

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 228
SAN FRANCISCO, CA 94105-2219
FAX (415) 904-5400
TDD (415) 597-5885



Th11b

CD-0006-21 (USFWS)

DECEMBER 16, 2021

**Second Compilation of
Disclosure Forms for
Ex Parte Communications**

Ex Parte Communication Disclosure

Filed by: Katie Rice
Re: Farallon Mouse Eradication
Day/Time: Wednesday December 8, 2021 1:30 – 2 p.m.
Type of Communication: virtual/zoom meeting
Initiator of Communication: Sara Wan
Participants: Katie Rice, Sara Wan

Comprehensive Description of Communication Content:

Ms. Wan shared her concerns with various aspects of project as proposed and process and analysis to date. Including: Objection of use of rodenticide generally, adequacy of alternatives analysis, particularly viability of fertility control, insufficient level of detail and adequacy of operational, mitigation, contingency and monitoring plans; she questioned the analysis of impact to non-target species, particularly gulls, and expressed her overall opinion that project has still not been fully analyzed and all questions have not been answered, and hence project as proposed should not move forward.

Date: Dec. 13, 2021 Signature: 

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Caryl Hart, PhD

1) Name or description of project: South Farallon Islands mouse eradication

2) Date and time of receipt of communication: 12/3/21. 11:30 am

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

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

5) Identity of person(s) on whose behalf communication was made: Sara Wan, Richard

6) Identity of persons(s) receiving communication: Caryl Hart

7) Identity of all person(s) present during the communication: Sara Wan,
Richard Charter, Caryl Hart

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented): Discussion of proposed mouse eradication project on the South Farallon Islands. Discussion of harm from brodifacoum as worse possible type of rodenticide that could be used, that alternatives should be tried prior to this plan proceeding, particularly fertility control. Statistics of current threats challenged as inaccurate, need to look beyond mice eradication to spillover effects, Ashy storm petrels doing well on other islands, Anacapa not an analog since focus was rats and not mice and island not similar enough, need for good independent monitoring not linked to any group managing this plan or the island. Bait spill plan not updated since 2019. Disagree with drop before rains and impact.

12/8/21
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.

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Caryl Hart, PhD

1) Name or description of project: South Farallons mice eradication project

2) Date and time of receipt of communication: 12/8/21 4pm

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: Jay Ziegler The Nature Conservancy

5) Identity of person(s) on whose behalf communication was made: See identity list

6) Identity of persons(s) receiving communication: Caryl Hart

7) Identity of all person(s) present during the communication: Jay Ziegler, Zachary Warnow, Nick Holmes, Brad Keitt, Pete Warzybok, Lucas Frerichs, Gregg Howald

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

12/8/21
Date


Signature of Commissioner

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Zachary Warnow, gave an overview. Pt Blue has been there day in and day out monitoring for decades.

Nick Holmes- team has decades of experience on conservation on islands
TNC manages a variety of islands and has used this strategy. Has worked with USFWS on many projects
Islands represent high rate of extinctions and invasive species. The species on islands did not evolve with other introduced species.

Pete Warzybok has spent 23 years working on Farallons. Invasive mice have thrown entire native ecosystem out of balance. Preying on crickets and salamanders. Competing with native resources. Altering physical makeup of island, by spreading seed and other physical manifestations. Population decline in endemic species including storm petrels. Getting worse and will continue to decline from climate change.

Goal is to eradicate mice completely. One true way to restore ecosystem.

Brad Keitt American Bird Conservancy- lack of other options. USFWS considered over 40 different options. Efficacy and safety. Contraceptive baits not a viable option.
Do not put support behind this lightly. They have fought for reduction/elimination of brodifacoum. One time conservation use. Strongly support USFWS here.

History of use of this process. Over 700 rat and mice eradication on islands. 95% success rate.
Anacapa Island project excellent analog. Very similar topography and issues. NPS, State and private NGO's. Implemented successfully 2001-02 and completely successful with major increase in Scripps murrelet and Ashy storm petrel coming to the island for the first time. Major conservation success.

