



October 19, 2023

Lauren Dennhardt, PhD
Acting Director of Conservation
Catalina Island Conservancy
Phone: 310-510-1299 x229
P.O. Box 2739, Avalon, CA 90704

Re: Catalina Island Restoration Project

Dear Dr. Dennhardt,

On behalf of the Center for Biological Diversity, I write to express our organization's strong support for the Catalina Island Restoration Project. Given the unique endemic species and ecosystems of Catalina Island - and the growing threats they face from climate change, drought, fire, and invasive species - the restoration project is one of the most important biodiversity protection efforts underway in California.

While climate change - and the consequent intensifying drought and more frequent and intense fires affecting the island- requires global action to address, the actual impacts of climate change on the species and ecosystems of Catalina can be significantly lessened or mitigated with on-the-ground actions that increase the resiliency of native species. In this context, addressing invasive species on the island is critically important.

Invasive species have long been recognized as one of the greatest drivers of extinction, particularly on islands. Last month, the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) released its *Assessment Report on Invasive Alien Species and their Control*, highlighting the significant role invasive species play in the extinction crisis. The report found that invasive species have been a major factor in 60% of recorded extinctions globally, specifically noting that "invasive species are most damaging on islands."¹

The Channel Islands generally, and Catalina specifically, are home to dozens of rare and endangered species, with Catalina alone hosting 60 species that occur nowhere else on the planet. The greatest past and ongoing threats to these species have come from introduced, non-native plants and animals. But these threats can be successfully addressed: over the past several decades, islands where introduced goats, pigs, deer and other invasive species have been removed have shown remarkable recovery.

On Santa Cruz Island, for example, non-native feral pigs were completely eliminated from the island in 2006, and as a result, the native fox population rebounded, from fewer than 100 foxes in 2004 to now more than 1,200 in the wild. The pig removal also allowed the Channel Islands bedstraw and Santa Cruz Island dudleya to recover from the brink of extinction, so much so that the U.S. Fish and Wildlife

¹ <https://www.ipbes.net/ias>

Service (USFWS) recently proposed them for delisting under the Endangered Species Act (ESA).² To protect Santa Rosa Island's endemic flora and fauna, the National Park Service in the 1990's removed all non-native herbivores, including pigs, cattle, elk, and deer. Now that removal is complete, recent surveys document nearly twice as many rare and endemic plant species in study plots as there were in the 1990s.³ Importantly, in delisting the island fox on San Miguel, Santa Rosa and Santa Cruz islands, USFWS cited the removal on non-native ungulates as a key element in their recovery.⁴ Notably, on Catalina Island, where non-native ungulates remain, USFWS determined that the fox remains threatened and still warrants the protections of the ESA.

On Catalina, the non-native deer, introduced to the island almost a century ago for the purpose of hunting, are destroying the ecosystem and pushing several endemic plants to the very edge of extinction. Many of these plants evolved without defense mechanisms to protect against deer herbivory. With no natural predators, the deer population repeatedly grows and then contracts, as animals starve or die of thirst during drought years. Consequently, the deer overgraze the island, and in the process have destroyed the natural habitats that support native wildlife and serve other crucial ecological functions, such as erosion control, groundwater recharge, and wildfire resilience. The impacts of deer on the island have been exacerbated by the severe drought of recent decades, impacts that will only grow in the face of climate change. True recovery of the species and ecosystems of Catalina is impossible so long as the deer herd remains on the island.

While all the components of the Catalina Island Restoration Project are important, the single most impactful thing that can be done to protect the unique and irreplaceable plants of Catalina Island is to remove the introduced, non-native deer from the island. We look forward to the recovery and increased resilience of the native plants, animals, and ecosystems on the island as the program is implemented.

Sincerely,



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² 50 Fed. Reg. 7322 (12/01/2022)

³ <https://www.usgs.gov/news/featured-story/livestock-gone-islands-decimated-native-flora-makes-a-comeback>

⁴ 81 Fed. Reg. 53315 (8/12/2016)