal lands; and they are administered by the Federal

Government's US Fish and Wildlife Service. At present, traditional ideas about jurisdiction are not viable when considering climate chaos, for radical environmental disruption fails to respect: physical borders or boundaries; the responsibilities and rights claimed under singular jurisdictions; diverse, sprawling, terra-forma; confined bodies of water, or even human lives.

When we nurture a connection with the natural world, we come to understand our interdependence with all living beings. **Only by considering ecosystems as interlocking living tissue that does not correspond to borders, unique jurisdictions, or singular domains of research, will we create true, reparative, humane models of change.**

But because of Americans' historically ruthless relationship to the plant and animal world, within an economy that deems profits as guiding principles, our governments have been reticent, if not derelict, in recognizing the force of climate disruption over the past 40 years. Despite the fact that Congressional Hearings on this subject began with Rachel Carson's testifying about pesticide toxicity before the Senate in 1963. The problem of environmental poisoning stem not merely from Human recklessness, complacency and greed but also a lack of political will. In the face of Americans' dearth of moral rectitude, we need to protest as well as to envision a different kind of future. But by "doing too little, too late", all life is endangered now. As such, **the State of California has a moral responsibility and obligation to advocate across all jurisdictions.**

Present models of justice, however, place an undue burden on ordinary citizens, who lack adequate monies or the capacity to monitor and confront diverse public and private agencies, organizations, and institutions because such entities have access to lawyers while their operations are largely clandestine. Most citizens are unable to fight for their own rights, let alone for the maintenance of the Commons, through legal means. As such, separative government agencies, whether local, state or national, cannot be allowed to enact decisions merely within singular jurisdictions or in silos, by claiming exclusive rights over jurisdictions that, nonetheless, permeate various land bodies and moving waters. Moreover, the Public's interests and values must be understood as inclusive and overlapping, rather than exclusive or conflictual. The primacy of understanding that the intersecting webs of relationships supersede borders, and far outstrip so-called private property rights and materialistic pursuits on a planet of finite resources, is of utmost importance now.

A**s systems are recognized as increasingly complex, we are compelled to accept additional perspectives, stricter moral codes, and better structured or layered principles. Within new systems understanding, in fact, comes the necessity of a new world view, one that recognizes the Planet's underlying reality, a conscious reality in which meaning-making is actually a function of the interconnectedness of all, sentient life** (Jeremy Lent, The Web of Meaning: Integrating Science and Wisdom to find our place in the Universe, *Share International Live*). **As Climate Disruption is the most urgent and important issue of our time, we thus must recognize that the old, unconscious, and thus reckless**

enterprises of the past must be abandoned and condemned, so that we can affirm, discover, and make manifest a truly healthy, sustainable world.

Sincerely yours,

Ariane Eroy, Ph. D
716 20th Avenue
San Francisco, CA 94121

From: Mari Tamburo
To: Energy@Coastal
Subject: Opposition to the proposed Farallon poison drop
Date: Friday, December 10, 2021 10:11:13 AM

To Whom It May Concern:

I strongly oppose the proposed rat poison drop on the Farallon Islands. It is a bad idea. You do not need to do this.
There have been numerous reasons stated by educated biologists as to why this is a bad idea and will cause more harm than the supposed good it will do.

Find another way.

Sincerely,
Mari Tamburo

From: Carolina DePond
To: Energy@Coastal
Subject: Farallon Islands
Date: Friday, December 10, 2021 10:11:11 AM

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. There are other methods to eradicate the problem that should be considered and used.

Carolina DePond

From:	Kristine Karnos
To:	Energy@Coastal
Subject:	Normally against rodenticides but not for this unique case
Date:	Thursday, December 9, 2021 8:00:01 PM

Hello,

Much as I am normally against the use of rodenticides, I've become convinced that they are the right solution for the terrible cycle that is happening in the Farallones and wiping out ashy storm petrels. Some of the most environmentally-minded people I know, some of the biggest environmental organizations who keep the wellbeing of wildlife and wild environments as their core value, have by their support and arguments convinced me that this is unfortunately the action that is needed to address a terrible situation.

Please take action to break the terrible cycle on these islands, so that the natives have a chance. I've visited islands in New Zealand and Australia where rodent eradication (and continued monitoring) on islands was the ONLY chance for bird species survival. There are precedents... let's please learn from them.

Thank you
Kris Karnos
San Jose, CA

From: Simone
To: Energy@Coastal
Subject: Public comment on Thursday agenda item 11-B CD 0006-21 San Francisco Fish and Wildlife
Date: Thursday, December 9, 2021 7:57:56 PM

Please do not fumigate our natural resources at the Farallon Islands with any type of pesticide!!!
Simone Adams
Mill Valley CA

From: Tom Colton
To: Energy@Coastal
Subject: Supporting mouse eradication on the Farallon Islands
Date: Thursday, December 9, 2021 7:31:58 PM

Dear Coastal Commission,

I support the use of rodenticide to eradicate mice on the Farallon Islands. I'm impressed at the extensive research and review of this matter and disappointed at the misinformation that has been circulated by opponents to this project.

Tom Colton, Ph.D. in Zoology

--
Tom Colton
1515 North Street
Berkeley, CA 94703

From: Melani King
To: Energy@Coastal
Subject: house mice on the Farallon Islands
Date: Thursday, December 9, 2021 7:02:51 PM

I support the US Fish & Wildlife Service plan to eradicate the invasive house mice on the Farallon Islands. I normally am opposed to the use of rodenticides but this is a special case.

Sincerely,
Melani King
Pt. Richmond, CA

From:	Margie Cohea
To:	Energy@Coastal
Subject:	"Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)"
Date:	Thursday, December 9, 2021 6:33:14 PM

Dear Commission,

I am writing to you to request that you support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project & grant a consistency determination for this plan, keeping our Ashy Storm-Petrel population safe and restoring the ecosystem on the Farallon Islands.

Sincerely,
Margie Cohea

From:	Jon Altemus
To:	Energy@Coastal
Subject:	"Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)"
Date:	Thursday, December 9, 2021 2:58:13 PM

To whom it may concern,
I strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.
Please do what ever you can to facilitate the Invasive House Mouse Eradication Project.
Thank you,
Jon Altemus

From: Leslie Laurien
To: Energy@Coastal
Subject: Mice on Farallons
Date: Thursday, December 9, 2021 5:07:21 PM

Hi,
I'm a concerned resident of Stinson Beach and Oakland, California and I would like to have every measure taken to preserve the wonderful bird populations on the islands.
Appreciate your action on this.
Sincerely,
Leslie Laurien

From: Robin Banks
To: Energy@Coastal
Subject: Farallon mouse problem
Date: Thursday, December 9, 2021 5:03:35 PM

Re: Agenda Item Th11b-CD-0006-21

Hi there,

Please approve the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands. While I am generally against rodenticides, I understand how the Farallons are a special case. I trust that the implementation will be closely monitored, and support the USFWS mouse eradication plan.

Thank you,
Robin Banks
Mountain View, CA

From:	Christina Tarr
To:	Energy@Coastal
Subject:	Eradication of house mice from the Farallones (Agenda Item Th11b-CD-0006-21)
Date:	Thursday, December 9, 2021 4:36:52 PM

I am writing concerning the use of rodenticides to eradicate house mice from the Farallon islands. Although I am not generally in favor of rodenticides, I am 100% in favor of the use of rodenticides in this special case.

I am appending a compelling description of the issue writen by Golden Gate Audubon's former communication director, Ilana deBare (see below), but I would also like to add a few words of my own.

Islands are special habitats, where the interplay of existing species have developed over millennia. In an environment where birds have evolved without rodents, and without a resident raptor population, the breeding strategy for the Ashy Storm-Petrel was successful. Once humans introduced mice, they were no longer successful. If we wish the island's ecosystem to continue in the way it evolved, we need to remove the problem that we caused when we brought mice to the island. I am in favor of the preservation of the special places on earth. I am also in favor of the preservation of species when we can easily do something to make that happen. I don't like rodenticides, but much experience has shown that rodenticides, in the case of a non-native introduced rodent population, are the best way to restore an island to its natural balance.

There has been an incredible amount of research into and practice at ridding islands of invasive rodents. Some early attempts went awry, but scientists have learned from each attempt, and the science is now very sound -- using rodenticides is the best and safest way to go. Please allow the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands to go forward. It is the safest and best way to save the Ashy Storm-Petrel, which if this plan is not deployed, will quite likely no longer exist.

Thank you for your consideration,

Christina Tarr

1512 Spruce St

Berkeley, CA 94709

The rocky, windswept Farallon Islands, off the coast of San Francisco, are a nesting spot for tens of thousands of seabirds including Tufted Puffins, Common Murres, and the at-risk Ashy Storm-Petrel. But starting in the 1800s, house mice were introduced to the islands by human visitors. With no natural predators, the mouse population has multiplied to over 60,000. The mice devour seabird eggs and also attract Burrowing Owls from the mainland, which eat Ashy Sorm-Petrels when the mouse population declines in winter. The Farallones host half of the world's nesting population of Ashy Storm-Petrels, and their numbers there have fallen by 42 percent over the past two decades. Without action, bird populations there will continue to decline and the Ashy Storm-Petrel will continue to decline towards extinction.

The USFWS plan involves the use of small amounts of a rodenticide (broudifacoum) dropped by air, an approach that has been used with success in other isolated islands. Measures will be taken to protect gulls, owls, and salamanders that might be harmed by the rodenticide.

This plan is supported by Golden Gate Audubon, PointBlue, and other conservation groups but is opposed by some wildlife organizations that oppose any use of that rodenticide, anywhere.

In general, I oppose the use of this rodenticide because of the damage it can do to other wildlife. But the Farallones—like other isolated small islands—are a special case. There are no other mammals there that can be harmed by the poison. There are no other proven methods of eliminating an invasive rodent population. The survival of an entire bird species, in addition to thousands of individual birds, is at stake.

