



Letter in support of USFWS Mouse Eradication Plan for Southeast Farallon Island

Dear California Coastal Commission,

We are writing this letter in support of the plan outlined by the US Fish and Wildlife Service (McChesney et al., 2019) to eradicate invasive house mice from Southeast Farallon Island. Our thoughts on this proposed action are summarized below:

- Our deepest gratitude to the California Coastal Commission for its attention to maintaining the quality of our precious coast and its resources. As an organization that provides medical and rehabilitative care to hundreds to thousands of California's seabirds each year, many of whom have been adversely affected by human activities, we appreciate your efforts to maintain the environmental quality of our coast in perpetuity.
- As a science-based organization, we also wish to express our deep respect and gratitude to both the U.S. Fish and Wildlife Service and Point Blue Conservation Science for their effective work to reverse anthropogenic degradation of the wildlife habitats found on the Farallon Islands. These islands host a vibrant ecosystem that offers much needed resting and breeding habitat to seabirds and marine mammals, while supporting endemic amphibians, invertebrates, and plants on land and a rich marine community in the water.
- We acknowledge that anti-coagulant rodenticides are a serious environmental problem on the mainland that cause severe adverse effects in terrestrial carnivores including raptors, mammalian carnivores, and other non-target animals that may eat poison bait or ingest poisoned rodents. Our colleagues in wildlife rehabilitation who treat these poisoned animals are understandably concerned about rodenticides being used in the environment. These poisons cause pain, suffering, and death in wild animals on the mainland, and stress and moral pain in their caregivers. However, the use of a second-generation anti-coagulant rodenticide in an island setting like the Farallon Islands is fundamentally different from chronic mainland usage. It is a one-time application for conservation purposes that is unlikely to contribute to toxicities observed on the mainland. Successful eradication of the rodents will remove the suffering and other detrimental effects their presence inflicts on the other species, much like when we apply a medication (i.e., poison) to a wild animal to remove lice, fleas, parasitic worms, or ticks. Like an island ecosystem, individual wild animals can sometimes continue to survive with heavy infestations, but removing them improves the ability to heal injury by removing energetic drains on metabolic resources.
- As an organization that treats literally hundreds of Western Gulls from the mainland each year in both northern and southern California, we have not seen problems with anticoagulants in this species, despite their living in areas where rodenticides have been in use for decades. Although it is possible that affected birds die prior to us receiving them,



numerous Western Gull patients are rescued from urban areas where they might be expected to eat poisoned rodents or exposed bait (e.g. downtown San Francisco or Los Angeles). Although our patients have not been tested for anticoagulant residues, and as such, low levels of contamination may be undetected, we cannot recall or find in our database any suggestion of a Western Gull with evidence of a coagulopathy.

Our respect for the expertise of the organizations that study and manage the Farallon Islands prompts us to find the eradication plan acceptable, if its proposed mitigations against potential adverse impacts to non-target animal are applied. We know the biologists and ecologists undertaking this work have not only an intimate understanding of the specific problems occurring at Southwest Farallon Island and the scientific expertise to have objectively assessed all potential solutions, but they also bring a tremendous love and care for these islands that many have made their life's work. We trust them to make the best possible decisions for this beloved and delicate ecosystem. If it should become necessary, we stand ready to provide treatment for any Western Gulls or other birds that may be inadvertently affected.

Respectfully submitted,

International Bird Rescue