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CORRESPONDENCE

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This document includes contents that were received to the farallonislands@coastal.ca.gov email inbox prior to the correspondence deadline of 5:00PM on December 10, 2021 but were unintentionally omitted from the original correspondence packet.

This item is a form letter sent to the Farallon Islands Consistency inbox from **1,046** separate contacts:

Support for Farallon Islands Mouse Eradication Plan

Dear California Coastal Commission,

I am writing to request that you vote in favor of the U.S. Fish and Wildlife Service's plan to remove invasive house mice from the Farallon Islands.

The introduction of invasive, non-native house mice to the Farallon Islands has caused significant disturbance to the islands' sensitive ecosystem. The house mice have direct and indirect harmful impacts on the islands' breeding seabirds, especially on Ashy Storm-Petrels, but also on Leach's Storm-Petrels, rare native salamander and cricket species, as well as on the native plants that support life on the islands.

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

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 U.S. Fish and Wildlife Service in the Final Environmental Impact Statement, published in March 2019.

With only 7,000 individuals remaining, the Ashy Storm-Petrel’s future may well depend on the successful eradication of house mice. Scientists predict that if mice are removed from the Farallones, the population of Ashy Storm-Petrels could increase by 37% over 20 years. Please be a part of ensuring a future for this rare species.

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

This item is a form letter sent to the Farallon Islands Consistency inbox from **34** separate contacts:

Stop the Poisoning of the Farallon Islands in California

Dear Farallon Islands,

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

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

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

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

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

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

Thank you for considering this request.