--
Christina Tarr
christina.tarr@gmail.com
510-375-0520

From: Sue Carlisle
To: Energy@Coastal
Subject: Consistency determination
Date: Thursday, December 9, 2021 4:27:39 PM

I strongly support restoring the ecological balance of the Fallalons in order to preserve the Ashy Strom-Petrel habitat.
Sue Carlisle
San Francisco, CA

From:	Jennifer Gale
To:	Energy@Coastal
Subject:	Better solution than dropping Brodifacoum onto the Farallon Islands
Date:	Thursday, December 9, 2021 4:19:32 PM
Attachments:	Outlook-yvuuqury.png

Hi,

My name is Jennifer Gale and I work at a small zoo in California that houses California native, non-releasable species. I have also spent many years volunteering in Raptor migration studies and with wildlife rehabilitation centers. I am writing to express my concern about the proposed drop of Brodifacoum onto the Farallon Islands to help control the non-native species of mouse that attracts owls and thus threatens the Ashy Storm-Petrel. As you well know, this chemical will not solely affect the targeted populations but will also negatively impact other native species that inhabit the islands, as well as the potential for run-off into the ocean, thus spreading even further. I hope that you will work with scientists to find a solution that targets only the invasive mouse and does not spread to unintended victims.

Please initiate a better solution than a massive drop of second-generation anti-coagulant onto the Farallon Islands so that we can all work toward a better future with long-term goals that can be an example for the future. Perhaps rodent fertility control or trapping and relocating of the Burrowing owls for the time being? Nature knows what it is doing and sometimes what is intended to be helpful, from the human perspective, does more harm than good.

thank you for your time,

Jennifer Gale Lead Keeper
Please note that my work week is Sunday-Thursday

CuriOdyssey | 1651 Coyote Point Dr. | San Mateo, CA 94401
Curiodyssey.org | D: 650-340-7572

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SCIENCE PLAYGROUND & ZOO

you have received this email in error please notify the sender immediately and delete this message and any attachments.

From: noreen@naturetrip.com
To: Farallon Islands Consistency; Energy@Coastal
Subject: Agenda Item Th11b-CD-0006-21
Date: Thursday, December 9, 2021 4:14:02 PM

As a California Native Plant Society board member, Golden Gate Audubon volunteer, and San Francisco resident ask you to approve 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 island has 13 breeding species of seabirds with a population of 300,000. The house mouse is negatively impacting the native birds, salamanders, crickets and plants. There are less than 10,000 of the rare and threatened Ashy Storm Petrel in the world, half of which breed on the Farallones. The house mouse – documented at 500 per acre here, is one of the highest numbers of any island in the world. This dense population of mice, attracts Burrowing Owls which predate upon both species. The invasive house mice also have negative impacts on the native arboreal salamanders, camel crickets other invertebrates, and native plants including the Maritime Goldfield.

Forty nine options were evaluated on this issue. Only one method has been successfully proven in island rodent eradication at 700 islands, and 60 islands specifically with house mouse eradication. The effective plan is the "preferred alternative" by the US Fish and Wildlife Service in their 2019 Final Environmental Impact Statement.

The only way for the Farallon island ecosystem to recover is to completely eradicate the house mice. I have been following this issue for 10 years and have seen the plan improved with input from other agencies and scientific studies. Now is the time to act by supporting this plan.

Thank you for your consideration and for relying on science when making your decision.

Noreen Weeden

From:	Jane Fischberg
To:	Energy@Coastal
Subject:	please approve the US Fish and Wildlife Service plan to eradicate house mice on Farallon Islands
Date:	Thursday, December 9, 2021 4:11:42 PM

To CA Coastal Commission members:

Please help save seabird species on Farallon Islands by supporting the eradication of house mice. These mice devour seabird eggs and attract Burrowing Owls from the mainland, putting in peril Ashy Storm-Petrels and other species. Without this action, Ashy Storm-Petrels will continue to decline towards extinction.

Thank you for supporting the US Fish and Wildlife Service plan!

Jane Fischberg
she/her/hers
510.213.0578

From:	doris mosler
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)"
Date:	Thursday, December 9, 2021 4:11:15 PM

Let's care for the gorgeous planet we have been granted. I **ask the commission to grant a consistency determination for this plan, keeping our Ashy Storm-Petrel population safe and restoring the ecosystem on the Farallon Islands. This is a small issue with grand repercussions.**

Doris Mosler

Sent from my iPad

From:	Ann & Loring Dales
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-OOO6-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 4:08:56 PM

Sirs/Madams: I write to strongly urge the California Coastal Commission to grant a consistency determination for this plan to eliminate invasive house mice from the Southeast Farallon Islands with targeted use of rodenticide.

Thank you for your consideration. - Loring Dales, MD

From:	Rita Sklar
To:	Energy@Coastal
Subject:	support for the South Farallon Islands Invasive House Mouse Eradication Project.
Date:	Thursday, December 9, 2021 4:08:12 PM

To properly address this crisis, the Golden Gate Audubon Society in conjunction with National Audubon and other conservation groups strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project.
Please vote to support this important project.
Thank you.
Sincerely, Rita Sklar

See my paintings at "http://www.ritasklar.com"

From:	Beth Goldberg
To:	Energy@Coastal
Subject:	Approve the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands
Date:	Thursday, December 9, 2021 3:55:28 PM

Dear California Coastal Commission Members,
The Farallon Islands are a vital nesting spot for tens of thousands of seabirds. They are being threatened by invasive house mice brought to the island by human visitors since the 1800s. Please approve the US Fish & Wildlife Service plan to eradicate these mice. The USFWS plan involves the use of small amounts of a rodenticide (broudifacoum) dropped by air, an approach that has been used with success in other isolated islands. The plan is supported by Golden Gate Audubon, PointBlue, and other conservation groups who would otherwise oppose the use of rodenticide. But there are no other mammals on the Farallons that can be harmed. Please approve the USFWS plan to get rid of house mice on the Farallons!
Thank you,
Beth Goldberg
5365 Manila Ave
Oakland CA 94618

From: Mary Betlach
To: Energy@Coastal
Subject: In support of USFWS mouse eradication plan on the Farallon islands
Date: Thursday, December 9, 2021 3:48:09 PM

I support the well thought out USFWS mouse eradication plan on the Farallon islands

Mary Betlach
Long term San Francisco resident

From: mamazzocco@gmail.com
To: Energy@Coastal
Subject: Mouse eradication on the Farallones - SUPPORT
Date: Thursday, December 9, 2021 3:45:00 PM

I am writing, as an Audubon Society member and former pelagic bird rehabilitation clinic volunteer, in support of the USFWS proposal to eradicate mice on the Farallones, which are a crucial nesting spot for my region. Please help protect petrels and other pelagic birds from mouse depredation.

Thank you for your consideration.

Mary Mazzocco
3533 Boston Ave.
Oakland, CA 94602
510-482-9321

Sent from my iPad

From: Sarah Royce
To: Energy@Coastal
Subject: approve plan to eradicate house mice
Date: Thursday, December 9, 2021 3:34:09 PM

Dear Coastal commission,

Please approve the US Fish & Wildlife Service plan to eradicate invasive house mice on the Farallon Islands

I live in Piedmont CA 94611

Sarah
--
email: SarahRoyceMD@gmail.com
skype name: sarahroyce
Cell phone: +1 510 612 6644

From: Alvaro Jaramillo
To: Energy@Coastal
Subject: In support of the mouse eradication project on Southeast Farallon Island.
Date: Thursday, December 9, 2021 3:26:53 PM

Dear Members of the California Coastal Commission.

I am writing as a citizen living in coastal California (Half Moon Bay) in support of the mouse eradication project on Southeast Farallon Islands. I am a biologist, nature tour operator as well as an author (Birds of California, Birds of Chile, New World Blackbirds), and well known birding personality and birding educator. In summer and fall we conduct approximately 40 boat based trips to observe birds and marine mammals from various ports in California, and approximate 10 of our trips are to the Farallon Islands. Of the nearly 600 people we took offshore last year, most of them California residents, there was an overwhelming support of this project. Birders know that the Ashy Storm-Petrel is one of the most restricted ranged of the world's seabirds, and an endemic to the California current system. People realize that the largest colony of this declining species is in the Farallon Islands. Without eradication of the introduced House Mouse, the storm petrel will not continue to thrive on the Farallons. We actively need to restore balance on the island, and the mouse eradication must happen. There is widespread support for this in the biological, conservation, birding, nature tourism, whale watching communities as well as within educated concerned citizens such as my neighbors in Half Moon Bay. We need to have this project go forward, and I heartily throw my support towards mouse eradication.

Thank you on behalf of myself, Alvaro's Adventures, and the thousands of California birders I have contact with.

Alvaro

Alvaro Jaramillo
alvaro@alvarosadventures.com
www.alvarosadventures.com

From:	Ivan Samuels
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21
Date:	Thursday, December 9, 2021 3:16:18 PM

To Whom it May Concern:

I am writing to express my support for the proposed mouse eradication project on SE Farallon Island.

As someone that has worked as a biologist on the Farallon Islands and supports island restoration work and conservation projects more broadly, I sincerely believe this is the best and only method to address the threat posed by the invasive exotic house mice on the island.

The threat to Ashy Storm-Petrels has been well covered. In short, the presence of mice results in over-wintering Burrowing Owls, which then switch to prey on the Storm-Petrels when the mouse population declines. This cycle repeats itself each year, further endangering the birds.

An additional and potentially much more serious threat could develop at SEFI. We now have evidence that mice are attacking adult birds and chicks on Midway Island in the Pacific Ocean, and Gough Island in the South Atlantic Ocean. While this has not 'yet' been documented to my knowledge on SEFI, it would prove catastrophic for many of the seabird species that breed there; even very large adult Albatrosses are being attacked at the above mentioned islands.

Non-target mortality (likely Western Gulls) cannot be entirely prevented. However, data have shown that post-eradication, these populations quickly recover and even exceed their pre-restoration population sizes. Through years of experience, scientists have learned how to minimize such fatalities.

In summary, the proposed project will be a tremendous benefit to the islands' biodiversity, and I strongly support this project.

Sincerely,

Ivan Samuels

Ivan Samuels, Executive Director
March Conservation Fund
1016 Lincoln Blvd., Mailbox #1
San Francisco, CA 94129 USA
415-290-5779
ivan@marchconservationfund.org
www.marchconservationfund.org

From: PATRICIA NEARY
To: Energy@Coastal
Subject: OMG!!
Date: Thursday, December 9, 2021 3:09:44 PM

How can you even think about supplying a rodenticide to this area?? This damage will continue for years and not mitigate the problem.. PLEASE do not allow this plan to go forward.. there are other remedies.. don't be foolish..

