

## **Appendix C**

### **Comment Letters Received by the Commission**

**National Park Service  
(October 2, 2002)**

**California Wetfish Producers Association  
(October 23, 2002)**



# United States Department of the Interior

## NATIONAL PARK SERVICE

Channel Islands National Park

1901 Spinnaker Drive

Ventura, California 93001-4354

IN REPLY REFER TO:

N16-CHIS

October 2, 2002

Mr. Robert Treanor  
Executive Director  
California Fish & Game Commission  
1416 9<sup>th</sup> Street, Room 1320  
Sacramento, California 95814

Dear Mr. Treanor:

We have reviewed the Department's response to a petition submitted to you by the Pacific Seabird Group to list Xantus' murrelets as a threatened species under California law.

We found the Department's analysis to be clear, concise, and accurate. We were pleased to see some of our monitoring data used in the analysis.

Based on the population trends, historical habitat, and documented threats, we support listing this species under the State's Endangered Species Act as soon as possible.

Thank you for the opportunity to review this information.

Sincerely,

Tim J. Setnicka  
Superintendent

RECEIVED  
CALIFORNIA  
FISH AND GAME  
COMMISSION  
2002 OCT - 8 PM 1:52

# CALIFORNIA WETFISH PRODUCERS ASSOCIATION

2194 SIGNAL PLACE  
SAN PEDRO, CA 90731

OCTOBER 23, 2002

ORLANDO AMOROSO  
S.C.A. COMMERCIAL  
FISHING ASSOC.

VANESSA DELUCA  
STATE FISH  
COMPANY

JOHN CAR  
TRI-MARINE FISH CO.

PETE GUGLIELMO  
SOUTHERN CA  
SEAFOOD

FRANK TOMICH  
TOMICH BROS.  
SEAFOOD

PETER DIVONA  
CRS / STANDARD  
SEAFOOD

JOE BURCH  
OCEAN GEM  
SEAFOOD

.....

REPRESENTING  
35 PURSE SEINE  
VESSEL OWNERS  
WHO EMPLOY  
288 FISHERMEN

AND  
6 COMPANIES WITH  
1206 EMPLOYEES

MR. MICHAEL FLORES, PRESIDENT

AND MEMBERS OF THE CALIFORNIA FISH AND GAME COMMISSION

RE: THE IMPORTANCE OF CA'S WETFISH INDUSTRY TO CALIFORNIA

THANK YOU FOR THIS OPPORTUNITY TO PRESENT OUR VIEWS AND CONCERNS.

THE CALIFORNIA WETFISH PRODUCERS ASSOCIATION REPRESENTS THE MAJORITY OF PROCESSORS AND FISHERMEN WHO PRODUCE "WETFISH" - INCLUDING SARDINES, MACKEREL, COASTAL TUNAS AND SQUID - IN SOUTHERN CALIFORNIA.

SINCE BEFORE THE TURN OF THE 20<sup>TH</sup> CENTURY, WETFISH SPECIES HAVE REPRESENTED THE LION'S SHARE OF THE COMMERCIAL CATCH IN THE GOLDEN STATE. THESE SPECIES STILL FORM THE BACKBONE OF CALIFORNIA'S FISHING INDUSTRY:

IN THE YEAR 2000, FOR EXAMPLE, THE WETFISH INDUSTRY PRODUCED ABOUT 455.5 MILLION POUNDS OF FISH -- 83.6 PERCENT OF TOTAL CA COMMERCIAL FISHERY LANDINGS, WITH AN EX-VESSEL VALUE OF \$38.9 MILLION, OR NEARLY 30% OF THE TOTAL X-V VALUE OF ALL FISHERIES IN CALIFORNIA.

THE EX-PROCESSOR VALUE OF THIS INDUSTRY COMPLEX TO THE STATE IS ESTIMATED AS HIGH AS \$90.2 MILLION.

