STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *GOVERNOR*
CALIFORNIA COASTAL COMMISSION
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Th11b

CD-0006-21 (USFWS)

DECEMBER 16, 2021

EX PARTE

EXPARTE COMMUNICATION DISCLOSURE FORM
Filed by Commissioner Donne Brownsey

1)Name or description of project: December 2021 Agenda Item Th b: Farallon Islands Mice Eradication project from US Fish and Wildlife service

2) Date and time of receipt of communication:
Dec 8, 2021,4pm- 4:45pm

3) Location of communication
On Zoom

4) Identity of person(s) initiating communication:
Sara Wan

5) Identity of person(s) on whose behalf communication was made:
Wan w/ Western Alliance for Nature, Richard Charter w/ Ocean Foundation

6) Identity of persons(s) receiving communication:
Donne Brownsey

7) Identity of all person(s) present during the communication:
Brownsey, Wan, Charter

Complete, comprehensive description of communication content:

The purpose of the meeting was to review the issues associated with the Farallon Islands mice eradication project. Wan and Charter agree on the state of island biodiversity and the need for invasive species eradication. They asserted that a contraception strategy is viable in the near future and this could be augmented with other strategies such as trapping . Further, it is their belief that the eradication using the poisoned bait delivered by helicopter and by hand application has too high an impact to non-target species. They oppose the USFW services project and feel that there are still too many unanswered questions re: the specific metrics for population impacts and effective levels of hazing. While they believe that the Farallons is an endangered species ecosystem, they do not believe the utilization of this deadly chemical is the appropriate solution to revive the biodiversity of the islands.

Date November 23, 2021

Donne Brownsey

Signature of Commissioner Donne Brownsey

Received on: 12/07/21

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: _____Dayna Bochco_____

1) Name or description of project: _Farallon Islands – Th 11b Fed Consistency_____

2) Date and time of receipt of communication: Mon Dec 6. 3:30pm – 4;20_____

3) Location of communication: _____Zoom_____

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: __Sara Wan and Richard Charter_____

_____

5) Identity of person(s) on whose behalf communication was made: _Farrollon Islands_____

_____

6) Identity of persons(s) receiving communication: ___Dayna Bochco_____

_____

7) Identity of all person(s) present during the communication: _Wan, Charter, Bochco_____

_____

_____

_____

_____see attached

_____

_____

_____

_____

___12-6-21_____ _____

Date Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

Farallon Isands Attachment –Th 11b

Ms Wan—Brodifacoum is the worst chemical being put in the worst place. There are alternatives, which staff dismisses without real analysis, or a combination of many of these alternative methods, which isn't analyzed at all. All the negative arguments staff makes against the alternatives could be applied to brodifacoum (Toxin). Staff argues that relocation the Burrowing owls is too disturbing to them, but how is it more disturbing than eating poison or poisoned prey.

The studies and ratio of failure of prior applications is muddled. On its face, staff says 700 of 1200 instances are successful – that is a 43% failure rate. The report cites rodent eradications at a 41% failure rate --- but mixes rats and mice eradications together --- and rat eradication is easier than mouse. The statistics cited are confusing at best.Where is the specifics on moouse eradication on other islands.

Ms Wan and Mr. Charter discussed prior island eradications that failed: Hawaii in 2017, Wake Island in 2012, Anacapa (cited as a success in staff report, which mr. Charter said was an attempt to eradicate rats and PRESERVE mice and thus, is not applicable here). All of these prior efforts had severe effects on wildlife and th ocean. They said that all monitering of these events stopped after 5 years so the truth of eradication isn't known.

There are 30,000 gulls on the island. 25% go back and forth to SF. Many will die in SF, but there is no way of accounting for those that die over the ocean.

Hazing is not proven effective. F&W would have to keep gulls away for 3 mos to ensure the poison is not active on the island. If, as EPA letter states, 90% can be kept away by hazing, and that 17oo gull deaths are acceptable, how do you reverse course once you approach 1700.

The monitoring conditions are insufficient. Mr. Charter served on the Sanctuary Council for the Farallons and helped draft the Enter and Injure provision which would fine anyone whose entry to the island injures wildlife. This eradication project meets the enter and injure conditions.

The monitoring condition is also not sufficient since the Applicant is the only group that can enter the island and is then monitoring themselves. They are exclusively reporting their results.

The Bait Spill Plan is not developed. Mr. Charter cites several instances where there has been spillage, and F&W didn't have a contingency plan. The method here is a primitive technique wherein a swingin buckt hangs from a helicopter. Spill are common.

All contingency plans need to be worked out before a permit is granted so the Commission can analyze. An Independent Monitor must be a condition of approval.