Regards,
Pat Neary
Bridgewater, Mass 02324
(OK - I may not be from your area, BUT I care and know about the damage you will perpetrate!!)
508-697-8791 (Landline!)
She/her/hers

Sent from I Pad

From: Greg Marquez
To: Energy@Coastal
Subject: poisonmice?
Date: Thursday, December 9, 2021 2:40:16 PM

Does the poison know which is mouse and which isn't? What kind of imbecile creatures are deciding these disastrous "cures"?

sincerely,
greg marquez

From: Judith Miller
To: Energy@Coastal
Subject: Do not drop rodenticide on farallones!!!
Date: Thursday, December 9, 2021 2:08:54 PM

This is a terrible idea with horrible outcomes. Poisoning fish and other birds.
What are you guys thinking???????
Do not poison the farollones by dropping mice killer. It will backfire badly.

(from my Samsung S21 Ultra 5G)

From: Stuart Cook
To: Energy@Coastal
Subject: Farallon Islands Mouse Control Plan
Date: Thursday, December 9, 2021 2:03:37 PM

I strongly support the USFWS plan to eradicate mice from the Farallon Islands. The islands are a biological treasure and this is a well thought out and thoroughly vetted plan to eliminate an invasive species that is damaging the islands.

Please approve the plan so that it can move forward.

Thank you,

Stuart Cook
Oakland, CA

From: Bev Alexander
To: Energy@Coastal
Subject: Brodifacom?
Date: Thursday, December 9, 2021 10:14:37 AM

Dear Commissioners,

I am surprised that The United States fish and wildlife service is planning to drop Brodifacom on the Farallones to eliminate house mice.

This idea seems rife with possible unintended consequences, including the death of threatened and endangered species.

Why not use a more targeted approach, such as baiting the mice with contraceptive feed?

Using a lethal product like Brodifacom reminds me of the expression, “Shoot first and ask questions later.”

Let’s ask the questions first. Please don’t shoot. It’s hard to tell what you will hit.

With hopes that wisdom and intelligence will prevail,

Beverly Alexander

--

Beverly Alexander
Protect Wild Petaluma

ProtectPetaluma.org

peace.
it does not mean to be in a place
where there is no noise, trouble
or hard work. it means to be in
the midst of those things and still
be calm in your heart.

From: Barbara Framm
To: Energy@Coastal
Subject: Stop the Drop!
Date: Thursday, December 9, 2021 7:57:51 AM

I am writing to vehemently APPOSE the use of rat poison on the Farallon Islands.

I ask the Coastal Commission to absolutely discontinue this harmful to wildlife and water proposal.

STOP THE DROP, by all and any means.

Barbara Framm
I'm the 1970's I worked towards the creation of the Coastal Commission. Please step up to the plate and act with wisdom and foresight for future generations. Poison is NOT an answer to the rodent problem.

Sent from my iPhone--

"We are either going to have a future where women lead the way to make peace with the Earth or we are not going to have a human future at all."
— **Vandana Shiva**

From: Bob Simon
To: Energy@Coastal
Subject: Dumping poison on the Farallon Islands
Date: Thursday, December 9, 2021 7:52:41 AM

Why is this a good idea? There must be a better way. The poison stays in the food chain and in the wildlife chain. DO NOT DUMP POISON IN THE ENVIRONMENT!

From: robert raven
To: Energy@Coastal
Subject: No Poisons on the Farallon Is.
Date: Wednesday, December 8, 2021 10:15:26 PM

Don't use Poisons to kill mice on the Farallon Is. Protect owls and other birds.
Use baits and traps! It's a Wildlife and Sealife Refuge. Don't Poison the Farallons!

From: Richard Charter
To: Teufel, Cassidy@Coastal
Cc: Energy@Coastal; Farallon Islands Consistency
Subject: CD-0006-21 / for the record, and the staff packet, please
Date: Wednesday, December 8, 2021 7:00:36 PM
Attachments: cid5EDFE730-CA97-4502-BC26-2E2586CFBFA6.png

Please note dates....Just one of many examples of real-world situations that illustrate the compelling need for a viable and complete bait spill plan for Brodifacoum pellets in a National Marine Sanctuary or in San Francisco Bay....

Thanks,

Richard
Richard Charter
Coastal Coordination Program
The Ocean Foundation
707-875-2345
707-875-3482

_____

https://www.nzherald.co.nz/nz/shellfish-ban-lifted-three-years-after-poison-spill/W6MMNQ4KJT7ERRIO5I3MSZAN4A/

Shellfish ban lifted three years after poison spill

27 May, 2004 04:15 PM

Three years after a rat poison spill into the sea south of Kaikoura, a shellfish ban has finally been lifted.

A Phoenix Freight truck carrying 18 tonnes of pellets containing the rat poison brodifacoum overturned on State Highway 1 near the Kaikoura road tunnels on May 23, 2001, spilling its load on the rocks and into the sea.

The pellets had been destined for a Department of Conservation rat eradication programme on Campbell Island.

A shellfish-taking ban was quickly put in place by health authorities.

The ban initially took in a large area, an eight-kilometre exclusion zone stretching up to Kaikoura's South Bay, which also included no swimming or diving.

It was soon established that the brodifacoum in the seawater was not an issue, so the exclusion zone was lifted. However, the shellfish ban remained as testing continued.

By July 2002 the exclusion zone was reduced to the 300-metre area of the bay where the crash happened, and that remained in place until this week.

Community and Public Health protection officer Geoff O'Brien said the New Zealand Food Safety Authority assured this week that the ban on shellfish taking could finally be lifted, as the samples taken from paua and mussels now complied with food safety standards.

Caption: Poison Spill -- it is three years since this Phoenix Freight truck overturned on State Highway 1 near the

Kaikoura road tunnels and spilled 18 tonnes of rat poison pellets into the sea.

_____

http://www.pireport.org/articles/2001/05/24/rat-poison-spill-new-zealand-threatens-pacific-marine-breeding-ground

RAT POISON SPILL IN NEW ZEALAND THREATENS PACIFIC MARINE BREEDING GROUND

Submitted by admin on Thu, 05/24/2001 - 00:00

AUCKLAND, New Zealand (May 23, 2001 – Radio Australia)---On New Zealand's South Island, a trailer packed with lethal rat poison has plunged into the sea, threatening one of the world's most famous feeding grounds for whales, dolphins and seals.

Officials are monitoring conditions off Kaikoura, after a truck crashed on the coastal highway, and a trailer it was towing with 18 tons of rat poison fell into the sea.

Kaikoura is one of the few places in the world where whales can be seen feeding near the shore throughout the year.

It's home to large colonies of dolphins and seals, attracting tourists from around the world.

Public health protection officer Paul Schoolderman said the poison would not immediately kill sea creatures because of the slow release nature of the poison, but did pose a threat.

For additional reports from Radio Australia, go to PACIFIC ISLANDS REPORT News/Information Links: Radio/TV News/Radio Australia.

https://www.newscientist.com/article/dn795-poison-spill/

Poison spill

24 May 2001

By **Rachel Nowak**

Environmental officials will have to wait to find out whether a rat poison spill on the rugged New Zealand coastline poses a threat to local whales and other wildlife.

"[The poison] is slow-acting, and it will take about a week before we know the full impact," says Charles Eason, an environmental toxicologist at Landcare Research in Lincoln, New Zealand, who is helping monitor the spread of the poison. "But we don't expect that there will be large scale contamination."

At the very worst, the spill is unlikely to kill more than a small number of seabirds and seals in the immediate area, says Eason. "The symptoms would be bleeding around the mouth, beak, eyes or anus."

On Wednesday, 18 tonnes of green rat pellets spilt into the sea when a truck careered off a coastal road just outside Kaikoura on New Zealand's South Island. The Kaikoura coast is one of the world's main inshore feeding grounds for sperm whales, as well as home to dusky dolphins, New Zealand fur seals and Hector's dolphins. It attracts large numbers of eco-tourists.

The pellets contained brodifacoum. This is a second-generation rat poison designed to replace warfarin, which many rats are resistant to. Like warfarin it kills by stopping the blood from clotting, but it stays in the body far longer than the older rat killer.

Because it persists in animals' bodies, brodifacoum can spread through the food chain, and for that reason it is not widely used in the countryside in the UK and Australia. However, it is used extensively in New Zealand in an effort to rid the islands of exotic pests so that they can be used as sanctuaries for local species such as the kiwi and the pukeko. The spilt load was on its way to Campbell Island where the rat density is one of the highest in the world.

Local government has cleaned up the rat pellets from the rocks, but they do not plan a marine clean-up operation similar to those following major oil spills because rough seas have already started to disperse the poison. “The coast gets hammered by some pretty heavy seas at this time of the year,” says marine specialist Andrew Baxter of the Department of Conservation.
Shellfish, fish, water and sediment samples are being collected for analysis on an on-going basis. Results late on Thursday suggest that brodifacoum levels in the sea had fallen below one part per billion the day after the spill, compared to 20 parts per million in the rat pellets.
The local authorities have warned people not to swim or fish in the area.

_____

https://www.news24.com/News24/Rat-poison-threatens-sealife-20010523

23 May 2001

Rat poison threatens sealife

SHARE

Wellington - A trailer packed with lethal rat poison plunged into the sea on Wednesday, threatening one of the world's most famous feeding grounds for whales, dolphins and seals.

Officials were monitoring conditions off Kaikoura on New Zealand's South Island after a truck crashed on the coastal highway, and a trailer it was towing with 18 tons of rat poison fell into the sea.

The brodifacoum rat poison pellets turned the blue sea water green, police said.

Kaikoura is one of the few places in the world where whales can be seen feeding near the shore throughout the year. It is home to large colonies of dolphins and seals, attracting tourists from around the world.

Public health protection officer Paul Schoolderman said the poison would not immediately kill sea creatures because of the slow release nature of the poison.

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:	Thursday, December 9, 2021 11:56:24 AM

From: ILANA DEBARE <debare@well.com>
Sent: Thursday, December 9, 2021 7:56:16 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:

As a Bay Area lover of wildlife, I urge you to **support** the USFWS proposal to use rodenticides to eradicate the invasive house mice population on the Farallones.

This is a judicious and scientifically-vetted proposal. Similar eradication projects have worked successfully on other islands, and alternative methods have not been proven to work.

