



May 19, 2017

Dr. Michael Fry  
Dr. Reese Brand Phillips  
U.S. Fish & Wildlife Service  
Pacific Islands Fish & Wildlife Office  
300 Ala Moana Blvd. Suite 3-122  
Honolulu, HI 96850

Dear Dr. Fry and Dr. Phillips,

Island Watch Conservation Science appreciates the opportunity to comment on the federal draft environmental assessment (DEA) for the Lehua Island Restoration (Eradication) Project.

Island Watch is a science based, watchdog organization concerned about the growing increase in pesticide use on island ecosystems. We participated with Animal Legal Defense Fund in the filing of a comprehensive FOIA request surrounding island eradication projects in 2014, and have received details (including a law enforcement report) concerning previous eradication projects. Our fundamental issue is the indiscriminate methodology and poisons used during island eradication projects, and the lack of scientific rigor in determining the need. It is alarming to discover the absence of Integrated Pest Management protocols such as site specific monitoring, which would reveal significant details including an estimate of the rodent population.

After reviewing the draft EA in the *surprisingly short* public comment period of just 15 days following the release date, and communications received back from USFWS, we convey our grave concerns surrounding the accelerated pace and apparent *fast tracking* of this project.

Our recommendation is **Alternative 1 – No action.**

Additionally, we are urging USFWS and DoFAW to conduct a full environmental impact study, by contracting the services of an independent third party - prior to the decision of selecting an alternative. This should be carried out by a qualified, local and trusted entity without any financial interest in the eradication project. And preferably, one that understands the cultural and socio-economic challenges of the people of west Kauai and Niihau. Because of the potential for the Lehua eradication project to have reverberations that touch issues of both social and environmental justice, we do not agree with the USFWS determination letter that supports a FONSI.

1

**Inaccurate/Missing/Needed Information**

**Lack of data on rodent population numbers** - It is shocking that this project has progressed this far, without any understanding of the size of the rodent population on Lehua. The science based approach of Integrated Pest Management (IPM) mandates that site specific monitoring, in order to determine population numbers is the first requirement. Providing anecdotal data on what has occurred on other island ecosystems is not sufficient, and should not be used as a basis for need on Lehua.

**Pesticide Labels** - The labels for diphacinone and brodifacoum are mentioned but not included. Omission of the label doesn't allow for proper public review and comment. Volume totals for pesticide application should be divulged in pounds/tons (not kg per hectare), and clearly state what the cumulative total will be for the project.

**Potential for Fishing Ban** Inconsistent messages have been delivered indicating the possibility (and length) of a fishing ban, and having food shipped for those residents that would be impacted, if a ban on fishing were enacted. What are the details of the operational plan to implement a fishing ban (if necessary) and what is the associated budget? Based on communications received from a FOIA request filed with Animal Legal Defense Fund, the failed Wake Island Project in 2012 resulted in the recommendation for a fishing ban for 942 days. Was this fishing ban implemented and were food sources sent to Wake Island for a period of time?

Other areas of concern with the DEA include the use of out of date studies, and misleading information which underestimates the risks to non-target species. Page 15, Items # 9 and # 10 state that the color of the pellets and size would be a deterrent for birds on Lehua Island. This footage from New Zealand shows birds and crayfish eating blue/green cereal bait following a Department of Conservation poison drop.

Page 56, item 5.5.3.1 downplays impacts to non-target species and cites studies from 1994 and 2002, and throughout the entire document. It is repeatedly stated there is low risk to birds, marine and invertebrate life. As witnessed with Rat Island, a higher number than expected non-target deaths were reported after two rodenticide drops in 2008. According to this law enforcement report done after Rat Island, it was revealed that pesticide laws were violated. (Directly from the USFWS law enforcement report) *"No after application carcass collection or efficacy monitoring was undertaken until eight months later in May and June of 2009. EPA and USDA personnel assert this violates the carcass monitoring and collection provision in the label."* How will USFWS ensure the people of Hawaii that all employees and contractors will not violate federal or state laws?

**Lack of detailed monitoring plan** – including projections for non-target mortality by species, both native and introduced. How will information pertaining to non-target kills be communicated to the press and/or community? What about providing veterinary aid for poisoned non-target species found - Will this be addressed in the operational plan?

An operational plan should include the monitoring of the sub-lethal impacts to wildlife. According to research published, sub lethal exposure to anticoagulant rodenticides can cause a variety of issues including the ability to reproduce, immunosuppression, anemia and possible heart failure.

There is the strong possibility that late nesting birds will still be tending young during the timeframe this project is scheduled to begin. Some birds could be attempting to fledge and take their first flight. With the number of applications anticipated and the noisy, threatening environment created by the

helicopters, hoppers and spilling bait, what are the projections for the number of birds that will abandon their nests due to stress? Is there a higher possibility of bird strikes for fledglings?

**Total Costs** – This project should disclose a line item budget, including costs incurred for creation of the risk assessment (both state and federal), and identify all funding sources and contractors for this project.

**Bait Drift Projections**– what are the projected estimates for how much bait will enter the surrounding marine environment? For Palmyra Atoll – what were the estimates of how much bait went into the water?

**Carcass Gathering** – has been part of the conservation pesticide label in the past. Will this be included as part of the new label? If not, what is the operational plan for carcass removal?

**Justification for the eradication project** – the lack of evidence to support the statement that the rodents are impacting the overall bird population on Lehua. Example cited on page 99 of the state EA indicates that four eggs from a wedge tailed shearwater were found predated on, a species considered by the IUCN to be of least concern with a global population around 5 million. The predation chart from the state EA was not included in the federal EA, however the data is important and demonstrates the lack of supporting science for the advancement of this eradication project.

**Lack of detailed bio-security plan** – page 52 item # 16 refers to Appendix E. Contained in Appendix E is a protocol listing (LIPP) for entering Lehua. It is not a detailed bio-security plan and in order for the project to have long-term success, a bio-security plan that has proven to be effective must be put in place.

In closing, we would like to emphasize that it is the mission of U.S. Fish and Wildlife to protect all living resources in the public trust. The methodology proposed for Lehua, will result in the poisoning deaths of a variety of species and has the potential for longer term, epigenetic impacts to wildlife. This is contradictory to the mission of USFWS, and the fast track that this project has been placed on has resulted in questionable science, and is a tragic representation of the continued exploitation of the people and natural resources of Hawaii.

Best wishes,

Maggie Sergio  
Island Watch Conservation Science