THE WETFISH INDUSTRY IS AN IMPORTANT SOURCE OF REVENUE TO THE STATE:

FISH LANDING TAXES CONTRIBUTED BY WETFISH SPECIES IN THE THREE YEAR PERIOD 1998-2000 TOTAL MORE THAN \$3 MILLION. SARDINES, TAXED AT THE UNUSUALLY HIGH RATE OF \$13 PER TON, CONTRIBUTED \$2.1 MILLION OF THAT TOTAL.

SOUTHERN CA PORTS (INCLUDING SANTA BARBARA, LOS ANGELES AND SAN DIEGO AREAS) PRODUCE THE VAST MAJORITY OF TOTAL WETFISH LANDINGS. IN 2000 SOUTHERN CA PORTS LANDED:

- ° 94 PERCENT OF THE STATEWIDE SQUID HARVEST (MORE THAN 244.2 MILLION POUNDS OF THE TOTAL HARVEST OF 259.669 MILLION POUNDS).
- ° 80 PERCENT OF THE PACIFIC SARDINES HARVESTED STATEWIDE (MORE THAN 93 MILLION POUNDS OF THE 116.136 MILLION POUNDS HARVESTED)
- ° 99.8 PERCENT OF THE PACIFIC MACKEREL CATCH (46.715 MILLION POUNDS OF THE TOTAL 46.786 MILLION POUNDS HARVESTED).

A SUBSTANTIAL PART OF THIS CATCH COMES FROM WATERS SURROUNDING THE CHANNEL ISLANDS.

CALIFORNIA'S WETFISH FISHERIES COMPRISE THE HEART OF CALIFORNIA'S FISHING INDUSTRY AS A WHOLE. THE ENTERPRISE OF THIS INDUSTRY COMPLEX HELPED TO BUILD THE PORTS OF MONTEREY AND SAN PEDRO, AS WELL AS SAN DIEGO AND SAN FRANCISCO.

TODAY, HOWEVER, THE WETFISH INDUSTRY FACES UNPARALLELED THREATS TO ITS CONTINUED VIABILITY -- SERIOUS CHALLENGES TO ITS FUTURE EXISTENCE:

- THIS COMMISSION IS CONSIDERING CLOSING A SIGNIFICANT PORTION OF THE CHANNEL ISLANDS TO FISHING, WHICH WILL HAVE A STRONG NEGATIVE IMPACT ON THE HARVEST OF WETFISH, ESPECIALLY SQUID, WITH VIRTUALLY NO MEASURABLE BIOLOGICAL BENEFIT TO OFFSET THE LOSS OF ACCESS.

RICHARD PARRISH, NMFS, STATED IN CALCOFI REPORTS V.40 1999, "MARINE RESERVES FOR FISHERIES MANAGEMENT: WHY NOT" -- RESERVES WILL DO LITTLE TOWARD ACHIEVING OPTIMUM YIELD FOR EPIPELAGIC AND MIGRATORY SPECIES, INCLUDING MACKEREL, SARDINES AND SQUID.

SCIENTIFIC THEORY ADVOCATING ESTABLISHMENT OF "NO-TAKE ZONES" IN 30-50 PERCENT OF THE CINMS, ASSUMED THAT FISHERY MANAGEMENT WAS NONEXISTENT OR HAD FAILED. THIS ASSUMPTION IS WRONG, PARTICULARLY FOR WETFISH. SARDINES AND MACKEREL ARE MANAGED UNDER A LIMITED-ENTRY FEDERAL FMP WITH CONSERVATIVE HARVEST GUIDELINES. THE MARKET SQUID RESOURCE IS ACKNOWLEDGED TO BE ROBUST, AND WITH A VERY SHORT LIFE-SPAN, SQUID ABUNDANCE IS GOVERNED BY NATURAL CYCLES RATHER THAN FISHING. NOTWITHSTANDING THIS, THE SQUID FISHERY ALSO IS REGULATED -- WITH WEEKEND CLOSURES, SHIELDS ON ATTRACTING LIGHTS, AND A LIMITED ENTRY PROGRAM NOW UNDER DEVELOPMENT.