Doing nothing will mean the continued risk of tens of thousands of seabird lives, and a threat to the survival of the entire Ashy Storm-Petrel species.

There are many environmental threats such as climate change that feel daunting and too large for us to solve, at least as a single region or state. By contrast, the invasive house mice are an environmental problem that we caused — yet we can easily solve.

Please do the responsible thing and approve the USFWS proposal.

Yours truly,

Ilana DeBare
Oakland, CA 94618

From:	ILANA DEBARE
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Thursday, December 9, 2021 11:56:23 AM

Dear Commissioners:

As a Bay Area lover of wildlife, I urge you to **support** the USFWS proposal to use rodenticides to eradicate the invasive house mice population on the Farallones.

This is a judicious and scientifically-vetted proposal. Similar eradication projects have worked successfully on other islands, and alternative methods have not been proven to work.

Doing nothing will mean the continued risk of tens of thousands of seabird lives, and a threat to the survival of the entire Ashy Storm-Petrel species.

There are many environmental threats such as climate change that feel daunting and too large for us to solve, at least as a single region or state. By contrast, the invasive house mice are an environmental problem that we caused — yet we can easily solve.

Please do the responsible thing and approve the USFWS proposal.

Yours truly,

Ilana DeBare
Oakland, CA 94618

From:	Jonathan D Knight
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 10, 2021 6:35:33 AM

I'm writing to urge the commission to grant a consistency determination to the well-researched and highly-targeted plan to eliminate the invasive house mouse from the Farallon Islands. The alternative is the likely extinction for the Ashy Storm-Petrel and continued risk to the many other bird species that nest there.

Thank you,

Jonathan Knight, Ph.D.
Lecturer Faculty
Department of Biology
San Francisco State University

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: FARALLON ISLAND MICE
Date:	Friday, December 10, 2021 12:07:55 PM

From: Carol Baird <caroljobaird@gmail.com>
Sent: Friday, December 10, 2021 8:07:16 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: FARALLON ISLAND MICE

PLEASE **APPROVE** THE USF&W SERVICE PLAN TO ERADICATE INVASIVE HOUSE MICE (MUS MUSCULUS) THAT ARE HIGHLY INVASIVE AND DESTRUCTIVE TO THE NATIVE WILDLIFE THERE. THEY ARE ENDANGERING THE ASHY STORM-PETREL, AND OTHER SEABIRDS THAT DEPEND ON THE ISLANDS,

GIVEN THAT THESE ISLANDS DO NOT HOUSE MAMMAL SPECIES OTHER THAN THE MICE, AND THAT THE SERVICE WILL PROTECT GULLS AND OWLS AND HERPS THAT MIGHT BE SUSCEPTIBLE TO THE RODENTICIDE, I FEEL THIS ACTION IS WARRANTED.

THANK YOU FOR YOUR GOOD WORK!

Carol Baird, PhD
Founder, CA Institute for Biodiversity
Secretary, Golden Gate Audubon Society

From:	Dena Spatz
To:	Farallon Islands Consistency
Subject:	Agenda Item Th11b-CD-0006-21
Date:	Friday, December 10, 2021 2:26:31 PM

Dear Coastal Commission,

This letter is referencing Agenda Item Th11b-CD-0006-21 for the South Farallon Islands Invasive House Mouse Eradication Project.

The Farallon Islands are a global hotspot for seabirds. It houses the greatest number of seabirds in the Lower 48 states plus a globally listed seabird – the Ashy storm-petrel. As the only seabird hotspot of its kind in California, and across most of the United States, it should be beloved as a national treasure. Yet, the Farallon Islands are under threat from a tiny invasive species – the house mouse – which is destroying the entire ecosystem. Sadly, the Farallon Islands now exist among thousands of other islands in the world where the presence a non-native introduced animal is driving the extinction of countless numbers of native species. Please see my paper on this subject, published in the journal, *Science*.

Fortunately, there is a unique and tangible opportunity to protect and restore the Farallon Islands; this is a bright spot among countless conservation disappointments across this planet. The eradication of invasive mice from the Farallon's is a smart, well planned, and feasible solution to the extinction crisis that is already unfolding on these islands. Mice and other small rodents such as rats have already been successfully removed using highly-targeted rodenticides, from approximately **600 other islands** around the planet – including in California, Hawaii, and Alaska. Check out this global island invasive species eradication tracker to follow these efforts. As a highly proven eradication technique used around the global for over 50 years, it is the only sure way to remove damaging invasive mice from these islands

As a scientist and island specialist, I 100% support the proposal to remove mice from the Farallon Islands. The result of the effort will create an opportunity for native plants and animals to survive, and thrive. As a native San Franciscan, I support this project as a means to restore our local heritage and save our beloved refuge, it is a flagship of biodiversity and a source of pride for our community. This action cannot wait, please vote yes to restore the Farallon Islands.

Dena Spatz, PhD
Senior Conservation Scientist

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 10, 2021 12:07:33 PM

From: Leslie Morelli <lessmor1@gmail.com>
Sent: Friday, December 10, 2021 8:07:16 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)

To Whom It May Concern,

I'm writing you today to request you approve the USFW mouse eradication project on the Farallon Islands as presently planned. It is my understanding this is the best way to ensure the mice are completely removed from the islands. The mice must be completely removed, and ASAP, as they are threatening bird populations.

Thank you for your consideration.

Leslie Morelli
460 Center Street #6247
Moraga, CA 94570

From: Scott Shaffer
To: Farallon Islands Consistency
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Friday, December 10, 2021 2:30:08 PM

Dear Commissioner,
I urge you and your committee to endorse the plan submitted by the US Fish & Wildlife Service to remove non-native mice from the Farallon Islands. I have conducted research on seabirds all over the world, especially remote islands (including the Farallon Islands), and have seen firsthand the disturbance and destruction caused by non-native species. This includes introduced rabbits overgrazing vegetation on subAntarctic islands, feral cats killing albatrosses on islands in Mexico, and introduced mice scalping/killing albatrosses at Midway Atoll. Like the Farallon Islands, the common theme in all cases is the direct or inadvertent introduction of NON-NATIVE species to sensitive island ecosystems with dire consequences to native flora and fauna - especially nesting seabirds. Given the myriad of threats that seabirds can encounter at sea (e.g. bycatch, overexploited resources and changing ocean conditions), the one sure thing we can do that supports their continued existence is restore/protect nesting habitat. The science is overwhelming and unequivocal on this point. Therefore, I strongly encourage your committee to support the plan that will restore the Farallon Islands by eradicating the NON-NATIVE mice. Thank you.

Sincerely,

Scott Shaffer

--
Dr. Scott A. SHAFFER | Professor of Ecology & Evolution
Department of Biological Sciences | San Jose State University
San Jose CA 95192-0100 | Tel +1 408 924 4871 | Scott.Shaffer@sjsu.edu
Publication list on Google Scholar

From: Nadine Peterson
To: Farallon Islands Consistency
Subject: Farallon Islands Mouse Eradication Plan- Support
Date: Friday, December 10, 2021 1:51:13 PM

Dear Commissioners,

I am respectfully urging you to concur with staff's recommendation for approval of the consistency determination for the US Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands.

My entire career was devoted to protecting and restoring California's coastal resources, first as Commission staff, then as staff and eventually Chief Deputy EO for the Coastal Conservancy. Now retired, I am serving on Pt. Blue Conservation Science Board of Directors as I strongly support their mission and high level of scientific integrity.

I fully appreciate the gravity of the decision before you. Concerns about poisoning the mice and potential by-catch are understandable. I personally do not use rodenticides to manage the many rodents in my yard, as trapping is a viable alternative and I can tolerate some without impacting endangered species. The Farallon Islands is an entirely different and unique situation. The non-native house mice 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.

Extensive science and analysis has been undertaken and concluded that 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. Similar eradication programs on islands have been successful in eliminating rodent populations for the longer term. There is now an opportunity to protect birds and restore the Farallon Islands that should not be lost.

Thank you for your service as a Coastal Commissioner, and for following the best available science when making your decision.

Sincerely,
Nadine Peterson

From: Energy@Coastal
To: Farallon Islands Consistency
Subject: FW: Plan
Date: Friday, December 10, 2021 1:04:58 PM

From: Howard and Susan Friedman <aldo_camus@sbcglobal.net>
Sent: Friday, December 10, 2021 9:04:49 PM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Plan

To whom this may concern,

I support the planned use of rodenticide on the Farallon Islands to eradicate the rodents to protect the flora and fauna that are native. I am hoping other methods to eliminate or control invasive species can be found in the future.

Howard Friedman
San Jose, CA

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Formal Commentary: Opposing USFW"s Proposed Plan to bomb the Farallone Islands with Rodenticide
Date:	Friday, December 10, 2021 12:31:03 PM

From: Raymond Paulson <raymond.paulson@gmail.com>
Sent: Friday, December 10, 2021 8:30:45 PM (UTC+00:00) Monrovia, Reykjavik
To: Raymond Paulson <raymond.paulson@gmail.com>
Cc: Energy@Coastal <EORFC@coastal.ca.gov>; Ariane Eroy <environmental.emergence@gmail.com>
Subject: Re: Formal Commentary: Opposing USFW's Proposed Plan to bomb the Farallone Islands with Rodenticide

To all,

As United States navy engineer federal executive orders require all public operations, lands, perform life cycle sustainbility the assessment LCSA for Solutions.

Poisoning clearly does not qualify as a root cause solution. Shifts burden to other life forms. Federal government utilitizes removing invasive species without poison, as poison harms other life forms taking decades or longer to recover. At net cost to envionment impacts the Economy ultimately and quality of life, an unjust Solution.

A true Solution needed. They exist. Significant Lower cost LCSA. No more misuse of public lands and tax dollars. Find the root cause Solutions finding subject matter experts SME for this task.

