



January 28, 2025

Charlton Bonham
Director, California Department of Fish and Wildlife
715 P Street
Sacramento, CA 95814

Re: Support the Permit for the Catalina Island Restoration Project

Dear Director Bonham,

On behalf of the National Parks Conservation Association (NPCA), I am writing to express our organization's support for the Catalina Island Conservancy's efforts to secure the requisite state permit to ensure a healthy, climate resilient, and fire-resistant Catalina Island where humans and nature can thrive for years to come. Invasive species have had adverse impacts on the island for decades, and it is imperative to act now to halt and reverse the damage. The presence of mule deer on the Island disrupts the Island's ecosystem balance and sustainability, increasing the risk of wildfires that threaten Island residents, biodiversity, and infrastructure. Catalina is a special place for the many species who live on and visit the Island, with over 60 endemic plant and animal species, 3,500 year-round residents, and a terrain that offers ample recreational opportunities for over a million annual visitors. The Catalina Island Restoration Project is critical to protecting the biodiversity that will secure climate resilience for an important resource for communities across Southern California to learn about and experience unique landscapes and species.

NPCA is very familiar with island ecosystem restoration activities in California, and perspectives of stakeholders. At the nearby Channel Islands National Park, the NPCA worked to protect Santa Rosa Island from non-native elk and deer that were harming endangered species and their habitat. The restoration required the National Park Service to remove the non-native elk and deer using aerial culling, the same scientifically supported, most humane method that is being proposed at Catalina Island.

During the past 30 years, the removal of non-native species from Channel Islands National Park has helped ensure the survival and recovery of imperiled and native species. At its most fundamental level, human intervention for the benefit of natural ecosystems raises issues of not only science and ecology, but philosophy and ethics. The issues are seldom, if ever, black and white. As Dr. Adrian M. Wenner, Professor Emeritus in the Department of Ecology, Evolution, and Marine Biology at UCSB wrote in response to opposition to feral pig eradication efforts on Santa Cruz Island:

“As a biologist, I have had extensive experience on the island and can report firsthand about the pig situation there. Feral pigs on the island number in the thousands. In good years, they reproduce to their full ability and soon exceed their food source. As they run out of easily obtainable food, such as acorns, they desperately plow up the ground in search of bulbs, roots and tubers, leaving the soil open to being washed away in future rains; and thereby exterminating native plants. They then eat non-nourishing grass as they starve. During the 1988 and 1989 droughts, for example,

perhaps nine-tenths of the pigs died of starvation. But pigs don't starve immediately; as the weaker ones succumb, they get attacked and eaten by stronger pigs. At those times we could hear the squeals of pigs in such fights. By the end of 1989, nearly every pig I encountered was nothing more than a bag of bones that could hardly move. When they noticed us, they most often fell over as they tried to move. Even in good years feral pigs suffer. Last week we grabbed a piglet for examination. Dozens of blacklegged ticks -- vectors of Lyme disease, fleas and lice lived on its soft underside. Island feral pigs, when they overpopulate, cannot migrate to greener pastures; they starve. Is it more humane to let these feral pigs continue their overpopulation, starvation and cannibalism or eliminate a few thousand from the island now, before untold thousands die in the future during such cycles?"

NPCA supports the Conservancy's permit application for the eradication of the invasive mule deer as part of the Catalina Island Restoration Project because Catalina Island is a gateway to science, education, and nature for Catalina Island residents and visitors. We urge the California Department of Fish and Wildlife to support the permit. As the only accessible island in Southern California, Catalina is an important entry point for millions of people in Southern California to connect with one of the richest island ecosystems in the world through hiking, camping, snorkeling, and much more. These visitors include thousands of youth per year who participate in overnight camps centered on outdoor science and adventures, creating a foundation for the next generation of environmental leaders and stewards. Catalina Island's unique wildlife and recreation opportunities generate millions in visitor-driven revenue, supporting the people living and working on the island, many of whom have been there for generations.

Catalina Island's ecosystems as we know them are at risk. Without protective measures, many native and endemic species face extinction, and the Island may no longer be able to withstand climate change or support diverse ecosystems for years to come. The effects of disappearing species are already evident, as native chaparral habitats disappear and transition into invasive annual grasslands. Native flora on the island absorb and retain water and are drought-resistant, acting as natural protection against wildfire and providing important habitat for native animal species. When these native plants are threatened by non-native wildlife, namely the mule deer, the Island is vulnerable to succumbing to devastating climate threats such as wildfire and drought. A catastrophic wildfire is inevitable, such as the 2007 Island Fire, in which 10% of the Island burned and 700 residents and visitors were forced to evacuate. Droughts are similarly unavoidable and disastrous, such as the 2011-2017 drought on the Island, which caused wildlife to die of dehydration and starvation in large numbers and residents to rely on highly polluting desalination plants. Support for the Catalina Island Restoration Project will safeguard the Island from similar catastrophic impacts, lessening the damage to the Island and bolstering the Island's ability to recover.

Invasive species are one of the greatest threats to biodiversity worldwide. Removal of invasive species is imperative to preserving biodiversity and to reaching the state's goal of conserving 30% of lands and coastal waters by 2030. Eradicating the mule deer is a vital and foundational component of the Restoration Project, and will enable the ecosystem to recover from overgrazing and trampling. Studies have shown that aerial hunting, as proposed in the permit, is the most humane and effective method of deer removal, minimizing stress levels of deer significantly more than translocation and birth control. Despite Catalina Island having the longest recreational hunting season in the state, the mule deer population continues to grow unchecked, indicating that recreational hunting alone is not a viable method of controlling mule deer population.

The Catalina Island Conservancy is an exemplary steward of Island resources, successfully balancing conservation, education, and recreation. Their Catalina Island Restoration Project is a science-based, comprehensive plan to protect the Island's biodiversity, reduce erosion, prevent wildfires, and create a sustainable environment where nature and humans will thrive for years to come. The implementation of the Restoration Project is urgent given the heightened climate threats to the species, people, and ecosystems of the land. Without the Restoration Project, communities across Southern California could lose access to one

of the most unique outdoor classrooms in the region, thousands of residents could lose their homes, and the world could lose species found nowhere else on earth.

We thank you for your time and greatly look forward to working together to ensure that Catalina Island will be preserved for generations to come.

Sincerely,

A handwritten signature in cursive script that reads "Neal Desai".

Neal Desai
Senior Director, Pacific Region
National Parks Conservation Association