ALTHOUGH THE "30-50" SET-ASIDE THEORY HAS NOT UNDERGONE PEER REVIEW BY FISHERIES SCIENTISTS, IT FORMED THE BASIS FOR THE DEPARTMENT'S PREFERRED ALTERNATIVE FOR THE CINMS, WHICH WAS CRAFTED AS A "COMPROMISE".

CONSERVATION ZONES PROPOSED IN THE PREFERRED ALTERNATIVE PROVIDE FOR THE RECREATIONAL HARVEST OF PELAGIC FINFISH, BUT THEY EXCLUDE COMMERCIAL HARVEST OF CPS SPECIES. ANY CONSERVATION ZONES ESTABLISHED SHOULD ALSO ALLOW COMMERCIAL FISHING FOR ALL COASTAL PELAGIC SPECIES, INCLUDING SQUID.

- A BURGEONING SARDINE INDUSTRY IN THE PACIFIC NORTHWEST IS CHALLENGING THE ESTABLISHED POSITION LONG HELD BY CALIFORNIA'S TRADITIONAL SARDINE FISHERY. THE RAPID EXPANSION OF THE PNW SARDINE FISHERY IN THE ABSENCE OF RESEARCH COULD PRECIPITATE ANOTHER DECLINE OF THE SARDINE RESOURCE. ALTHOUGH THIS IS NOW A FEDERAL ISSUE, IT NEGATIVELY IMPACTS CALIFORNIA'S WETFISH INDUSTRY NEVERTHELESS.
- IN ADDITION TO NO-TAKE ZONES PROPOSED FOR THE CHANNEL ISLANDS, NOW THE FISH AND GAME COMMISSION IS CONSIDERING FURTHER RESTRICTING THE SQUID HARVEST TO PROTECT THE XANTUS'S MURRELET, BASED ON THE HYPOTHESES OF BIRD BIOLOGISTS AND IN THE ABSENCE OF QUANTIFIED EVIDENCE THAT SQUID FISHING IS ACTUALLY RESPONSIBLE.

IN MAKING YOUR FINAL DECISION ON THIS ISSUE, PLEASE CONSIDER THESE FACTS --

THE DECLINE OF MURRELETS BEGAN IN THE MID 1970S, LONG BEFORE RECENT SQUID FISHING ACTIVITY AT THE ISLANDS;

OTHER FACTORS HAVE BEEN IDENTIFIED AS SIGNIFICANT CONTRIBUTORS RESPONSIBLE FOR THE DECLINE, SUCH AS PREDATION BY RATS;

THE SQUID INDUSTRY HAS COOPERATED WITH RESEARCH TO MINIMIZE THE IMPACT OF ITS ACTIVITIES. FOR EXAMPLE, THE USE OF LIGHT SHIELDS HAS BEEN SHOWN TO EFFECTIVELY REDUCE LIGHT OUTPUT TO NO MORE THAN THAT OF A DECK LIGHT ON A RECREATIONAL VESSEL, MEASURED AT A 1/4 MILE DISTANCE.

WETFISH ARE AN HISTORIC AND CULTURAL RESOURCE, AS WELL AS ECONOMICALLY VALUABLE BOTH TO THE FISHING INDUSTRY AND THE STATE OF CALIFORNIA. SINCE BEFORE THE TURN OF THE 20<sup>TH</sup> CENTURY, THE WETFISH INDUSTRY HAS BEEN THE FOUNDATION OF CALIFORNIA'S

FISHING INDUSTRY. WETFISH STILL REPRESENT MORE THAN 80 PERCENT OF TOTAL CALIFORNIA COMMERCIAL FISHERY LANDINGS.

WE WOULD GREATLY APPRECIATE THE COMMISSION'S CONSIDERATION OF THESE FACTS WHEN MAKING DECISIONS AFFECTING ACCESS TO WETFISH RESOURCES. PLEASE ACKNOWLEDGE THE IMPORTANCE OF CALIFORNIA'S WETFISH INDUSTRY TO THE STATE AND PROTECT IT, TOO, SO THIS TRADITIONAL, COLORFUL PART OF CALIFORNIA WILL SURVIVE AND PROSPER FAR INTO THE FUTURE.

THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

A handwritten signature in cursive script that reads "Diane Pleschner-Steele". The signature is written in black ink and is positioned below the word "SINCERELY,".

DIANE PLESCHNER-STEELE FOR

CALIFORNIA WETFISH PRODUCERS ASSOCIATION

## **Appendix D**

### **The Battle for Santa Barbara!**

**Sumner, L. 1959. Outdoor California  
Vol. 20(1):4-7**

# The Battle for Santa Barbara!

—A case history of what happened when rabbits were introduced to an island having several unique species of plant and bird life—and the desperate fight to save them from extinction . . .

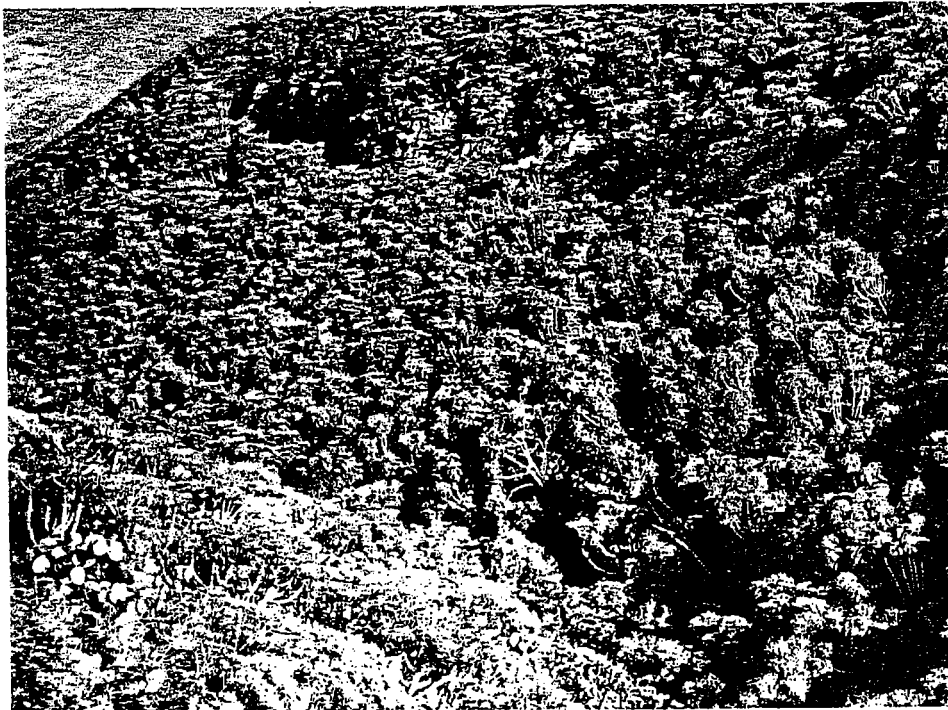
By Lowell Sumner  
Biologist, National Park Service

A war to save certain unique species of plant and bird life from extinction has been raging off and on for the last four years close to the California mainland.

The unpublicized battles on Santa Barbara Island, one of two islands of the Channel Islands National Monument off the Ventura-Los Angeles coast, have been fought by biologists of the National Park Service and the U. S. Fish and Wildlife Service with assistance from the California Department of Fish and Game. These battles



No, this stark scene isn't the result of a forest fire—rabbits are to blame. They've girdled the trees and shrubs and eaten almost everything eatable on the island. The damage speaks for itself. (National Park Service photo.)



Santa Barbara Island's lush vegetation containing many rare species of plant life, as it appeared before advent of the rabbit. If sufficient rainfall occurs and if the number of rabbits remaining after concerted cleanup campaigns can be kept to a minimum, the island's native vegetation and birds eventually may be restored. (National Park Service photo.)

are a desperate, last-minute attempt to preserve a species of giant sunflower, a species of song sparrow, and other flowers and small animals found nowhere else.