No discussion appears in the report of why it is ok to kill between 1,000 – 3,000 gulls, risk the ingestion of other wildlife of the poison or poisoned animals, poison washing into the ocean from rainfall (as it is proven will happen since rainfall runs downhill and is expected to "dilute" the poison on the island) --- why it is ok here and not in Malibu, not in many other LCP's and not in many states that are banning it's use

We are probably 2 years away from a good fertility control product. There are successful treatment for cats on the market now. If mice are concentrated on, can do it too. Why not use efforts to control the mouse population now until this more acceptable technique is on the market.

EXPARTE COMMUNICATION DISCLOSURE FORM
Filed by Commissioner Donne Brownsey

1)Name or description of project: December 2021 Agenda: Farallon Islands Mice Eradication project from US Fish and Wildlife service

2) Date and time of receipt of communication:
Nov 23, 2021,11am- 12pm

3) Location of communication
On Zoom

4) Identity of person(s) initiating communication:
Jay Ziegler with The Nature Conservancy (TNC)

5) Identity of person(s) on whose behalf communication was made:
A coalition of groups supporting the project including TNC, Point Blue Conservation Science (PBCS), Kito Impact Foundation (Kito), American Bird Conservancy (ABC)

6) Identity of persons(s) receiving communication:
Donne Brownsey

7) Identity of all person(s) present during the communication:
Brownsey, Ziegler, Gregg Howald (Kito), Pete Warzybok (PB Farallon leader), Brad Keitt (ABC), Zachary Warrow (PB), Nicholas Holmes (TNC, Oceans) Lucas Frerichs (TNC)

Complete, comprehensive description of communication content:

The purpose of the meeting was to review the issues associated with the Farallon Islands mice eradication project. The scientists and policy experts on the zoom followed a slide presentation (attached) on the state of island biodiversity and the need for invasive species eradication. They asserted that a contraception strategy is not viable at this time and regardless, only lasts a few months. Further, it is their belief that the eradication using the poisoned bait delivered by high tech helicopter delivery mechanism and hand applications can have a very high success rate with minimization of impact to non-target species. They support the USFW services project and believe that the uniqueness of the Farallons, the importance as a migrating bird resource and as an endangered species ecosystem require the administration of this poison to revive the biodiversity of the islands.

Date November 23, 2021 Donne Brownsey

Signature of Commissioner Donne Brownsey

Farallon Islands Restoration

November 2021

Who We Are and Why We're Here

Nick Holmes

Lead Scientist for Island Conservation, The Nature Conservancy

Gregg Howald

Island Conservation (formerly), 27 years of experience eradicating invasive species on ~50 islands

Brad Keitt

Director Oceans & Islands, American Bird Conservancy

Pete Warzybok

Farallon Program Manager, Point Blue Conservation Science

ISLANDS REPRESENT

5%

Of the Earth's landmass

UNEP-WCMC 2015

19%

Of avian biodiversity

Tershy et al. 2015

41%

Of all highly threatened terrestrial vertebrates

Spatz et al. 2017

75%

Of bird, amphibian, mammal, and reptile extinctions

Tershy et al. 2015

INVASIVE ALIEN SPECIES

86%

Implicated in 86% of all recorded extinctions on islands

Bellard et al. 2015

Farallon Islands Ecosystem in Crisis

Islands are a unique and special ecosystem

Wildlife threatened and ecosystem out of balance due to the presence of introduced mice

We must restore the islands to protect wildlife and enhance resiliency to climate change

Ashy Storm-petrel

Farallon Salamander

Native vegetation

Project Purpose

"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."

--Final EIS submitted by FWS, spring 2019

- USFWS conducted a rigorous NEPA process
- Aerial broadcast of brodifacoum is the only option
- Contraceptive baits are not a viable option.