Respectfully, Ray Paulson
6369 San Diego CA, 92111

On Fri, Dec 10, 2021, 10:50 AM Ariane Eroy <ariane_ahimsa@yahoo.com> wrote:

> Dear California Coastal Commission:
>
> The Federal, State, and local governments have long been compromised by the **undue influence of corporate lobbyists**, posing as brokers for largely unregulated corporations, that effectively delay imperative, yet strenuous or unwanted, changes to our society. By deviating, disempowering, or even deceiving elected officials far afield from the most urgent and important issues of our time, special interest groups have propelled our society far astray from many of its most noble and highest goals. In Sacramento alone, there are over 1800 registered lobbyists [See John Meyers, Sacramento Bureau Chief's December 4, 2016 article in *The Los Angels Times*]. In 2019 alone, corporations and special interest groups spent over $300 million dollars to influence government decisions in Sacramento, in the first 9 months alone [See John Meyers, Sacramento Bureau Chief's, November 4, 2019 article in *The Los Angels Times*].
>
> **Our nation has too long prioritized economic activity, GDP, and development over regulation, human rights, and, as of yet, the unexpressed Rights of**

Nature. While decarbonization and de-growth should have been the chief goals of COP26, world leaders spoke in mostly aspirational ways, or claimed that there was "no other alternative" to the present life-style First World Nations enjoy.

The World waited breathless for two weeks to learn of the treaties signed at the COP26 proceedings--only to have our greatest hopes dissolved into consternation and horror. I want to remind you of how **the forces of commercialization can contaminate even the best political interventions**, and thus delay, or even deter Americans' most noble tendencies, including our willingness to sacrifice our current comfortable life-style, merely so others can live! In fact, *Global Witness* wrote, in its "Analysis of UN's Provisional List of COP26 Named Attendees", "If the fossil fuel lobby were a country delegation at COP it would be the largest, with 503 delegates — two dozen more than the largest country delegation" ["The Greenwashing of COP26: Fossil Fuel Lobbyists Make Up Biggest Delegation at U.N. Climate Summit", *Democracy Now!*, November 8, 2011, https:// http://www.democracynow.org]. One must ask: Why then would we consider the fossil fuel industries to be honest power-brokers or environmental advocates now, after 40 years of climate denialism?

Greta Thunberg underscored, "The leaders...are actively creating loopholes to benefit themselves...To stay below the targets set in the Paris agreements, and thereby minimizing the risks of setting off irreversible chain reactions beyond human control, we need immediate, drastic, annual emission cuts, unlike anything the world has ever seen... Our remaining CO2 budgets... will be gone within the end of this decade...And it is very naive of us to think that we could solve this crisis without addressing the root cause of it." ["COP26 Is a Failure": Greta Thunberg Condemns U.N. Climate Summit as a "Greenwash Festival", *Democracy Now!*, November 8, 2011, https://www.democracynow.org].

Like many Americans, I have deep concerns about the State and Federal Governments' environmental projects going forward. For example, **corporate influencers and ideologues are presently esconced on the Farallones themselves, where *Point Blue Conservation* has been offered an outpost on Southeast Farallone Island.** Such island conservation [sic] groups purport the use of deadly poisons as a means of eradicating unwanted species, while at the same time dismissing the interconnectedness of all life, and the vulnerability of the entire food chain when land, water, and air are allowed to be contaminated. (For example, a similar group, called *Island Conservation* has already promoted 350 poisoning projects on islands worldwide (while hiding that the the fact that the failure rate for mice eradication is 38% [Richard Charter, Senior Fellow with the Coastal Coordination Program of The Ocean Foundation, personal communication, October 5, 2021]).

This special interest group is presently lobbying the US Fish and Wildlife Service to conduct a 1.5 ton aerial drop of rodenticide on the Farallone Islands. Such a poison bombing would not merely impact the Islands' mice, the burrowing owls residing there, and the endangered Ashy Storm Petrel that the toxic intervention claims to

protect, but also impose a slow, excruciating death by Brodifacoum poisoning on the dolphins, the sea lions, the humpback whales, as well as the fish that the birds, sea mammals, and fish Californians feed on. **Inevitably, if this proposed project is approved, rodenticide will contaminate not merely the Islands, but the San Francisco Bay and coastal ocean waters. It will make the Pacific Ocean unsafe for surfers and bathers, up and down the California Coast. It will wash up thousands of birds onto the seashore reminding recalcitrant politicians, local residents, and tourists alike of Humanity's over-reach. It will make the fish inedible for years** [See http:// poisonfreesanctuary.org/wp-content/uploads/2021/04/ ourpoisonfreesanctuary_book.pdf]. And yet the islands are deemed to be protected as the "Greater Farallones National Marine Sanctuary".

Recently, Governor Newsom launched the 30x30 Initiative: The premise underlying the Executive Order N-82-20 is that wild-lands need protection, and thus these coastal lands cannot be stripped of life. Moreover, the proposed aerial bombardment would occur on lands long held sacred to the Coast Miwok and Ohlone Peoples, who conceive of these lands as places where their ancestors' spirits travel directly after their death [See: http://poisonfreesanctuary.org/wp-content/uploads/ 2021/04/ourpoisonfreesanctuary_book.pdf.]. Such a proposal thus ignores the Executive Order's stated commitment as regards to honoring the values and insights of California Native American tribes (N-82-20, No. 1).

In sum, the USFWS does administer these islands, forcing San Franciscans, local indigenous peoples, our elected officials, and Californians, in general, to struggle to find a means of protecting the Farallones, even though these islands have already been designated as a marine sanctuary. **Yet both the Federal Government and the State have already slated the Sanctuary for protection, not an indiscriminate poisoning, not merely by categorizing it as a Marine Sanctuary but also under (EO) N-82-20, which states: "In developing this Strategy, agencies shall be guided by the following principles: Promote healthy lands that provide multiple benefits including improved air quality, reliable water supply, thriving communities, and economic sustainability" [6.a].**

The second issue I hold against *Point Blue Conservation* is ideological, as *Point Blue* is an organization that promulgates Nativism (and, correspondingly, pesticide usage). Note well: One day, very soon, Nativism will be denounced as not merely nostalgic, fundamentalistic, and reactionary, but as unscientific and sorely misguided.

Nativists, however, argue for the supremacy of certain species, and as such, nativism must be considered a form of eugenics. Employing the same bigoted tropes that were used against Native Americans and immigrants for centuries, Nativists denigrate certain species, denouncing them as "non-native", insisting that they "do not belong here", that they are "dirty", or "proliferating without end", that they are "invasive" and thus "dangerous". This is clearly an act of projection, if one considers that human action has rendered over 68% of all species extinct since the 1970s [See: https://www.cbc.ca/ news/science/living-plant-wwf-2018-1.4882819].

Nativists deny the fact that all species and all ecosystems are changing, living systems; all life forms have a meaning and a purpose. Diverse life forms, in essence, are evolving, sentient beings. While Darwin's ideas about evolution as a drive for not merely survival but also for balance, homeostasis and self-improvement have been largely known and increasingly accepted by educated peoples world-wide since 1859, Websters dictionary equates intelligence with the capacity to adapt to changing circumstances. Let it be known!

Moreover, when Nativists argue for the liberal use of pesticides, they deny that their actions are accelerating and intensifying climate disruption. As such, Point Blue Conservation's presence on the Farallone Islands creates too much of an opportunity that environmental planning will be corrupted moving forward. As such, it is necessary that such an organization, which might be considered a front for the pesticide industry, be disallowed from ensconcing itself on the Islands, considering that governmental bodies have committed to being fair and neutral, and have a duty not merely to protect tax payers' monies but also to abide by the precautionary principle. In sum, the probability is too high that ***Point Blue Conservation*** **is** exercising undue influence over the State and Federal Government, despite the Public's opposition, and as such, it will be a corrupting influence, for example, as **Point Blue Conservation** does partner with the rodenticide industry and does promulgate eugenics.

Finally, I need to question the idea of jurisdiction in this case: The Farallones are located in District 1 of San Francisco where I work and live; they comprise part of California's coastal lands; and they are administered by the Federal Government's US Fish and Wildlife Service. At present, traditional ideas about jurisdiction are not viable when considering climate chaos, for radical environmental disruption fails to respect: physical borders or boundaries; the responsibilities and rights claimed under singular jurisdictions; diverse, sprawling, terra-forma; confined bodies of water, or even human lives.

When we nurture a connection with the natural world, we come to understand our interdependence with all living beings. **Only by considering ecosystems as interlocking living tissue that does not correspond to borders, unique jurisdictions, or singular domains of research, will we create true, reparative, humane models of change.**

But because of Americans' historically ruthless relationship to the plant and animal world, within an economy that deems profits as guiding principles, our governments have been reticent, if not derelict, in recognizing the force of climate disruption over the past 40 years. Despite the fact that Congressional Hearings on this subject began with Rachel Carson's testifying about pesticide toxicity before the Senate in 1963. The problem of environmental poisoning stem not merely from Human recklessness, complacency and greed but also a lack of political will. In the face of Americans' dearth of moral rectitude, we need to protest as well as to envision a

different kind of future. But by “doing too little, too late”, all life is endangered now. As such, **the State of California has a moral responsibility and obligation to advocate across all jurisdictions.**

Present models of justice, however, place an undue burden on ordinary citizens, who lack adequate monies or the capacity to monitor and confront diverse public and private agencies, organizations, and institutions because such entities have access to lawyers while their operations are largely clandestine. Most citizens are unable to fight for their own rights, let alone for the maintenance of the Commons, through legal means. As such, separative government agencies, whether local, state or national, cannot be allowed to enact decisions merely within singular jurisdictions or in silos, by claiming exclusive rights over jurisdictions that, nonetheless, permeate various land bodies and moving waters. Moreover, the Public’s interests and values must be understood as inclusive and overlapping, rather than exclusive or conflictual. The primacy of understanding that the intersecting webs of relationships supersede borders, and far outstrip so-called private property rights and materialistic pursuits on a planet of finite resources, is of utmost importance now.

A**s systems are recognized as increasingly complex, we are compelled to accept additional perspectives, stricter moral codes, and better structured or layered principles. Within new systems understanding, in fact, comes the necessity of a new world view, one that recognizes the Planet’s underlying reality, a conscious reality in which meaning-making is actually a function of the interconnectedness of all, sentient life** (Jeremy Lent, The Web of Meaning: Integrating Science and Wisdom to find our place in the Universe, *Share International Live*). **As Climate Disruption is the most urgent and important issue of our time, we thus must recognize that the old, unconscious, and thus reckless enterprises of the past must be abandoned and condemned, so that we can affirm, discover, and make manifest a truly healthy, sustainable world.**

Sincerely yours,

Ariane Eroy, Ph. D
716 20th Avenue
San Francisco, CA 94121

From:	LeAnn Bjelle
To:	Farallon Islands Consistency
Subject:	proposed use of Brodifacoum
Date:	Friday, December 10, 2021 12:24:44 PM

Hello,

I strongly object to the U.S. Fish and Wildlife Agency dropping the rodenticide on the Farallon Islands. It will have significant collateral damage on wildlife other than mice. We cannot continue practices that destroy native animals and plants. There are more effective and far less damaging methods of containing the mouse population. Natural predators such as the burrowing owls do a good job of reducing the mouse population. Please make use of the "harmless fertility control baits capable of achieving the project purpose without excessive devastating bykill."