The enemy? Rabbits, introduced to the island by early day farmers and again during World War II. The critters simply took over. The result was disastrous.

#### Isolation Saved Ancient Species

Looking backward a moment, Santa Barbara Island several million years ago was cut off from the mainland. Only because of this isolation was it able to develop and maintain its ancient species of plant and bird life. Time figuratively stood still—that is, until the arrival of the white man about 100 years ago (prehistoric man and Indians lived there, but they didn't materially disturb natural conditions).

Those early fishermen and ranchers brought over goats, sheep, nonnative weed seeds and the rabbits, all of which were to have important effects on the island's plant and bird life.



Setting out on one of their early rabbit cleanup drives, armed with guns which proved to be ineffective in getting the job done, are, left to right: Yernal A. Smith, Park Ranger, Cabrillo and Channel Islands National Monument; Grant Birmingham, U. S. Fish and Wildlife Service; Paul Schumacher, supervisory archaeologist, National Park Service; Bennett T. Gale, Regional Chief of Interpretation, National Park Service, and Eric Peacock, U. S. Fish and Wildlife Service. (National Park Service photo)

#### Grazing, Weeds Upset Balance

The goats and sheep over-grazed the island; farming disturbed the ground cover and introduced competing weed plants which tended to crowd out the native species. In those early years, probably because rainfall was more abundant then, the rabbits were only a minor threat to the giant sunflower, although they did nibble at the young plants and girdle some of the older plants so that they died. In the nick of time the sheep finally were removed in 1937.

The island passed from jurisdiction of the Federal Lighthouse Service to the National Park Service the following year. Now it is a national monument.

During the 12 years after 1937 the native plants made a spectacular comeback under complete protection. This largely was made possible by continuing abundant rainfall which enabled the plants to thrive and recover despite the man-caused competition. It was the golden age of recovery.

But during World War II, the New Zealand Red strain of rabbits was introduced and freed as a possible emergency source of food, leading to a drastic change in 1950.

#### Dry Cycle Begins

Coupled with the beginning of a period of less than normal rainfall, the rabbit population "exploded." Between 1950 and 1953, the jungle of giant sunflower, morning glory and other native plants—which sheltered the unique species of song sparrow—became barren wasteland. Rabbits

killed the "forest" understory, leaving only bare ground beneath the dying sunflower jungle on which not even a mouse could find a place to hide.

A former hayfield was reduced to stubble. The place looked as though a forest fire had burned it.

At that point the National Park Service asked the help of the Fish and Wildlife Service and the California Department of Fish and Game in undertaking a rabbit control program. This began in October, 1954, with DFG providing transportation to and from



Note how the rabbit has completely girdled the trunk of the giant sunflower, or *Coreopsis*, one of the rare species of plant life for which Santa Barbara Island is noted.

the island whenever possible but with the federal men carrying out the control work.

#### Shooting Was Ineffective

It was a discouraging task. Teams of men combed the island, shooting as many rabbits as they could find. It took four men six days to shoot 400 rabbits. Before the project began, mainlanders had shot about 100. That made 500 rabbits removed—but the control crew estimated at least 200 more remained and could not be completely tracked down because of the steep, inaccessible terrain bordering the ocean, which gave refuge to the animals.

Shooting had removed only 2.6 rabbits per man-hour of hunting, far too slow to accomplish the job.

The experimental use of poison, under safeguards to prevent harm to other wildlife, removed 12 more rabbits in that first intensive campaign before weather conditions and other factors forced a halt and the biologists had to leave the island.

#### Poison More Successful

Back they came the next year to renew the fight to exterminate the rabbits. Poison was used on a large scale and with that, augmented by some shooting, some 2,500 of the pests were killed. This figure indicated that probably many more than the estimated 200 had survived the previous year's roundup. Again, despite the men's best efforts, they estimated at least 150 of the animals still remained at the end of that year's campaign to produce more litters during the off-season.