Night and Day Difference

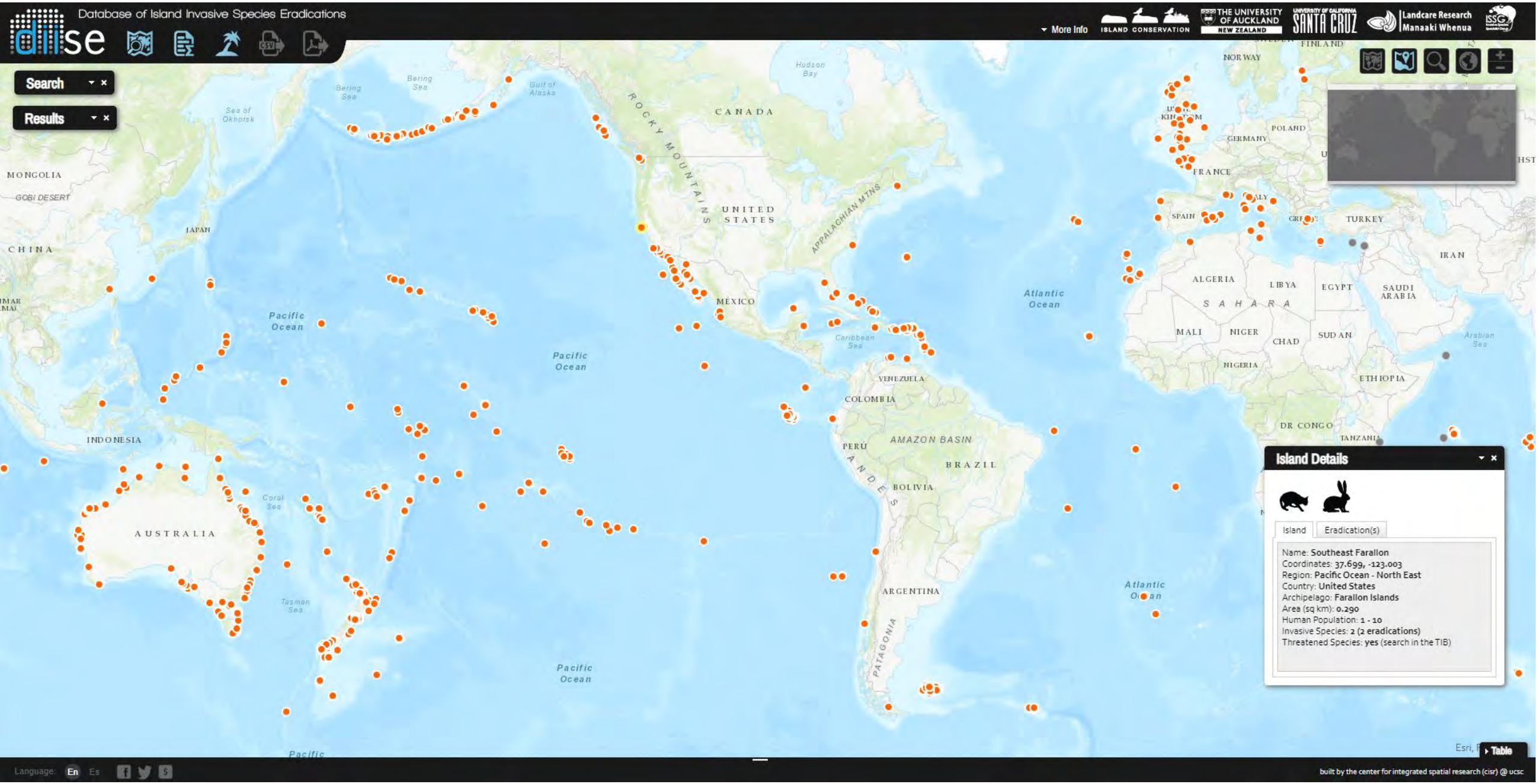
One-time conservation use
vs
Repeated use on mainland

The Choice

Do nothing and watch the Farallon ecosystem continue to suffer

OR

Take action and support eradication using a controlled, one-time use of rodenticide



diise.islandconservation.or

Anacapa Island

Scripps's murrelet

Ashy Storm-petrel

Howald et al 2009, Newton *et al.* (2016)

A Refuge Restored

Point Blue
Conservation
Science

Other Supporters of the Farallones Restoration

Point Blue Conservation Science

Ohlone Audubon Society

SEQUOIA AUDUBON SOCIETY

INTERNATIONAL BIRDRESCUE
EVERY BIRD MATTERS™

CALIFORNIA ACADEMY OF SCIENCES

Farallon Islands Foundation

NATIONAL Wildlife Refuge ASSOCIATION

Conservation Action League


Point Blue
Conservation
Science
Q&A
For more information:
RestoreTheFarallones.org

Received 10.30.2020

EXPARTE COMMUNICATION DISCLOSURE FORM
Filed by Commissioner Donne Brownsey

1) Name or description of project: Farallon Islands mice eradication permit to be heard at a future Commission meeting

2) Date and time of receipt of communication:
October 28, 2020, 7:00AM-5:00PM

3) Location of communication
By boat to and from and on Farallon Islands

4) Identity of person(s) initiating communication:
Gerry McChesney

5) Identity of person(s) on whose behalf communication was made:
US Fish and Wildlife Service

6) Identity of persons(s) receiving communication:
Donne Brownsey

7) Identity of all person(s) present during the communication:
Brownsey, Gerry McChesney, Manager Farallon Islands NWR USFWS, Chris Barr, USFWS, Commissioners Sara Aminzadeh, Caryl Hart, Katie Rice and Mike Wilson

Complete, comprehensive description of communication
content (attach complete set of any text or graphic material presented):

McChesney and Barr gave us a handout and provided a long presentation on the history of the island and the wildlife that is found there. They reviewed the impact of the mice on the various species, some of which are endangered and some of which are found only on the Farallon Islands. They articulated the impact of the rodenticide on the mouse population and the different alternatives that they explored and how they did not work either economically or practically including the possible contraceptive options. While on the island, they pointed out the natural world of plants, geology and wildlife and why the Farallons is such a unique and pivotal area for birds & marine animals including a rare salamander as well as rare plants. They assert that the wildlife there is absolutely being damaged by the scourge of house mice that must be eliminated in order to stop their predation of storm petrel & other bird eggs as well as Farallon insects and vegetation. Please see the attached Fact Sheet they provided for more details.

