



October 30, 2023

**Re: Support for the Catalina Island Restoration Project**

To Whom It May Concern,

I am writing on behalf of the California Native Plant Society (CNPS) in support of current efforts to improve the conservation and management of native biodiversity on Catalina Island via the Catalina Island Restoration Project. CNPS is a non-profit environmental organization with more than 12,500 members in 36 local chapters. Our mission is to protect California's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy.

Catalina Island is home to more than 60 species of plants and animals that are found nowhere else on Earth. According to the CNPS Rare Plant Inventory, the Island is home to 72 rare plant taxa, eight of which are Catalina Island endemics, and five of which are listed as threatened or endangered under the California and/or Federal Endangered Species Acts<sup>1</sup>. Furthermore, 34 of these taxa are endemic to the Channel Islands. On the extreme side of rarity, Catalina is home to one of the world's rarest plant species, Catalina Island mountain mahogany (*Cercocarpus traskiae*), which is now known from only seven individuals in the wild. The remarkable diversity on Catalina Island, and the fact that so many of its species are so rare and of extremely limited distribution, makes their conservation vital.

Since European colonization, the flora and fauna of the Catalina Island continue to be impacted by a number of threats, including climate change, the spread of invasive species, and impacts from feral herbivores. Animals introduced to the island include pigs, goats, sheep, bison, and deer. Each of these species has caused negative impacts to the flora of the island. While feral pigs, sheep, and goats have been eliminated from the island, and bison are managed to minimize ecosystem impacts, the impacts from introduced mule deer continue to be severe and wide-ranging. Over the past decades, the Catalina Island Conservancy has implemented measures including increased hunting permits for deer to reduce population levels and fencing of rare plants to limit harm caused by herbivory. Despite these actions, the population of deer on the island has not been reduced significantly, and the impacts to sensitive resources continue to increase.

For decades, the Catalina Island Conservancy and researchers have documented impacts caused by introduced mule deer. Deer over-browsing is decreasing the density of vegetation, with significant impacts to both rare and common plant species. This is resulting in the death of individual plants, erosion, and the spread of non-native, invasive plant species. The continued presence of deer on the Island presents grave implications for a number of critically imperiled

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<sup>1</sup> <https://rareplants.cnps.org/>

rare plant species. We are specifically concerned that populations of some rare species will be extirpated, and species could go extinct without the complete removal of deer on the island.

The management of introduced animals, as currently proposed by the Catalina Island Conservancy, is not a novel concept on island ecosystems worldwide. Scientists have documented the recovery of species and habitats that has resulted after non-native animals are removed. For example, on nearby Santa Rosa Island, the National Park Service undertook a decades-long effort to remove non-native herbivores including pig, deer, elk, and cattle<sup>2</sup>. Remarkably, the recovery of habitats following this action has been quite rapid with nearly all rare plant species increasing in abundance following feral herbivore removal. Most importantly, follow-up surveys have documented nearly twice as many rare and endemic species compared with surveys in the 1990s, prior to removal. On San Clemente Island, the eradication of non-native herbivores in the 1990s led to the recovery and delisting of four taxa listed under the Federal Endangered Species Act (ESA). Of additional significance is that these four taxa were some of the very first plants to be listed under Federal ESA. These examples from Santa Rosa and San Clemente Islands give us reason to believe that positive change will occur on Catalina Island following the removal of introduced deer.

For these reasons, CNPS supports the Catalina Island Restoration Project. The most important aspect of the plan from the perspective of habitat management and the recovery of rare and endemic plant species is the removal of introduced deer. The global biodiversity crisis and California's perilous ranking for national plant extinction<sup>3</sup>, necessitate these actions to protect Catalina Island's rare plant species and their recovery.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Jensen', with a long, sweeping horizontal line extending to the right.

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<sup>2</sup> <https://www.usgs.gov/news/featured-story/livestock-gone-islands-decimated-native-flora-makes-a-comeback>

<sup>3</sup> <https://www.natureserve.org/bif>