When the rabbit control crew returned to the island in 1956, they found the animals for the first time in poor condition. The continuing dry cycle had resulted in less and less plant growth and poorer nutrition. The rabbits were literally eating themselves out of house and home.

But, despite having killed all but about 150 of the rabbits the previous year, some 600 more were killed during the 1956 control effort.

It was obvious that not much headway was being made, for enough survivors remained at the end of each cleanup effort to make it necessary to do the job all over again.

In the fall of 1957, plans were made for the work party to stay longer this time to mop up. Meanwhile, ice plant had spread so far and so thickly in

(Continued on page 6)





No wonder they had a hard time controlling the pesky rabbits! In cliffside burrows some of them managed to stay out of reach from year to year. Grant Birmingham of the U. S. Fish and Wildlife Service maintains a precarious foothold while he pumps cyanide gas into a burrow. (National Park Service photo)

(Continued from page 5)

place of the ravaged natural vegetation that the rabbits couldn't get through it.

The combination of unusually dry conditions, virtual elimination of the plants on which the animals long had fed, the relentless control program and the carpet of ice plant at last seemed to be accomplishing the job of removing the pesky rabbits. After poisoning and shooting 500 of them that fall, the scientists saw only two live rabbits—although by this time the likelihood that others remained in inaccessible places was taken for granted.

#### Rainfall Aids Recovery

Then, last spring, after the wettest winter since 1937, came signs of encouragement, accompanied by another setback. There was a slight revival of the giant sunflower, and the morning glory's recovery was marked. Other plants and wild flowers also were making a comeback.

By this time the ice plant had spread over one-half of the island's surface to a depth of 12 to 18 inches—difficult for humans to wade through and impenetrable for the rabbits. This forced most of the rabbits into three major

cleared areas, making it easier for the cleanup group to attack them.

On the other hand, the rabbits were once more in good condition, thanks to having more to eat, and apparently they were making the most of it by producing more litters than they could during the dry years.

#### Climate Plays Biggest Role

Meantime the National Park Service men had come to three conclusions: (1) climatic conditions, primarily rainfall, had more effect than direct controls on determining the ups and downs of rabbit population and vegetation growth, (2) only during wet cycles can the vegetation on Santa Barbara Island hold its own in the battle with the rabbits, and (3) absolute extermination of the rabbits was necessary during the fall of 1958 if the native bird life and vegetation ever was to be restored to its original condition.

In the 1958 fall rabbit control campaign 10 men from the same co-operating agencies spent 41 man-days in an all-out effort to end the rabbit menace once and for all. The results of the previous year's stepped up campaign

were reflected in the fact that fewer rabbits were seen at the commencement of control operations than in any previous year.

#### Variety of Methods Used

Eighteen man-days of shooting produced only 62 rabbits. Two hundred sixty rabbits were accounted for by poisoning operations which were repeated for all areas of infestation from four to six times. One rabbit was caught in steel traps, and one was taken alive. Poisoned carrots were tossed in large quantities over cliffs to areas that in previous years had been inaccessible to control by poisoned grain.

At the close of the operation no live rabbits could be found. However, this in itself is not entirely conclusive. It was the consensus of the field men that from 6 to 25 rabbits might still remain alive. A checkup next spring should reveal whether this was so. In any event, the reduction from an estimated peak population of 6,000 (in 1952-53) to two dozen animals or less in 1958 has been accomplished.

If there actually are any surviving rabbits, another winter favorable for vegetation like the last might permit the vegetation to stay ahead of the rabbits. At the worst, the vegetation definitely has been rescued for the time being.

#### Which Plants Will Win Victory

A new biological imponderable does loom, however: the nonnative ice plant which was released by the rabbits from competition with the native plants now covers more than 85 percent of the island. Whether the native plants can win back control over the aggressive ice plant will constitute the next chapter in the unfolding ecological history of Santa Barbara Island.

