

Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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Chris Swenson
Project Biologist
U.S. Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

RE: Proposal to Eradicate Small Mammal from Lehua Island, Hawaii

Dear Mr. Swenson:

On behalf of the Pacific Seabird Group (PSG), we offer the following comments on the scoping notice for the eradication of introduced small mammals on Lehua Island, Hawaii. PSG is an international, non-profit organization that was founded in 1972 to promote knowledge, study, and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. Collectively, our knowledge about seabirds and the effects of predation on them is considerable. We have hosted special symposia on this topic and have supported eradication efforts in Alaska, California, Mexico, and Hawaii in the past.

PSG strongly supports the proposed Lehua small-mammal eradication efforts to aid in the conservation of seabirds and their habitat. Rats are notorious for their depredations on bird chicks and eggs as well as adults of the smaller species, whereas rabbits consume the plants that provide structure to the soil. The introduction of rats on Midway during 1943 decreased seabird populations there and caused the extinction of the Laysan rail (Fisher, H. I. and P. H. Baldwin, 1946, War and the Birds of Midway Atoll, Condor 48:1-15). On a more positive note, the successful eradication of rats on Midway in the 1990s has had positive impacts on small nesting seabirds such as Bonin petrels and storm-petrels. The introduction of two species of rabbits on Laysan Island in 1903 led to the eradication of much of the native vegetation and the extinction

of many birds (Harrison, C. S., 1990, *Seabirds of Hawaii: Natural History and Conservation*, Cornell University Press; Rauzon, M. J., 2001, *Isles of Refuge: Wildlife and History of the Northwestern Hawaiian Islands*, University of Hawaii Press). We commend you for focusing on removing rats and other introduced mammals from islands offshore of the Main Hawaiian Islands. Restoring the Lehua Island ecosystem by removing introduced rats and rabbits can be very cost effective and will pay huge dividends for seabirds, endangered plants, and other creatures. For example, small and vulnerable seabird species such as blue-gray noddies, Harcourt's storm-petrels, sooty storm-petrels, and Bulwer's petrels will almost immediately benefit from the eradication of rats on Lehua. The elimination of rabbits there will benefit all species that need vegetation for nesting, shade, or the stabilization of soil for burrows. Hence the restoration of Lehua will likely allow many species to reclaim their former ranges.

USFWS' Regional Marine Bird Policy for two decades has stated that its policy is to "remove all introduced predators from marine bird colonies on all National Wildlife Refuges and encourage their removal from all other colonies" as well as to "utilize all available programs and divisions of the Fish and Wildlife Service" to maintain all marine birds "in their natural diversity and on native habitat throughout their range" on all non-Service lands (November 15, 1985). The proposed rat- and rabbit-removal project furthers that venerated policy.

PSG approves of the use of all of the techniques suggested in the notice, including the use of rodenticides. We recently have supported and encouraged similar rodenticide-based projects on Anacapa Island, California, and in the Aleutian Islands, Alaska. Although PSG recognizes that the elimination of alien predators that devastate natural communities of plants and animals and that drive some species to extinction sometimes is controversial, we have supported USFWS and other agencies in the past when groups that are ignorant about wildlife management attempt to thwart projects such as this, sometimes by force of litigation. PSG will gladly lend its name and expertise to joint press releases concerning this project to help educate anyone who may be initially opposed to this project.

Finally, we believe that the goals of this project must be full eradication. In our considerable experience, we have learned that half-measures are inefficient and simply are a waste of funds. Several members of our organization are world experts on rat and rabbit eradication ,and we will make them available if you need additional input.

Sincerely,

/s/ *Craig S. Harrison*

Craig S. Harrison
Vice Chair for Conservation