



Pacific Seabird Group

Dedicated to the Study and Conservation of Pacific Seabirds and their Environment

15 April 2018

RE: Endorsement for Environmental Assessment of Midway Seabird Protection Plan

The Pacific Seabird Group strongly endorses the proposed plan to eradicate House Mice (*Mus musculus*) from Midway Atoll National Wildlife Refuge.

The Pacific Seabird Group (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, Japan, China, Malaysia, 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 members serve as scientific experts and conservation leaders within their local communities. Collectively, the Group's members have a great deal of knowledge and experience with respect to seabird conservation via invasive mammal eradications throughout the Pacific Region. We have previously provided comments in the Scoping Session of this Environmental Assessment (EA) process.

The concept and execution of rodent eradication has a long history at Midway Island. Rats and mice were introduced during the war years. Rats and mice lead to the extinction of the Laysan Rail (*Porzana palmeri*) through eating the eggs, chicks and adults. Since 1996, when the first efforts to eliminate rats began at Midway, officials included a follow-up plan to eradicate mice. Rats were eliminated from Sand Island and Spit Islands on Midway as well as neighboring Kure Atoll and other USFWS refuges in the region. It is consistent to complete rodent eradication in the Northwestern Hawaiian Islands and apply these lessons learned to future mouse eradication on Ka'oolawe, Maui County, Jarvis Island in the Pacific Remote National Marine Monuments, and Southeast Farallon Island in California.

During the long lead-time to developing the proposal to eradicate house mice from Midway Island, mice were considered a nuisance, a health hazard, and predator on small seabirds, (which potentially affected the threatened Tristram's Storm-Petrel (*Oceanodroma tristrami*) and Bonin Petrels (*Pterodroma hypoleuca*) and the recently established population of Laysan Ducks (*Anas laysanensis*)). However in 2015, mice began to attack nesting albatross, feeding directly off of live birds and increasing their mortality. This aberration has spread and must be stopped before more mice learn to attack more albatross. Since albatross live as long as humans (note the amazing story of

“[Wisdom](#),” a 67 year old Laysan Albatross - *Phoebastria immutabilis* - on Midway Island that hatched an egg this year) the death of adult albatross is particularly serious, and the potential threat to Wisdom must be stopped. Indeed the Laysan Albatross is a sentinel species in the Pacific Basin and for this reason is the featured species on the Pacific Seabird Group logo. Elsewhere, at Gough and Tristan Islands, House Mice also prey on petrels, albatross (chicks and adults), and an eradication is planned in this location as well, in 2019.

In order to eradicate House Mice at Midway, a consortium of U.S. Fish & Wildlife Service, Island Conservation, American Bird Conservancy, U.S. Department of Agriculture Animal and Plant Health Inspection Services, National Wildlife Research Center, the National Oceanic and Atmospheric Administration, U.S. Geological Survey, and the State of Hawaii Office of Hawaiian Affairs choose Brodifacoum as bait. While the Midway Restoration Partnership Group is aware of the high risk of secondary poisoning, this bait choice with enhanced toxicity is essential for ensuring successful results on Midway Island, where there are buildings with food and shelter for the mice.

We concur with the use of Brodifacoum, to be implemented using best practices in concert with the experienced consortium of talented biologists in the Midway Restoration Partnership Group.

The Pacific Seabird Group is happy to provide additional information to assist with the Midway Seabird Protection Plan to protect the important, iconic seabirds of Midway Island. We are looking forward to its successful implementation.

Sincerely,

A handwritten signature in black ink, reading "Mark Rauzon". The signature is fluid and cursive, with the first name "Mark" and last name "Rauzon" clearly distinguishable.

Mark Rauzon
Vice-Chair for Conservation
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