Commissioners asked a number of questions which they answered or directed us to documents that we could review. They were very clear that they saw the application of the rodenticide as the only effective way to kill a high enough percentage of the mice to

protect the endangered wildlife. They stated that while there would be incidental kills of wildlife not mice, that it was their view that the poisoning would be carefully scheduled to ensure maximum penetration to the target mouse community with as limited as could be impact on the other untargeted species.

Commissioners paid their own way for the boat trip and brought their own lunches. Commissioner and USFWS strictly observed Covid rules of wearing masks and socially distancing and we were outside for most of the time.

Date October 30, 2020

Donne Brownsey

Signature of Commissioner Donne Brownsey

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Conservation science for a healthy planet.

AMERICAN BIRD CONSERVANCY

Hope for the Farallon Islands: Restoring an Ecosystem in Peril

Key Points

- The introduction of invasive, non-native house mice to the Farallon Islands has caused **significant damage** to the islands' sensitive ecosystem.
- **100% eradication of the house mice population** is necessary for the ecosystem to recover.
- Invasive rodent removals have been successfully completed **on nearly 700 islands worldwide, with over 60 successful house mouse eradication efforts**. Nearly all these successful projects utilized techniques like that proposed for the South Farallon Islands.
- At present, there is only **one known method** that has proven effective for island mouse eradications, an aerial broadcast of the rodenticide Brodifacoum.
- The U.S. Fish and Wildlife Service has produced one of **the most thorough and scientifically rigorous environmental documents on record** to support this proposal.
- This project is **supported by leading conservation groups**, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Point Blue Conservation Science, and many others.

Background

The Farallon Islands National Wildlife Refuge, managed by the U.S. Fish and Wildlife Service (the Service), hosts the largest seabird breeding colony in the contiguous United States, with nearly 25% of California's breeding seabirds (more than 350,000 individuals of 13 species). Over the last 40 years, the Service has worked to restore the Farallones, including removing invasive plants and animals that have negatively impacted the island ecosystem. As an example, introduced invasive cats and rabbits were removed in the early 1970s, with positive ecological responses including the return of breeding rhinoceros auklets after a long absence.

Today, the invasive house mouse is the last invasive vertebrate remaining on the Farallones. These mice exist on the islands in plague-like levels – at times reaching as many as 500 mice per acre, one of the highest observed densities in the world. Their presence is negatively impacting rare and unique natural resources such as the ashy storm-petrel, other seabirds, Farallon arboreal salamanders, Farallon camel crickets, and the islands' vegetation. Threats to the rare ashy storm-petrel's declining population are of particular concern. This globally significant seabird is listed as "endangered" on the International Union for Conservation of Nature's "Red List."

The Solution

Invasive mice must be removed from the Farallones to protect wildlife and restore the ecosystem. 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. Land managers have successfully eradicated house mice from more than 60 islands worldwide. Nearly all these successful projects utilized techniques like those proposed for the South Farallon Islands house mouse eradication.

A Through and Transparent Review

In 2004, the Service began a thorough review of available options to remove mice from the islands. In March 2019, the Service published one of the most scientifically rigorous environmental planning documents on record for a rodent eradication. The Final Environmental Impact Statement (FEIS) represents over sixteen years of careful study, with a final report of 322 pages supported by an appendix 577 pages long. The Service initially reviewed 49 potential methods for the removal of mice before arriving at its final "preferred alternative": an aerial broadcast of the rodenticide Brodifacoum-25D Conservation. Before publishing the FEIS document, the Service reviewed each of the 553 public comments that were made on the Draft EIS and addressed all substantive comments in its final report.

Safe Implementation

Numerous mitigation measures will be employed to protect non-target species including project timing, gull hazing (to deter gulls from landing on the island), raptor and salamander capture, and specialized methods to protect the marine environment. Operations will follow best practices based on lessons learned from successful past eradications and there will be rigorous monitoring of the terrestrial and marine ecosystems.

Support from the Conservation Community

This project is supported by leading national and international conservation groups, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Pacific Seabird Group, Point Blue Conservation Science, and many others. Many local groups also support the project, including the California, Marin, Golden Gate, Sequoia, and Ohlone Audubon Societies; The Oceanic Society; International Bird Rescue; Citizens Committee to Complete the Refuge; and the Farallon Islands Foundation, among others.