From the long battle certain principles known to every biologist and trained game manager emerge clearly:

1. Habitat is the key to wildlife abundance and when habitat is destroyed, there seldom is much that can be done to restore the situation without an expensive, time-consuming all-out effort. Even this sometimes is too little and too late.

#### Lack of Natural Controls Is Harmful

2. Many species, when unchecked by natural predators or other controls, can rather quickly cause almost irreparable damage to their own habitat

(Continued on page 7)

## Weyerhaeuser Firm Teams With Oregon On Salmon Project

A good example of how industry sometimes finds it possible to co-operate for the benefit of fish conservation is related in the November issue of *Northwest Pulp & Paper News*.

It said the Oregon Fish Commission and Weyerhaeuser Timber Company are working together to build an experimental natural "fish farm" on the east fork of the Millicoma River in Coos County. It will be used to supplement and establish fish runs in coastal streams.

Commission Director Albert M. Day said a 10-acre pond, holding 500,000 salmon fingerlings, is intended to lower costs of rearing fish in hatcheries by placing fingerlings in impounded water with a natural food supply. Weyerhaeuser installed culverts and other modifications at a cost of \$5,000 and is giving up an acre of tree-growing land.

"In addition," said Day, "the company has voluntarily spent approximately \$8,000 to modify the new channel bed as a fisheries protection measure."

## Santa Barbara—

(Continued from page 6)

and that of other wildlife sharing the same area.

(The National Park Service faces a parallel situation with respect to the nonnative wild burros of Death Valley National Monument, which in the last 50 years have multiplied and spread through much of the mountainous parts of that region with devastating effects upon native vegetation and upon the native desert bighorn sheep.)

3. No species of wildlife or plant ever should be introduced to an area without prior study to determine the possible effects on life already inhabiting that area. It's obvious that more harm than good often can and does occur when this precaution is not taken.

White pelicans are one of our largest American birds. Their wingspread reaches nine feet.

Most wild elk live to be about 10 years old, but captives have lived to be 25.

## Del Norte Elk Hunters Fined, Given Jail Terms; Firearms Confiscated

Fines totaling more than \$1,000, backed up by 30-day jail sentences, were imposed by Judge W. U. Flachsman of Klamath, Del Norte County, against three violators involved in killing elk or possessing the meat.

Marvin Isaac Wood of Klamath was charged with taking and possession of elk. Two sacks of boned elk meat confiscated by Warden Ralph Schlitzkus were turned over to the Del Norte County Infirmary. Wood was fined \$500 and his jail term was suspended on condition of his strict observance of the Fish and Game Code in the future.

Gale L. Baker of Requa was fined \$300 for taking and possession of elk meat and having a loaded rifle in his car. He was placed on one-year probation and his jail term suspended.

Lawrence L. Taylor, Jr., of Requa, charged with possession of elk meat, was fined \$250 and received the same jail and probation terms.

Schlitzkus also confiscated two rifles and a hunting knife. The offenses occurred January 11th in the Split Rock-Flint Ridge area of Del Norte County.

## Ike Reports Duck Band

President Eisenhower has joined the ranks of sportsmen who properly report "duck bands." He was told by the U. S. Fish and Wildlife Service that the mallard he killed in November at Little Cedar Point near Toledo, Ohio, had been banded 41 days earlier at the Willow Slough State Game Preserve in Indiana.

More than half of all the fresh water in the world lies within Canada.

### CONSERVATION WEEK

The 25th annual California Conservation Week is set for March 7-14. Learn what you or your organization can do to promote the cause of good conservation. Write: California Conservation Council, 912 Santa Barbara Street, Santa Barbara, for list of suggested activities.



The 1958 Pismo clam census in the Pismo Beach area revealed that last year's crop is growing well but this year's clam set again was poor, which has been the case for all but one of the last 10 years. Marine Biologists J. L. Baxter, left, and John E. Fitch sift sand from the census trench to learn how the young clams are faring.