Q&A

Mouse decline seasonal – flooded out, hypothermia. Crash in populations, vegetation gone. Food source declining. Population comes back in spring. Range of number of burrowing owls from 6 to 15, normal migration, find island and decide to stay. Overwinter on island. Can kill hundreds of ash storm petrels during their time on the island. Becomes migratory trap for burrowing owls when they stop there. Once they stop, then they stay.

Mice are having huge impact on the ecosystem as a whole. Each time native species is restored, see major recovery of the ecosystem. Surprises occur, potential for other species to inhabit island. Part of 50 year recovery story.

Hazing trials on island discussion including impacts of hazing on other species, on gulls and pinnipeds. Wide variety of tools available- could use drones to scare gulls off. Direct and focused efforts to areas that gulls are at a given time.

Gulls don't feed on the island, minimal gulls seeking out the bait. Two breeding pairs of ash storm petrels are there now but normally gone by early December.

Gregg Howard- bait is highly attractive to rodents. Designed to go onto ground and be attractive to mice. Bait is designed to rapidly dissolve with water and moisture, swell and dry cycle lead to breakdown. Molds and fungus break down rodenticide, no toxic metabolites. Microbial degradation. Breakdown depends on where it sits, this rodenticide not water soluble. Hydrophobic, binds to organic matter. 120 to 180 day half life.

Worse case scenario discussion- project fails is worse case scenario, if it fails or does not go ahead. Facing continued deaths of threatened organisms.

Relocate burrowing owls during this plan to avoid impacts.

Sterilization not effective- Brad Keitt- no indication that current technology would lead to complete eradication. They have discussed with Dr. Meyer. And she agrees that will not achieve eradication.

Poison will only be on the ground for 3-4 days. Uptake by mice, redundancy in hazing.

Successfully removed mice on other islands- success rate is 90%. Has been used 70 plus years.

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



Signature of Commissioner Donne Brownsey

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: _____ Dayna Bochco _____

1) Name or description of project: ___Th 11b Farallon Island /Science Briefing_____

2) Date and time of receipt of communication: _Dec 8. 3:30 4:05_____

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: _Point Blue: Peter Warybok, Zach Warnolk Nature
_Nicholas Homas; Brad Keitt and Gregg Howald American Bird Conserancy_____

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

6) Identity of persons(s) receiving communication:

___Bochco_____

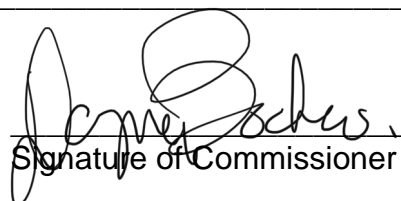
7) Identity of all person(s) present during the communication: _____

_____ listed above _____

_____ see
attached _____

12/8/21

Date



Signature of Commissioner

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The group showed me a 10 min presentation of slides about the project and then opened the meeting to my questions. My questions concerned: how do you keep the poison from running down the steep slopes and onto the beach and into the ocean; how do you protect the burrowing owls and other wildlife that eat the mice; how does hazing work; how long does the poison last and what happens to it once applied? Their answers pretty much followed the staff report. Although, they did explain that the poison, if not eaten, will turn to mush and be absorbed in the soil. Unless an animal is a soil eater, no ingestion could then happen. Also, there are only about a dozen or so burrowing owls, and the scientists know where they are, so not that hard to trap and relocate. The hazing method is described in the FEIS and I asked they send me page ### so I could read it.

They said that since the goal of the project is to eradicate mice permanently, none of the alternative methods could now achieve that. I mentioned that I thought a combination of methodologies over time --- the mice have been there for 200 years, why not combine culling and sterilizing over time --- but that would not end in eradication anytime soon. This is the most efficient and less costly method