



July 3, 2019

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

To the California Coastal Commission:

The Pacific Seabird Group (PSG) is writing this letter in strong support of the proposed South Farallon Islands Invasive House Mouse Eradication Project. PSG is an international, non-profit professional organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Japan, China, Malaysia, Australia, New Zealand, Peru, Chile and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. PSG members serve as scientific experts and conservation leaders within their local communities, nationally and around the world.

Invasive species are considered to be one of the greatest threats confronting global biodiversity. The threats posed by invasive species, particularly rodents and feral cats, are even more pronounced on islands, where they have been a major driver of extinctions of island species. Given their life histories and dependence on mammal-free islands for breeding, many seabird species are particularly vulnerable to the impacts of invasive mammals. Eradication of invasive mammals from islands is a well-documented and highly successful method for protecting species and natural ecosystem processes on islands.

In 2013, PSG previously provided a letter supporting Alternative B to the US Fish and Wildlife Service during the Draft Environmental Impact Statement comment period, citing the significant conservation benefits that would be accrued from the project and the fact that the proposed method of eradication has been used successfully on dozens of islands worldwide, including Anacapa Island in the Channel Islands National Park. Our position remains consistent in support of the project, and we summarize our major arguments below.

Introduced rodents, including house mice, have had devastating impacts on islands worldwide. On the Farallon Islands, house mice have significant negative impacts at the level of both species and ecosystems. House mice have had documented impacts on the islands' breeding seabird community, one of the most significant and diverse in the contiguous United States, as well as on

native salamanders, an endemic species of cricket, other native invertebrates and the native plant community.

One of the priority seabird species on the islands is the Ashy Storm-petrel (*Oceanodroma homochroa*), one of the rarest species of storm-petrels in the world. The breeding population of Ashy Storm-petrels, endemic to the Southern California Current System and globally listed by the IUCN as Endangered and declining, is directly impacted by predation by house mice. In addition, the removal of house mice would result in significant benefits to other burrow- and ground-nesting seabirds on the South Farallon Islands, including Leach's Storm-petrel (*Oceanodroma leucorhoa*), another species of conservation concern in the California Current.

Although ongoing control of invasive species can mitigate their impacts, eradication is the most effective method to recover insular ecosystems. A compelling example is the successful rat eradication on Anacapa Island in 2002 that has resulted in significant recovery of the target seabird species, Scripps's Murrelet (*Synthliboramphus scrippsi*), globally listed as Vulnerable, as well as of the island's terrestrial plant communities.

The second generation anticoagulant Brodifacoum has been used successfully in invasive rodent eradication programs for more than 25 years. It is the only known and documented method for eliminating invasive rodents, as explicitly stated in the US Fish and Wildlife Service Final Environmental Impact Statement published in March 2019. The technique of systematically deploying poisoned bait from a helicopter was developed by New Zealand conservationists and has been employed in all successful invasive rodent removal programs.

The US Fish and Wildlife Service (USFWS), with Point Blue Conservation Science collaborating as a science partner, produced a thorough and scientifically rigorous EIS based on more than a decade of focused study on the benefits as well as issues associated with the proposed eradication. Prior to publication of the final EIS document, reviewed all of the 553 public comments and addressed all substantive comments in the final version of the EIS.

While PSG, consistent with the assessment included in the EIS, acknowledges that there are risks attendant with the application of Brodifacoum in terms of incidental short-term mortality of non-target species and other unintended consequences, we firmly accept the premise that significant long-term conservation and restoration benefits will accrue, and those benefits will enhance the conservation status of species of concern as well as the long-term ecological resilience of the ecosystems of the South Farallon Islands.

To put the proposed project in a broader context, invasive rodent removals have been completed successfully on nearly 700 islands worldwide, including the aforementioned project on Anacapa Island in the Channel Islands National Park and islands in New Zealand, Mexico, and the Galápagos Islands. Of those rodent eradications, more than 60 have involved the successful removal of house mice, the vast majority of which have used comparable techniques to those proposed for the South Farallon Islands.

Given the extensive record of rodent removal projects globally, best practices are now well established. PSG is confident that the USFWS will follow best practices derived from the more

than 60 successful mouse eradication projects around the world and will take the precautionary measures outlined in the final EIS to minimize potential short-term negative impacts due to the eradication. The USFWS and its cooperators have the collective expertise as well as the commitment to safety and environmental protection to complete the project successfully and, as such, advance the conservation status of the South Farallon Islands ecosystem.

Thank you, and please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Peter J. Hodum".

Peter Hodum, Ph.D.

Vice-Chair for Conservation