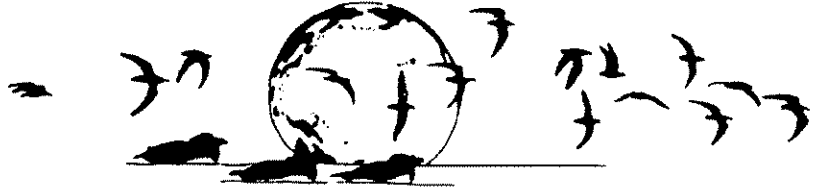


Pacific Seabird Group



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

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September 26, 2006

Deputy Secretary Lynn Scarlett
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Remediation of Lead Paint at Midway Island

Dear Secretary Scarlett:

On behalf of the Pacific Seabird Group (PSG), we request that the U.S. Department of the Interior make the remediation of lead paint from 95 buildings on Midway Atoll National Wildlife Refuge a high priority and provide funds to prevent the continued poisoning of tens of thousands of Laysan Albatross chicks. We understand that the cost of completing this work is estimated to be about \$6 million. PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Peru, Chile, Russia, Japan, South Korea, 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. PSG has long supported seabird and marine conservation in the Northwestern Hawaiian Islands. For example, PSG wrote NOAA's Marine Sanctuaries and Reserves Division in 1991 urging that the waters be classified as a marine sanctuary.

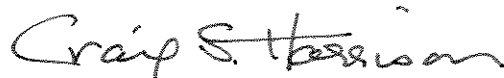
The U.S. Fish and Wildlife Service lists Laysan Albatrosses as "birds of conservation concern" and the North America Waterbird Conservation Plan considers this species to be of "high conservation concern." Albatrosses are long-lived seabirds that lay a single egg each year and frequently skip breeding seasons. The loss of young in any species with low productivity raises issues of population sustainability. Midway Atoll supports the world's largest breeding population of Laysan Albatross.

Lead-based paint has been peeling from 90 aging U.S. Navy structures and five century-old trans-Pacific cable buildings for decades. Many of the Navy buildings were constructed during the Second World War and their walls have been painted many times with lead-based paint. Deterioration of these buildings in the warm salt air has deposited lead-based paint chips near the buildings, some of which has scattered throughout Sand Island. Laysan Albatross chicks ingest these chips and develop a condition known as droopwing which eventually results in death for thousands of Laysan chicks per year. Young birds with droopwing cannot develop their wings to fly and have lead concentration levels in their blood that are ten times the amount that would be considered lead poisoning in humans.

With the recent designation of the Northwest Hawaiian Islands as a National Monument, we believe that the time is ripe to resolve this conservation problem for all time by abating the lead on Sand Island, Midway Atoll. Efforts in 2003 to fence areas to protect Laysan albatross chicks were generally a failure, as were efforts in 2004 and 2005 to place tarps around some of the buildings. We recognize that the U.S. Fish & Wildlife Service has funds to abate 3-5 buildings this year, but this is an insufficient effort to solve this continuing problem.

Please feel free to contact us if you need additional information on this issue.

Sincerely,



Craig S. Harrison
Vice-Chair for Conservation

cc: Ms. Kameran Onley
Dinah Bear, CEQ