Thank you for considering alternatives to use of Brodifacoum.

LeAnn Bjelle

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 10, 2021 12:10:01 PM

From: Kay Taylor <kaytaylor.now@gmail.com>
Sent: Friday, December 10, 2021 8:09:47 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)"

The Farallon Islands ecosystem is a precious, fragile asset, especially for nesting pelagic birds. The USFW rodent eradication plan is carefully made to eradicate the invasive mouse problem without undue damage. Please grant a consistency determination for this important measure.

Thank you,

Kathleen Taylor, MD
Oakland, CA

From: Nora Livingston
To: Farallon Islands Consistency
Subject: Support for Farallon Islands Mouse Eradication Plan
Date: Friday, December 10, 2021 3:54:42 PM

Dear Commissioner,

I am one of just a few hundred biologists who have had the pleasure to actually live on Southeast Farallon Island (SEFI)--I spent 9 weeks straight on SEFI in the fall of 2012, and another 5 weeks out there in fall 2013. It is a truly unique and special place and it is an excellent example of a closed ecosystem that we CAN conserve and restore. Many other places with invasive species are basically a lost cause, but SEFI has a chance to be free of the invasive infestation of house mice that 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.

I am asking you to 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 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.

I was on SEFI when the original Island Conservation, UC Davis, and Point Blue crew was conducting hazing trials to see if they could keep the gulls off the island. I was pleased to see how well it worked and to get to be involved in the conversations between all the biologists while they discussed the problems the mice caused to the ashy storm-petrels and the rest of the ecosystem.

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

Sincerely,

Nora Livingston

From:	Energy@Coastal
To:	Farallon Islands Consistency
Subject:	FW: Public Comment of Support South Farallon Mouse Eradication Project 12/2021 Agenda Item 11b - CD-0006-21 (USFWS
Date:	Friday, December 10, 2021 4:18:32 PM

From: Laura Cremin <l.e.cremin@gmail.com>
Sent: Saturday, December 11, 2021 12:18:16 AM (UTC+00:00) Monrovia, Reykjavik
To: Energy@Coastal <EORFC@coastal.ca.gov>
Subject: Public Comment of Support South Farallon Mouse Eradication Project 12/2021 Agenda Item 11b - CD-0006-21 (USFWS

Support of USFWS South Farallon Islands Invasive House Mouse Eradication Project

Hello Commissioners,

I would like to voice my deep support for the Farallon Island mouse eradication project. I have followed the development of this project for several years and am thrilled to see implementation of this critical management action to preserve the Ashy Storm-Petrel and the critical breeding habitat for many species. The Farallon Islands are of global significance.

The project has been extremely well thought out and is supported by biologists who have lived on the Farallon Islands for decades and know the intricacies of its ecosystem better than anyone.

There are two common concerns people are having with this proposal:
1. Use of rodenticides. The Precautionary Principal is readily satisfied. The proposal thoroughly discusses no risk to aquatic environment or non-target species and exhausts any reasonable doubt that it could do so. The methods proposed have been demonstrated with excellent success in several islands with no unanticipated issues arising. I am a tremendous proponent of banning the use of rodenticide for broad application and introduction into the environment. As the conservation chair of the Golden Gate Audubon Society's East Bay chapter, I have advocated for the passage of AB1788. However, specialized and careful application is consistent with all guidance for restoring habitats and enhancing biodiversity. For example, California Invasive Plant Council's guidance on the use of herbicide is that it is an important and critical tool to control invasive plants and can be done safely if applied in a targeted way. The same logic applies to rodenticide.

2. Animal welfare. Some oppose any intervention that could case the death of an animal. While no one likes to see mice eliminated, the alternative of a cycle of boom/bust overpopulation and starvation is a far crueler cycle. The mouse population can peak at 490 mice per acre! Human intervention is necessary because human intervention caused the problem (introduction of invasive mice) in the first place. An opposition position takes no value in preserving biodiversity, only a maniacal march into a monoculture.

Although people are well meaning from their concerns, the vast majority of comments you will be receiving will be from people using gut-reactions to the words "rodenticide" who have not fully delved into the plan or listened to talks from biologists whose life work is protecting the island. The

alternatives being proposed (mouse birth control) are ludicrous, infeasible, and could actually cause more harm than good. Extinction is forever! There is not time to continue waffling or test ill-conceived ideas, action is needed now and we already have a robust plan. Short-term thinking demonstrated by opponents does the environment no good. It leaves us in a world where our islands have no Kakapo in New Zealand. No Gray-headed Albatross in Antarctic Marion Island. No King Penguin in South Georgia. These are all species saved by management actions on islands.

When the decision was made in the 1980's to capture the last remaining California Condors from the wild, the plan almost wasn't initiated due to welfare concerns. Proponents noted that an inevitable (as lead would 100% be consumed), long, slow death from lead poisoning was far crueler and not any more of a noble wild end to the species. We would not have CA Condors alive on the planet today if intervention was not made. Please approve this project so we can live in a world made more beautiful by a biodiverse Farallon Island.

Thank you for your consideration,
Laura Cremin
Oakland, CA

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 10, 2021 4:29:54 PM

From: henrymally@aol.com <henrymally@aol.com>
Sent: Saturday, December 11, 2021 12:29:47 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 (U.S. Fish and Wildlife Service, San Francisco)

Re: California Commission Consistency

It is imperative to remove introduced mice from the Farallon Islands to keep sea birds safe, in particular the Ashy Storm-Petrel population. We ask you to grant a consistency determination for the USFW service's planned use of rodenticide to exterminate the invasive house mice on the Farallon Islands.

Thank you,
Henry Mally and DeAda Mally (National Audubon, Golden Gate Audubon Society, EDF, NRDC, and Sierra Club members)

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 10, 2021 4:28:39 PM

From: loisy@aol.com <loisy@aol.com>
Sent: Saturday, December 11, 2021 12:28:30 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 (U.S. Fish and Wildlife Service, San Francisco)

As a biologist who has followed the disastrous ecological effects of invasive house mice on the Farallon Islands, I wanted to write to strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project. Seabirds and other birds on islands around the world are extremely sensitive to the destructive attacks of non-native species like mice and rats, and have often been forced into extinction by such attacks. In order to save the Ashy Storm-Petrel and other Farallon-breeding species, please approve the USFW mouse eradication project. I have seen the wonderful success of such rodent eradication projects in New Zealand and the Galapagos Islands, and we can do it here too! The Farallon Islands are a fantastic wildlife area that deserves our protection from invasive rodents.

Thank you very much for your consideration
Sincerely,
Lois Yuen
Berkeley, CA

From: henrymally@aol.com
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Friday, December 10, 2021 4:29:53 PM

Re: California Commission Consistency

It is imperative to remove introduced mice from the Farallon Islands to keep sea birds safe, in particular the Ashy Storm-Petrel population. We ask you to grant a consistency determination for the USFW service's planned use of rodenticide to exterminate the invasive house mice on the Farallon Islands.

Thank you,
Henry Mally and DeAda Mally (National Audubon, Golden Gate Audubon Society, EDF, NRDC, and Sierra Club members)

From: loisy@aol.com
To: Energy@Coastal
Subject: Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date: Friday, December 10, 2021 4:28:36 PM

As a biologist who has followed the disastrous ecological effects of invasive house mice on the Farallon Islands, I wanted to write to strongly support the U.S. Fish and Wildlife's (USFW) South Farallon Islands Invasive House Mouse Eradication Project. Seabirds and other birds on islands around the world are extremely sensitive to the destructive attacks of non-native species like mice and rats, and have often been forced into extinction by such attacks. In order to save the Ashy Storm-Petrel and other Farallon-breeding species, please approve the USFW mouse eradication project. I have seen the wonderful success of such rodent eradication projects in New Zealand and the Galapagos Islands, and we can do it here too! The Farallon Islands are a fantastic wildlife area that deserves our protection from invasive rodents.

Thank you very much for your consideration
Sincerely,
Lois Yuen
Berkeley, CA

From:	Bill Standley
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 10, 2021 2:39:03 PM

California Coastal Commission,

I am a professional wildlife biologist and have worked with seabird conservation issues in both California and Hawaii for over 20 years. I am writing to support the U.S. Fish and Wildlife Service proposal to restore the Farallon Islands National Wildlife Refuge through the eradication of invasive mice. This project is identified as one of the highest priority conservation actions in the Ashy storm-petrel conservation action plan and is critical to restoring balance to island's ecosystem, which is one of the most important locations for breeding seabirds in the U.S..

Therefore, I request that you approve the upcoming request for a consistency determination for the US Fish and Wildlife Service's restoration plan.

Bill Standley
Cayucos, CA

From:	Leslie Morelli
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 10, 2021 12:07:31 PM

To Whom It May Concern,

I'm writing you today to request you approve the USFW mouse eradication project on the Farallon Islands as presently planned. It is my understanding this is the best way to ensure the mice are completely removed from the islands. The mice must be completely removed, and ASAP, as they are threatening bird populations.

Thank you for your consideration.

Leslie Morelli
460 Center Street #6247
Moraga, CA 94570

From: Laura Cremin
To: Energy@Coastal
Subject: Public Comment of Support South Farallon Mouse Eradication Project 12/2021 Agenda Item 11b - CD-0006-21 (USFWS
Date: Friday, December 10, 2021 4:18:31 PM

Support of USFWS South Farallon Islands Invasive House Mouse Eradication Project

Hello Commissioners,

I would like to voice my deep support for the Farallon Island mouse eradication project. I have followed the development of this project for several years and am thrilled to see implementation of this critical management action to preserve the Ashy Storm-Petrel and the critical breeding habitat for many species. The Farallon Islands are of global significance.