Conclusion

The Service has the responsibility to restore the islands' ecosystem for the many species that rely on it. We invite you to learn more and join us as we continue to restore and protect your Farallon Islands National Wildlife Refuge. To learn more about the Farallon Islands Restoration Project, go to http://restorethefarallones.org/ or https://www.fws.gov/refuge/farallon_islands/. You can watch an archived webinar about the project at http://bit.ly/FarallonRestorationWebinar.

Received 11.03.2020

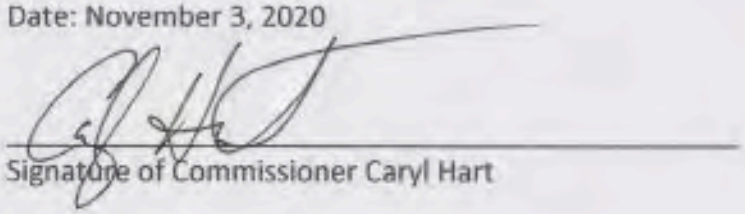
Ex Parte Communication Disclosure Form
Filed by Commissioner Caryl Hart

1. Name or Description of Project: Farallon Islands mice eradication permit currently unscheduled for Commission review
2. Date and time of reported communication: October 28, 2020. 7:00 am- 5:00 pm
3. Location of communication: On boat and during tour of Farallon Islands
4. Identity of person(s) initiating: Gerry McChesney
5. Identity of person(s) on whose behalf communication was made: US Fish and Wildlife Service
6. Identity of all persons present during the communication: Commissioners Donne Brownsey, Katie Rice, Mike Wilson, Sara Aminzadeh and Caryl Hart. Gerry McChesney, Manager Farallon Islands NWR USFWS, Chris Barr USFWS.
7. Complete, comprehensive description of communication content and complete set of any text or graphic material presented.

   McChesney and Barr gave us a handout and provided a long presentation on the history of the island and the birds and other wildlife found there. They reviewed the impact of mice infestation on the various species, including those endemic to the Farallon Islands. They discussed the types of potential rodenticides, including the preferred approach, and the impacts on the mouse population as well as the bird and wildlife populations, and mitigation of impacts. They also reviewed possible approaches to sterilization of the mouse population and that it is unproven and would require continuous application if it was even determined to be possible. Commissioners asked a number of questions along the lines of what is described above and were given an explanatory document which is attached. Mr. McChesney stated that the application of the identified rodenticide was the only effective way to rid the Farallones of the invasive mouse population, and that this approach has proven to be effective on rat and mice infestations on hundreds of other islands, including Anacapa off the California coast.

   Commissioners paid their own way for the boat trip and brought their own lunches. All Covid protocols were observed throughout.

Date: November 3, 2020



Signature of Commissioner Caryl Hart

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AMERICAN BIRD CONSERVANCY

Hope for the Farallon Islands: Restoring an Ecosystem in Peril

Key Points

- The introduction of invasive, non-native house mice to the Farallon Islands has caused **significant damage** to the islands' sensitive ecosystem.
- **100% eradication of the house mice population** is necessary for the ecosystem to recover.
- Invasive rodent removals have been successfully completed on nearly 700 islands **worldwide, with over 60 successful house mouse eradication efforts**. Nearly all these successful projects utilized techniques like that proposed for the South Farallon Islands.
- At present, there is only **one known method** that has proven effective for island mouse eradications, an aerial broadcast of the rodenticide Brodifacoum.
- The U.S. Fish and Wildlife Service has produced one of **the most thorough and scientifically rigorous environmental documents on record** to support this proposal.
- This project is **supported by leading conservation groups**, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Point Blue Conservation Science, and many others.

Background

The Farallon Islands National Wildlife Refuge, managed by the U.S. Fish and Wildlife Service (the Service), hosts the largest seabird breeding colony in the contiguous United States, with nearly 25% of California's breeding seabirds (more than 350,000 individuals of 13 species). Over the last 40 years, the Service has worked to restore the Farallones, including removing invasive plants and animals that have negatively impacted the island ecosystem. As an example, introduced invasive cats and rabbits were removed in the early 1970s, with positive ecological responses including the return of breeding rhinoceros auklets after a long absence.

Today, the invasive house mouse is the last invasive vertebrate remaining on the Farallones. These mice exist on the islands in plague-like levels – at times reaching as many as 500 mice per acre, one of the highest observed densities in the world. Their presence is negatively impacting rare and unique natural resources such as the ashy storm-petrel, other seabirds, Farallon arboreal salamanders, Farallon camel crickets, and the islands' vegetation. Threats to the rare ashy storm-petrel's declining population are of particular concern. This globally significant seabird is listed as "endangered" on the International Union for Conservation of Nature's "Red List."

