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Mr. Gerry McChesney
Refuge Manager
U.S. Fish and Wildlife Service
San Francisco Bay National Wildlife Refuge Complex
1 Marshlands Road
Fremont, CA 94555

Re: FWS-R8-NWRS-2013-0036 - Farallon Islands Mouse Eradication Project

OPPOSE

Dear Mr. McChesney:

The Marin County Board of Supervisors writes to express our opposition to a proposed project on the federal docket –The South Farallon Islands Invasive Mouse Eradication Project, FWS-R8-NWRS-2013-0036.

A Revised Draft Environmental Impact Statement (RDEIS) for this project, released in fall of 2013, calls for the use of helicopters to aerially disperse approximately 1.3 metric tons of the rodenticide Brodifacoum over the South Farallon Islands. This anti-coagulant rodenticide kills mice by causing internal bleeding but can also kill any animal that consumes the poison accidentally or eats a poisoned rodent. This allows the poison to work its way up through the food chain with dire unintended consequences which we believe have not been considered in the RDEIS.

In a recent agreement with the Environmental Protection Agency (EPA), the manufacturer of Brodifacoum has agreed to halt manufacture by December 31, 2014. The EPA has banned this product from the consumer market. Legislation banning the use of second-generation anti-coagulants, such as Brodifacoum, in environmentally sensitive areas was signed into law by Governor Jerry Brown on September 19, 2014 (AB2657). It has been banned from use on all County of Marin properties, including all buildings, parks and open space, for over five years.

The methodology proposed in the RDEIS to scatter high volumes of loose rat poison pellets (up to 24 lbs. per acre, according to the pesticide label) has drawn opposition and criticism from the EPA, the National Resources Defense Council, American Bird Conservancy, the Center for Biological Diversity, Defenders of Wildlife, National Sierra Club, The Ocean Foundation, Marin Humane Society, the City & County of San Francisco, and additional environmental groups.

The Farallon Islands are the “Galapagos Islands of California”, sited 28 miles off the Golden Gate in the Farallon National Marine Sanctuary. These islands have ecological diversity that extend from the rocky cliffs deep into the ocean that surrounds them. Aerial dispersal of any rodenticide, whether Brodifacoum or some

other product, poses inherent risks to the entire ecosystem. This eradication approach has been an unsuccessful tool in similar situations and sites. The risk and potential negative impact to Marin County and the entire San Francisco Bay Area cannot be underestimated. These risks and impacts include:

- Contamination of the food web around the Farallon Islands.
- Disruption of nesting birds, leading to nesting failure.
- Adverse impacts to fish and marine mammals due to the toxicity of the rodenticide and its proposed use near water.
- The potential for dead gulls and other birds, as well as fish and other marine life washing up on Marin County beaches and shoreline towns in southern Marin.

These are significant environmental issues that will affect the coastal and bay shorelines and residents of Marin. The County of Marin is very proud to have in place an award-winning IPM (Integrated Pest Management) Program that is one of the most progressive and effective in the country. Over the last ten years, Marin County has reduced pesticide usage by 80% on all county land, parks and open space. When our revised IPM Policy & Ordinance (No. 3521) was passed in 2009, the County of Marin discontinued the use of all rodenticides and put in place a poison-free rodent management plan using the science-based principals of Integrated Pest Management (IPM) - and it has worked. For the last five years, on all county land, parks and open space, rodents have been controlled without toxic rodenticides that have lethal impacts on wildlife, children and pets. Our groundbreaking work led Marin County to be recognized as "Innovators in IPM" by the California Department of Pesticide Regulation in 2012.

We are shocked and deeply concerned that USFWS is considering such an extreme and questionable project just off our shoreline. Moreover, as noted in the EPA's comment letter, the organization that submitted the Environmental Impact Study (EIS), Island Conservation, would also likely be selected to implement the proposed eradication program. This conflict of interest has not been addressed and raises additional questions about the measures being proposed, as well as the process itself.

We urge U.S. Fish and Wildlife not to proceed with a project that uses Brodifacoum or similar rodenticides, to reconsider any broad-dispersal techniques that will have unintended consequences for non-target species, and to revisit the environmental review process for the proposed eradication effort in the Farallons.

Sincerely,

Kathrin Sears
President, Marin County Board of Supervisors