The project has been extremely well thought out and is supported by biologists who have lived on the Farallon Islands for decades and know the intricacies of its ecosystem better than anyone.

There are two common concerns people are having with this proposal:
1. Use of rodenticides. The Precautionary Principal is readily satisfied. The proposal thoroughly discusses no risk to aquatic environment or non-target species and exhausts any reasonable doubt that it could do so. The methods proposed have been demonstrated with excellent success in several islands with no unanticipated issues arising. I am a tremendous proponent of banning the use of rodenticide for broad application and introduction into the environment. As the conservation chair of the Golden Gate Audubon Society's East Bay chapter, I have advocated for the passage of AB1788. However, specialized and careful application is consistent with all guidance for restoring habitats and enhancing biodiversity. For example, California Invasive Plant Council's guidance on the use of herbicide is that it is an important and critical tool to control invasive plants and can be done safely if applied in a targeted way. The same logic applies to rodenticide.

2. Animal welfare. Some oppose any intervention that could case the death of an animal. While no one likes to see mice eliminated, the alternative of a cycle of boom/bust overpopulation and starvation is a far crueler cycle. The mouse population can peak at 490 mice per acre! Human intervention is necessary because human intervention caused the problem (introduction of invasive mice) in the first place. An opposition position takes no value in preserving biodiversity, only a maniacal march into a monoculture.

Although people are well meaning from their concerns, the vast majority of comments you will be receiving will be from people using gut-reactions to the words "rodenticide" who have not fully delved into the plan or listened to talks from biologists whose life work is protecting the island. The alternatives being proposed (mouse birth control) are ludicrous, infeasible, and could actually cause more harm than good. Extinction is forever! There is not time to continue waffling or test ill-conceived ideas, action is needed now and we already have a robust plan. Short-term thinking demonstrated by opponents does the environment no good. It leaves us in a world where our islands have no Kakapo in New Zealand. No Gray-headed Albatross in Antarctic Marion Island. No King Penguin in South Georgia. These are all species saved by management actions on islands.

When the decision was made in the 1980's to capture the last remaining California Condors from the wild, the plan almost wasn't initiated due to welfare concerns. Proponents noted that an inevitable (as lead would 100% be consumed), long, slow death from lead poisoning was far crueler and not any more of a noble wild end to the species. We would not have CA Condors alive on the planet today if intervention was not made. Please approve this project so we can live in a world made more beautiful by a biodiverse Farallon Island.

Thank you for your consideration,
Laura Cremin
Oakland, CA

From: Paone, Richard O
To: Energy@Coastal
Subject: Mice on the Farallons
Date: Friday, December 10, 2021 1:35:08 PM

Please eliminate the mice on the Farallons

Sent from my iPhone

From: Howard and Susan Friedman
To: Energy@Coastal
Subject: Plan
Date: Friday, December 10, 2021 1:04:56 PM

To whom this may concern,

I support the planned use of rodenticide on the Farallon Islands to eradicate the rodents to protect the flora and fauna that are native. I am hoping other methods to eliminate or control invasive species can be found in the future.

Howard Friedman
San Jose, CA

From:	Raymond Paulson
To:	Raymond Paulson
Cc:	Energy@Coastal; Ariane Eroy
Subject:	Re: Formal Commentary: Opposing USFW"s Proposed Plan to bomb the Farallone Islands with Rodenticide
Date:	Friday, December 10, 2021 12:31:01 PM

To all,

As United States navy engineer federal executive orders require all public operations, lands, perform life cycle sustainbility the assessment LCSA for Solutions.

Poisoning clearly does not qualify as a root cause solution. Shifts burden to other life forms. Federal government utilitizes removing invasive species without poison, as poison harms other life forms taking decades or longer to recover. At net cost to envionment impacts the Economy ultimately and quality of life, an unjust Solution.

A true Solution needed. They exist. Significant Lower cost LCSA. No more misuse of public lands and tax dollars. Find the root cause Solutions finding subject matter experts SME for this task.

Respectfully, Ray Paulson
6369 San Diego CA, 92111

On Fri, Dec 10, 2021, 10:50 AM Ariane Eroy <ariane_ahimsa@yahoo.com> wrote:

> Dear California Coastal Commission:
>
> The Federal, State, and local governments have long been compromised by the **undue influence of corporate lobbyists**, posing as brokers for largely unregulated corporations, that effectively delay imperative, yet strenuous or unwanted, changes to our society. By deviating, disempowering, or even deceiving elected officials far afield from the most urgent and important issues of our time, special interest groups have propelled our society far astray from many of its most noble and highest goals. In Sacramento alone, there are over 1800 registered lobbyists [See John Meyers, Sacramento Bureau Chief's December 4, 2016 article in *The Los Angels Times*]. In 2019 alone, corporations and special interest groups spent over $300 million dollars to influence government decisions in Sacramento, in the first 9 months alone [See John Meyers, Sacramento Bureau Chief's, November 4, 2019 article in *The Los Angels Times*].
>
> **Our nation has too long prioritized economic activity, GDP, and development over regulation, human rights, and, as of yet, the unexpressed Rights of Nature. While decarbonization and de-growth should have been the chief goals of COP26, world leaders spoke in mostly aspirational ways, or claimed that there was "no other alternative" to the present life-style First World Nations enjoy.**
>
> The World waited breathless for two weeks to learn of the treaties signed at the COP26 proceedings--only to have our greatest hopes dissolved into consternation

and horror. I want to remind you of how **the forces of commercialization can contaminate even the best political interventions**, and thus delay, or even deter Americans' most noble tendencies, including our willingness to sacrifice our current comfortable life-style, merely so others can live! In fact, *Global Witness* wrote, in its "Analysis of UN's Provisional List of COP26 Named Attendees", "If the fossil fuel lobby were a country delegation at COP it would be the largest, with 503 delegates — two dozen more than the largest country delegation" ["The Greenwashing of COP26: Fossil Fuel Lobbyists Make Up Biggest Delegation at U.N. Climate Summit", *Democracy Now!*, November 8, 2011, https:// http://www.democracynow.org]. One must ask: Why then would we consider the fossil fuel industries to be honest power-brokers or environmental advocates now, after 40 years of climate denialism?

Greta Thunberg underscored, "The leaders...are actively creating loopholes to benefit themselves...To stay below the targets set in the Paris agreements, and thereby minimizing the risks of setting off irreversible chain reactions beyond human control, we need immediate, drastic, annual emission cuts, unlike anything the world has ever seen... Our remaining CO2 budgets... will be gone within the end of this decade...And it is very naive of us to think that we could solve this crisis without addressing the root cause of it." ["COP26 Is a Failure": Greta Thunberg Condemns U.N. Climate Summit as a "Greenwash Festival", *Democracy Now!*, November 8, 2011, https://www.democracynow.org].

Like many Americans, I have deep concerns about the State and Federal Governments' environmental projects going forward. For example, **corporate influencers and ideologues are presently esconced on the Farallones themselves, where *Point Blue Conservation* has been offered an outpost on Southeast Farallone Island.** Such island conservation [sic] groups purport the use of deadly poisons as a means of eradicating unwanted species, while at the same time dismissing the interconnectedness of all life, and the vulnerability of the entire food chain when land, water, and air are allowed to be contaminated. (For example, a similar group, called *Island Conservation* has already promoted 350 poisoning projects on islands worldwide (while hiding that the the fact that the failure rate for mice eradication is 38% [Richard Charter, Senior Fellow with the Coastal Coordination Program of The Ocean Foundation, personal communication, October 5, 2021]).

This special interest group is presently lobbying the US Fish and Wildlife Service to conduct a 1.5 ton aerial drop of rodenticide on the Farallone Islands. Such a poison bombing would not merely impact the Islands' mice, the burrowing owls residing there, and the endangered Ashy Storm Petrel that the toxic intervention claims to protect, but also impose a slow, excruciating death by Brodifacoum poisoning on the dolphins, the sea lions, the humpback whales, as well as the fish that the birds, sea mammals, and fish Californians feed on. **Inevitably, if this proposed project is approved, rodenticide will contaminate not merely the Islands, but the San Francisco Bay and coastal ocean waters. It will make the Pacific Ocean unsafe for surfers and bathers, up and down the California Coast. It will wash up thousands of birds onto the seashore reminding recalcitrant politicians,**

local residents, and tourists alike of Humanity's over-reach. It will make the fish inedible for years [See http:// poisonfreesanctuary.org/wp-content/uploads/2021/04/ ourpoisonfreesanctuary_book.pdf]. And yet the islands are deemed to be protected as the "Greater Farallones National Marine Sanctuary".

Recently, Governor Newsom launched the 30x30 Initiative: The premise underlying the Executive Order N-82-20 is that wild-lands need protection, and thus these coastal lands cannot be stripped of life. Moreover, the proposed aerial bombardment would occur on lands long held sacred to the Coast Miwok and Ohlone Peoples, who conceive of these lands as places where their ancestors' spirits travel directly after their death [See: http://poisonfreesanctuary.org/wp-content/uploads/ 2021/04/ourpoisonfreesanctuary_book.pdf.]. Such a proposal thus ignores the Executive Order's stated commitment as regards to honoring the values and insights of California Native American tribes (N-82-20, No. 1).

In sum, the USFWS does administer these islands, forcing San Franciscans, local indigenous peoples, our elected officials, and Californians, in general, to struggle to find a means of protecting the Farallones, even though these islands have already been designated as a marine sanctuary. **Yet both the Federal Government and the State have already slated the Sanctuary for protection, not an indiscriminate poisoning, not merely by categorizing it as a Marine Sanctuary but also under (EO) N-82-20, which states: "In developing this Strategy, agencies shall be guided by the following principles: Promote healthy lands that provide multiple benefits including improved air quality, reliable water supply, thriving communities, and economic sustainability" [6.a].**

The second issue I hold against *Point Blue Conservation* is ideological, as *Point Blue* is an organization that promulgates Nativism (and, correspondingly, pesticide usage). Note well: One day, very soon, Nativism will be denounced as not merely nostalgic, fundamentalistic, and reactionary, but as unscientific and sorely misguided.

Nativists, however, argue for the supremacy of certain species, and as such, nativism must be considered a form of eugenics. Employing the same bigoted tropes that were used against Native Americans and immigrants for centuries, Nativists denigrate certain species, denouncing them as "non-native", insisting that they "do not belong here", that they are "dirty", or "proliferating without end", that they are "invasive" and thus "dangerous". This is clearly an act of projection, if one considers that human action has rendered over 68% of all species extinct since the 1970s [See: https://www.cbc.ca/ news/science/living-plant-wwf-2018-1.4882819].

