

Comment on EA for Rat Eradication at Lehua

From:
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I would like to comment on this proposed eradication using rodenticides on Lehua island. This was attempted in 2009 and failed. The EA mentions possible causes of the failure, but does not mention the most obvious, which is that rodenticide cannot be effectively distributed on the cliffs of Lehua. The pellets will roll downhill, leaving a density of pellets on the cliffs that is too low to ensure lethal dosage to all rodents in those steep areas.

This means Lehua island may be too steep in terrain to ensure complete eradication of rats. This issue was not addressed in your EA. The steep hills were mentioned, along with discussion of dispersed pellets entering the ocean, but no mitigation was offered. Indeed, using rodenticide, there is no solution to steep cliffs.

If eradication is not feasible on Lehua, then control is the next best thing. Birth control measures may be effective for rat control. This method would also have much less chance of harming non-target species.

I hope you address this issue and I suggest it be addressed in an EIS, since this is a seabird sanctuary with endangered and protected species.

Thank you for your consideration of these comments.

Soma Grismaijer