

## Request for Waiver of Time and Page limits under S.O. 3355

To: Office of the Deputy Secretary

Through: Margaret Everson, Principal Deputy Director

From: Paul Souza, Regional Director, Pacific Southwest Region

Date: March XX, 2019

1. Bureau or Office Name: Farallon Islands National Wildlife Refuge
2. Title of Document: South Farallon Islands Invasive House Mouse Eradication Project: Final Environmental Impact Statement
3. Description of Action: The project proposes to eradicate introduced, invasive house mice (*Mus musculus*) from the South Farallon Islands which are located approximately 30 miles offshore from San Francisco, California. Eradicating mice is expected to benefit native seabirds, amphibians, terrestrial invertebrates, and plants and will help restore natural ecosystem processes on the islands. The Preferred Alternative (FEIS Alternative B) proposes two aerial applications of rodent bait Brodifacoum-25D Conservation to the islands.

The project includes a number of mitigation measures to reduce or avoid adverse impacts to native species including operational timing that avoids the breeding season for most native species and an extensive gull hazing operation to minimize impacts to gulls from non-target take.

There are no cooperating agencies; however, the Service consulted extensively with collaborating agencies including the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (USDA/APHIS/WS), U.S. Environmental Protection Agency (EPA), Greater Farallones National Marine Sanctuary, and California Department of Fish and Wildlife prior to choosing the preferred alternative for this project.

4. Time waiver:  150 Page waiver:  (check all that apply)

5. Was a waiver or extension previously granted, and if so, how much time or many pages were previously approved? We have not previously requested a waiver.

6. Description of Reason for Request:

We are requesting an extension of the due date for signing the Record of Decision for this project, until July 23, 2019, in order to complete the Coastal Zone Management Act consistency determination review process.

This request is an outgrowth of recent consultations with the California Coastal Commission (Commission) on the optimal schedule for presenting this project to the Commission at one of their regularly scheduled public hearings. The Commission has advised us that there will likely be significant public interest in this project and that members of the public will want the

opportunity to address the Commissioners at the required public hearing on the Consistency Determination.

The Commission holds monthly meetings in different parts of the state. In order to maintain the current schedule of receiving the Commission's concurrence by our current ROD target date of June 20, 2019, a hearing on the project should be held not later than the Commission's May meeting. The May meeting is in Southern California, a six hour drive from the area where the Farallon Islands and most interested public members are located within the San Francisco Bay Area. (The March meeting has already occurred and the agenda for the April meeting is closed.) The June meeting is even farther away, in San Diego, a 9-hour drive from the Bay Area.

The Commission suggests scheduling the hearing on the Consistency Determination at the July meeting (July 10th - 12th) in San Luis Obispo, which is significantly closer to the Bay Area. This would make it substantially easier for the interested public to attend the Commission hearing and provide public comments. Both the Commission and Service staff believe this will make the process more open and transparent to the public.

7. Need and deadline (if any) for issuance of waiver(s) decision: A decision on this waiver request is needed by March 28, 2019. If the waiver is denied, the current schedule requires us to submit the Consistency Determination to the Commission on or before April 1, 2019, in order to be on the agenda for the June 10-14, 2019 Commission meeting.

8. Positions of affected stakeholders: Members of the public who want the opportunity to comment on the consistency of the project with the Commission's Coastal Plan will support this extension because a closer meeting location will facilitate their participation in the public process.

9. Other relevant considerations: Delaying the ROD until late July would not impact project implementation because the Service does not have funds to implement this project this year.

10. Attachments: Original and new proposed project timeline.

Granted: \_\_\_\_\_ Date: \_\_\_\_\_

Denied: \_\_\_\_\_ Date: \_\_\_\_\_