The Solution

Invasive mice must be removed from the Farallones to protect wildlife and restore the ecosystem. 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. Land managers have successfully eradicated house mice from more than 60 islands worldwide. Nearly all these successful projects utilized techniques like those proposed for the South Farallon Islands house mouse eradication.

A Through and Transparent Review

In 2004, the Service began a thorough review of available options to remove mice from the islands. In March 2019, the Service published one of the most scientifically rigorous environmental planning documents on record for a rodent eradication. The Final Environmental Impact Statement (FEIS) represents over sixteen years of careful study, with a final report of 322 pages supported by an appendix 577 pages long. The Service initially reviewed 49 potential methods for the removal of mice before arriving at its final "preferred alternative": an aerial broadcast of the rodenticide Brodifacoum-25D Conservation. Before publishing the FEIS document, the Service reviewed each of the 553 public comments that were made on the Draft EIS and addressed all substantive comments in its final report.

Safe Implementation

Numerous mitigation measures will be employed to protect non-target species including project timing, gull hazing (to deter gulls from landing on the island), raptor and salamander capture, and specialized methods to protect the marine environment. Operations will follow best practices based on lessons learned from successful past eradications and there will be rigorous monitoring of the terrestrial and marine ecosystems.

Support from the Conservation Community

This project is supported by leading national and international conservation groups, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Pacific Seabird Group, Point Blue Conservation Science, and many others. Many local groups also support the project, including the California, Marin, Golden Gate, Sequoia, and Ohlone Audubon Societies; The Oceanic Society; International Bird Rescue; Citizens Committee to Complete the Refuge; and the Farallon Islands Foundation, among others.

Conclusion

The Service has the responsibility to restore the islands' ecosystem for the many species that rely on it. We invite you to learn more and join us as we continue to restore and protect your Farallon Islands National Wildlife Refuge. To learn more about the Farallon Islands Restoration Project, go to http://restorethefarallones.org/ or https://www.fws.gov/refuge/farallon_islands/. You can watch an archived webinar about the project at http://bit.ly/FarallonRestorationWebinar.

Received 11.03.2020

Ex Parte Communication Disclosure

Filed by: Commissioner Katie Rice

Re: US/Fish and Wildlife Service Farallon Islands Mice Eradication project

Day/time: October 28, 2020, 7 a.m. to 5 p.m.

Type of communication/Location: Field trip – by boat to and from Farallon Islands

Initiator of communication: Gerry McChesney, Manager Farallon Islands NWR USFWS on Behalf of US Fish and Wildlife Service

Identity of all persons present during communication: Katie Rice; Gerry McChesney, Manager Farallon Islands NWR USFWS; Chris Barr, USFWS; CC Commissioners: Sara Aminzadeh, Caryl Hart, Donne Brownsey, Mike Wilson

Comprehensive Description of communication content:

McChesney and Barr provided information history of the island pre and post becoming part of NWR, overview of islands unique ecosystem and habitat, flora and fauna, native and non-native with specific emphasis on rare plants and animals, and the role the Farallons play in supporting populations endemic to the island as well as those which depend on it as feeding/breeding/or resting grounds. They reviewed history of presence of non native house mice population on the island, its life cycle and direct and indirect impact on the other species and island ecosystem in general. Specifically they cited impacts to island storm petral vis a vis the extended presence of owls on the island which is directly associated with presence of house mice. They also discussed other impacts including to rare island salamander. They reviewed history of current mice eradication proposal, various alternatives studied in EIR, effectiveness and impacts of alternatives, proposed measures to mitigate potential impacts on non-target species with regards to the rodenticide proposal which they believe from studies and analysis and similar rodent eradication projects on islands as the only effective way to eradicate the house mice population. They described the methodology, timing (seasonal and weather considerations), and mitigation action proposed and reasoning for same. (See attached fact sheet.)

All present on the field trip observed COVID guidelines around masking, distancing, washing etc. Additionally, commissioners paid for their personal trip costs and brought their own lunches.

Date: 11/3/2020 **Signature:** Katie Rice

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AMERICAN BIRD CONSERVANCY

Hope for the Farallon Islands: Restoring an Ecosystem in Peril

Key Points

- The introduction of invasive, non-native house mice to the Farallon Islands has caused **significant damage** to the islands' sensitive ecosystem.
- **100% eradication of the house mice population** is necessary for the ecosystem to recover.
- Invasive rodent removals have been successfully completed **on nearly 700 islands worldwide, with over 60 successful house mouse eradication efforts**. Nearly all these successful projects utilized techniques like that proposed for the South Farallon Islands.
- At present, there is only **one known method** that has proven effective for island mouse eradications, an aerial broadcast of the rodenticide Brodifacoum.
- The U.S. Fish and Wildlife Service has produced one of **the most thorough and scientifically rigorous environmental documents on record** to support this proposal.
- This project is **supported by leading conservation groups**, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Point Blue Conservation Science, and many others.