Nativists deny the fact that all species and all ecosystems are changing, living systems; all life forms have a meaning and a purpose. Diverse life forms, in essence, are evolving, sentient beings. While Darwin's ideas about evolution as a drive for not merely survival but also for balance, homeostasis and self-improvement have been largely known and increasingly accepted by educated peoples world-wide since 1859, Websters dictionary equates intelligence with the

capacity to adapt to changing circumstances. Let it be known!

Moreover, when Nativists argue for the liberal use of pesticides, they deny that their actions are accelerating and intensifying climate disruption. As such, Point Blue Conservation's presence on the Farallone Islands creates too much of an opportunity that environmental planning will be corrupted moving forward. As such, it is necessary that such an organization, which might be considered a front for the pesticide industry, be disallowed from ensconcing itself on the Islands, considering that governmental bodies have committed to being fair and neutral, and have a duty not merely to protect tax payers' monies but also to abide by the precautionary principle. In sum, the probability is too high that ***Point Blue Conservation*** **is** exercising undue influence over the State and Federal Government, despite the Public's opposition, and as such, it will be a corrupting influence, for example, as **Point Blue Conservation** does partner with the rodenticide industry and does promulgate eugenics.

Finally, I need to question the idea of jurisdiction in this case: The Farallones are located in District 1 of San Francisco where I work and live; they comprise part of California's coastal lands; and they are administered by the Federal Government's US Fish and Wildlife Service. At present, traditional ideas about jurisdiction are not viable when considering climate chaos, for radical environmental disruption fails to respect: physical borders or boundaries; the responsibilities and rights claimed under singular jurisdictions; diverse, sprawling, terra-forma; confined bodies of water, or even human lives.

When we nurture a connection with the natural world, we come to understand our interdependence with all living beings. **Only by considering ecosystems as interlocking living tissue that does not correspond to borders, unique jurisdictions, or singular domains of research, will we create true, reparative, humane models of change.**

But because of Americans' historically ruthless relationship to the plant and animal world, within an economy that deems profits as guiding principles, our governments have been reticent, if not derelict, in recognizing the force of climate disruption over the past 40 years. Despite the fact that Congressional Hearings on this subject began with Rachel Carson's testifying about pesticide toxicity before the Senate in 1963. The problem of environmental poisoning stem not merely from Human recklessness, complacency and greed but also a lack of political will. In the face of Americans' dearth of moral rectitude, we need to protest as well as to envision a different kind of future. But by "doing too little, too late", all life is endangered now. As such, **the State of California has a moral responsibility and obligation to advocate across all jurisdictions.**

Present models of justice, however, place an undue burden on ordinary citizens, who lack adequate monies or the capacity to monitor and confront diverse public and private agencies, organizations, and institutions because such entities have

access to lawyers while their operations are largely clandestine. Most citizens are unable to fight for their own rights, let alone for the maintenance of the Commons, through legal means. As such, separative government agencies, whether local, state or national, cannot be allowed to enact decisions merely within singular jurisdictions or in silos, by claiming exclusive rights over jurisdictions that, nonetheless, permeate various land bodies and moving waters. Moreover, the Public's interests and values must be understood as inclusive and overlapping, rather than exclusive or conflictual. The primacy of understanding that the intersecting webs of relationships supersede borders, and far outstrip so-called private property rights and materialistic pursuits on a planet of finite resources, is of utmost importance now.

A**s systems are recognized as increasingly complex, we are compelled to accept additional perspectives, stricter moral codes, and better structured or layered principles. Within new systems understanding, in fact, comes the necessity of a new world view, one that recognizes the Planet's underlying reality, a conscious reality in which meaning-making is actually a function of the interconnectedness of all, sentient life** (Jeremy Lent, The Web of Meaning: Integrating Science and Wisdom to find our place in the Universe, *Share International Live*). **As Climate Disruption is the most urgent and important issue of our time, we thus must recognize that the old, unconscious, and thus reckless enterprises of the past must be abandoned and condemned, so that we can affirm, discover, and make manifest a truly healthy, sustainable world.**

Sincerely yours,

Ariane Eroy, Ph. D
716 20th Avenue
San Francisco, CA 94121

From:	Kay Taylor
To:	Energy@Coastal
Subject:	"Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)"
Date:	Friday, December 10, 2021 12:10:00 PM

The Farallon Islands ecosystem is a precious, fragile asset, especially for nesting pelagic birds. The USFW rodent eradication plan is carefully made to eradicate the invasive mouse problem without undue damage. Please grant a consistency determination for this important measure.

Thank you,

Kathleen Taylor, MD
Oakland, CA

From: Carol Baird
To: Energy@Coastal
Subject: FARALLON ISLAND MICE
Date: Friday, December 10, 2021 12:07:55 PM

PLEASE **APPROVE** THE USF&W SERVICE PLAN TO ERADICATE INVASIVE HOUSE MICE (MUS MUSCULUS) THAT ARE HIGHLY INVASIVE AND DESTRUCTIVE TO THE NATIVE WILDLIFE THERE. THEY ARE ENDANGERING THE ASHY STORM-PETREL, AND OTHER SEABIRDS THAT DEPEND ON THE ISLANDS,

GIVEN THAT THESE ISLANDS DO NOT HOUSE MAMMAL SPECIES OTHER THAN THE MICE, AND THAT THE SERVICE WILL PROTECT GULLS AND OWLS AND HERPS THAT MIGHT BE SUSCEPTIBLE TO THE RODENTICIDE, I FEEL THIS ACTION IS WARRANTED.

THANK YOU FOR YOUR GOOD WORK!

Carol Baird, PhD
Founder, CA Institute for Biodiversity
Secretary, Golden Gate Audubon Society

From:	Laurie Kossoff
To:	Energy@Coastal
Subject:	Public Comment on December 2021 Agenda Item Thursday 11b - CD-0006-21 (U.S. Fish and Wildlife Service, San Francisco)
Date:	Friday, December 10, 2021 4:41:05 PM

I am writing to urge you to approve the USFW mouse eradication project. This method has been shown to safely eradicate invasive mice from other fragile locations. The targeted use of rodenticide is thoroughly researched and designed to reduce all unnecessary harm to other wildlife on and around the islands.

As a member of the Golden Gate Audubon Society, I have heard from supporters and others concerned about this approach. I have come to agree that this is the only way, and best way, to correct the harm we have inadvertently caused by allowing mice to multiply on the island.

While I am an opponent of using rodenticides in neighborhoods, where rodenticides are dangerous, the well designed USFW plan is our best chance for eradicating mice from the South Farallon islands, where they threaten fragile bird species.

Laurie Kossoff
El Cerrito, CA

"The issues of civil rights cannot be separated from the issues of peace." Martin Luther King Jr.

"Yet what greater defeat could we suffer than to come to resemble the forces we oppose in their disrespect for human dignity?" Ruth Bader Ginsburg

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 10, 2021 4:41:06 PM

From: Laurie Kossoff <lauriekossoff@gmail.com>
Sent: Saturday, December 11, 2021 12:40:58 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 (U.S. Fish and Wildlife Service, San Francisco)

I am writing to urge you to approve the USFW mouse eradication project. This method has been shown to safely eradicate invasive mice from other fragile locations. The targeted use of rodenticide is thoroughly researched and designed to reduce all unnecessary harm to other wildlife on and around the islands.

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While I am an opponent of using rodenticides in neighborhoods, where rodenticides are dangerous, the well designed USFW plan is our best chance for eradicating mice from the South Farallon islands, where they threaten fragile bird species.

Laurie Kossoff
El Cerrito, CA

"The issues of civil rights cannot be separated from the issues of peace." Martin Luther King Jr.

"Yet what greater defeat could we suffer than to come to resemble the forces we oppose in their disrespect for human dignity?" Ruth Bader Ginsburg

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 10, 2021 4:47:02 PM

From: Diane Hichwa <dhichwa@earthlink.net>
Sent: Saturday, December 11, 2021 12:46:52 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 (U.S. Fish and Wildlife Service, San Francisco)"

I write as a birder, a coastal resident, active in supporting Greater Farallones national Marine Sanctuary and its expansion along the Sonoma/Mendocino coast protecting the upwelling so critical to wildlife, a participant in Beachwatch to document health of our beaches and wildlife in case of a damaging oil spill……

I certainly agree that we do need to correct the harm we have caused in bringing mice to the island.
But this **should not risk further and greater environmental harm** by using such a HIGHLY TOXIC chemical, brodifacoum, as proposed now.

In the current proposal such a very small amount of the concentrate---1.5 oz--- is enough to mix with a ton-and-a-half of bait carrier---consumed in the smallest amount by any mammal or seabird--- deadly in one feeding.

I urge the California Coastal Commission to choose contraception over killing with poison, for the health and well-being of all Farallones animal residents and for the health and well-being of our broader Greater Farallones National Marine Sanctuary and all of its wildlife. We want to keep our Ashy Storm-Petrel population safe and restore the balanced ecosystem on the Farallon Island.

We, my husband Bryant and I, are greatly concerned about impacts to ocean resources and are asking for a safer, non-toxic alternative.

We realize that money and time has gone into the proposal as it now stands. But that IT IS STILL A FLAWED AND INAPPROPRIATE ACTION in a SANCTUARY!!!!!

We hereby **ask the commission to deny this current USFWS plan.**
Diane and Bryant Hichwa

Diane Hichwa

Email: dhichwa@earthlink.net

Telephone: 707-785-1922 (Sea Ranch)
707-483-3130 (cell)
More Tail Wagging!!! Less Barking!!
Millie 2007

From:	Maureen Lahiff
To:	Farallon Islands Consistency
Subject:	it"s not a perfect world, but it will be better with Farallon Islands rodents gone
Date:	Friday, December 10, 2021 4:52:14 PM

Dear Coastal Commission,

I support the eradication of house mice on the Farallon Islands.

We may lose species if this is not done.

Yes, poison will be used, and animals will be killed.

But we made this mess, and now we need to clean it up.

Maureen Lahiff
3800 Maybelle Ave Apt 9
Oakland, CA 94619