Background

The Farallon Islands National Wildlife Refuge, managed by the U.S. Fish and Wildlife Service (the Service), hosts the largest seabird breeding colony in the contiguous United States, with nearly 25% of California's breeding seabirds (more than 350,000 individuals of 13 species). Over the last 40 years, the Service has worked to restore the Farallones, including removing invasive plants and animals that have negatively impacted the island ecosystem. As an example, introduced invasive cats and rabbits were removed in the early 1970s, with positive ecological responses including the return of breeding rhinoceros auklets after a long absence.

Today, the invasive house mouse is the last invasive vertebrate remaining on the Farallones. These mice exist on the islands in plague-like levels – at times reaching as many as 500 mice per acre, one of the highest observed densities in the world. Their presence is negatively impacting rare and unique natural resources such as the ashy storm-petrel, other seabirds, Farallon arboreal salamanders, Farallon camel crickets, and the islands' vegetation. Threats to the rare ashy storm-petrel's declining population are of particular concern. This globally significant seabird is listed as "endangered" on the International Union for Conservation of Nature's "Red List."

The Solution

Invasive mice must be removed from the Farallones to protect wildlife and restore the ecosystem. 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. Land managers have successfully eradicated house mice from more than 60 islands worldwide. Nearly all these successful projects utilized techniques like those proposed for the South Farallon Islands house mouse eradication.

A Through and Transparent Review

In 2004, the Service began a thorough review of available options to remove mice from the islands. In March 2019, the Service published one of the most scientifically rigorous environmental planning documents on record for a rodent eradication. The Final Environmental Impact Statement (FEIS) represents over sixteen years of careful study, with a final report of 322 pages supported by an appendix 577 pages long. The Service initially reviewed 49 potential methods for the removal of mice before arriving at its final "preferred alternative": an aerial broadcast of the rodenticide Brodifacoum-25D Conservation. Before publishing the FEIS document, the Service reviewed each of the 553 public comments that were made on the Draft EIS and addressed all substantive comments in its final report.

Safe Implementation

Numerous mitigation measures will be employed to protect non-target species including project timing, gull hazing (to deter gulls from landing on the island), raptor and salamander capture, and specialized methods to protect the marine environment. Operations will follow best practices based on lessons learned from successful past eradications and there will be rigorous monitoring of the terrestrial and marine ecosystems.

Support from the Conservation Community

This project is supported by leading national and international conservation groups, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Pacific Seabird Group, Point Blue Conservation Science, and many others. Many local groups also support the project, including the California, Marin, Golden Gate, Sequoia, and Ohlone Audubon Societies; The Oceanic Society; International Bird Rescue; Citizens Committee to Complete the Refuge; and the Farallon Islands Foundation, among others.

Conclusion

The Service has the responsibility to restore the islands' ecosystem for the many species that rely on it. We invite you to learn more and join us as we continue to restore and protect your Farallon Islands National Wildlife Refuge. To learn more about the Farallon Islands Restoration Project, go to http://restorethefarallones.org/ or https://www.fws.gov/refuge/farallon_islands/. You can watch an archived webinar about the project at http://bit.ly/FarallonRestorationWebinar.

Received 11/5/2020

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Mike Wilson, CA Coastal Commissioner

1) Name or description of project: USFWS Farallon Islands Rodent Control Program

2) Date and time of receipt of communication: 10/28/20 – 7:00 a.m. – 4:30 p.m.

3) Location of communication: Boat to/from Farallon Islands and on the Island (Emeryville)

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Commissioner Wilson reached out to Gerry McCheney after being notified of the tour.

5) Identity of person(s) on whose behalf communication was made: Commissioner Mike Wilson.

6) Identity of persons(s) receiving communication: Commissioners Aminzadeh, Hart, Brownsey, Rice, Wilson.

7) Identity of all person(s) present during the communication: Commissioners Brownsey, Aminzadeh, Hart, Rice, Wilson, Gerry McChesney (USFWS), Chris Barr (USFWS), Jim Tietz with Point Blue.

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Discussed the desire of USFWS to use a rodenticide to eliminate rodents on the island using areal applications of pellets. Talked about many direct and indirect impacts of the invasive mice on the island to native birds, plants, insects and amphibian species. We also discussed some alternative methods of rodent control including contraceptives. Also of note were the numerous mice I observed during the tour.

11/5/20
Date

Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

Received 11.03.2020

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Sara Aminzadeh

1) Name or description of project: forthcoming Farallon Island mouse er

2) Date and time of receipt of communication: 10/28/2020 7am-5pm

3) Location of communication: by boat in person

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Gerry McChesney, Fish and Wildlife Service

5) Identity of person(s) on whose behalf communication was made: Fish and Wildlife Service

6) Identity of persons(s) receiving communication: Sara Aminzadeh

7) Identity of all person(s) present during the communication: Chris & Gerry (USF Cmsrs. Aminzadeh, Rice, Brownsey, Hart, Wilson other biologists & boat captains

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

The Service offered history and context of the Island, the different management and ecologic challenges and species needs. They described their process to vet different mouse eradication strategie including the use of less toxic options and descri that the option previously before the Commission wa the only viable option. The Service answered Comm questions about why other options couldn't work

11/3/2020
Date

Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

Point Blue
Conservation science for a healthy planet.

AMERICAN BIRD CONSERVANCY

Hope for the Farallon Islands: Restoring an Ecosystem in Peril

Key Points

- The introduction of invasive, non-native house mice to the Farallon Islands has caused **significant damage** to the islands' sensitive ecosystem.
- **100% eradication of the house mice population** is necessary for the ecosystem to recover.
- Invasive rodent removals have been successfully completed **on nearly 700 islands worldwide, with over 60 successful house mouse eradication efforts**. Nearly all these successful projects utilized techniques like that proposed for the South Farallon Islands.
- At present, there is only **one known method** that has proven effective for island mouse eradications, an aerial broadcast of the rodenticide Brodifacoum.
- The U.S. Fish and Wildlife Service has produced one of **the most thorough and scientifically rigorous environmental documents on record** to support this proposal.
- This project is **supported by leading conservation groups**, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Point Blue Conservation Science, and many others.

Background

The Farallon Islands National Wildlife Refuge, managed by the U.S. Fish and Wildlife Service (the Service), hosts the largest seabird breeding colony in the contiguous United States, with nearly 25% of California's breeding seabirds (more than 350,000 individuals of 13 species). Over the last 40 years, the Service has worked to restore the Farallones, including removing invasive plants and animals that have negatively impacted the island ecosystem. As an example, introduced invasive cats and rabbits were removed in the early 1970s, with positive ecological responses including the return of breeding rhinoceros auklets after a long absence.

Today, the invasive house mouse is the last invasive vertebrate remaining on the Farallones. These mice exist on the islands in plague-like levels – at times reaching as many as 500 mice per acre, one of the highest observed densities in the world. Their presence is negatively impacting rare and unique natural resources such as the ashy storm-petrel, other seabirds, Farallon arboreal salamanders, Farallon camel crickets, and the islands' vegetation. Threats to the rare ashy storm-petrel's declining population are of particular concern. This globally significant seabird is listed as "endangered" on the International Union for Conservation of Nature's "Red List."

The Solution

Invasive mice must be removed from the Farallones to protect wildlife and restore the ecosystem. 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. Land managers have successfully eradicated house mice from more than 60 islands worldwide. Nearly all these successful projects utilized techniques like those proposed for the South Farallon Islands house mouse eradication.

A Through and Transparent Review

In 2004, the Service began a thorough review of available options to remove mice from the islands. In March 2019, the Service published one of the most scientifically rigorous environmental planning documents on record for a rodent eradication. The Final Environmental Impact Statement (FEIS) represents over sixteen years of careful study, with a final report of 322 pages supported by an appendix 577 pages long. The Service initially reviewed 49 potential methods for the removal of mice before arriving at its final "preferred alternative": an aerial broadcast of the rodenticide Brodifacoum-25D Conservation. Before publishing the FEIS document, the Service reviewed each of the 553 public comments that were made on the Draft EIS and addressed all substantive comments in its final report.

Safe Implementation

Numerous mitigation measures will be employed to protect non-target species including project timing, gull hazing (to deter gulls from landing on the island), raptor and salamander capture, and specialized methods to protect the marine environment. Operations will follow best practices based on lessons learned from successful past eradications and there will be rigorous monitoring of the terrestrial and marine ecosystems.

Support from the Conservation Community

This project is supported by leading national and international conservation groups, including American Bird Conservancy, National Audubon Society, The Nature Conservancy, Pacific Seabird Group, Point Blue Conservation Science, and many others. Many local groups also support the project, including the California, Marin, Golden Gate, Sequoia, and Ohlone Audubon Societies; The Oceanic Society; International Bird Rescue; Citizens Committee to Complete the Refuge; and the Farallon Islands Foundation, among others.

Conclusion

The Service has the responsibility to restore the islands' ecosystem for the many species that rely on it. We invite you to learn more and join us as we continue to restore and protect your Farallon Islands National Wildlife Refuge. To learn more about the Farallon Islands Restoration Project, go to http://restorethefarallones.org/ or https://www.fws.gov/refuge/farallon_islands/. You can watch an archived webinar about the project at http://bit.ly/FarallonRestorationWebinar.