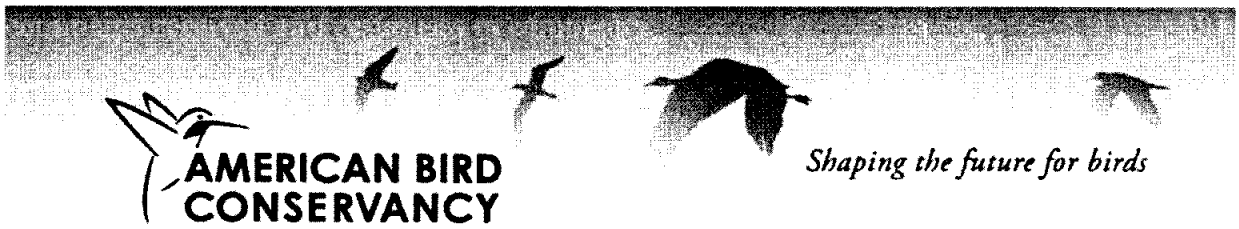

Patrick Chee
Division of Forestry and Wildlife
Department of Land and Natural Resources
1151 Punchbowl St., Rm 325
Honolulu, HI 96813

April 6, 2017

RE: Lehua Island Ecosystem Restoration Project – Public Comments

Dear Mr. Chee and DOFAW staff;

American Bird Conservancy wishes to submit the following comments to the Hawai'i Department of Land and Natural Resources' Division of Forestry and Wildlife on the Draft Environmental Assessment for the Lehua Island Ecosystem Restoration Project (dated March 8, 2017).

American Bird Conservancy (ABC) is a 501(c)(3), not-for-profit organization whose mission is to conserve native birds and their habitats by working throughout the Americas to safeguard the rarest bird species, restore habitats, and reduce threats. ABC recognizes the severe and pervasive threat of non-native mammals to 35 federally and state listed Hawaiian birds, particularly the ground-nesting fresh water birds and seabirds.

Actions such as the Lehua Restoration Project are critical in reducing impacts to species such as Laysan Albatross and Black-footed Albatross, which face multiple threats, including fisheries bycatch (Eich et al. 2015)[i] and of loss of predator-free nesting habitat due to increasing sea level rise (Hatfield et al. 2014)[ii]. Importantly, eradicating the rat population would also benefit eight additional species of seabirds, endemic plants, and the entire island ecosystem. The potential future translocation of endangered Hawaiian Petrel ('Ua'u) to the site could add additional benefits. When done correctly, non-native pest eradications have proven beneficial to island conservation worldwide (Jones et al. 2016)[iii]. Eradicating rodents from Lehua will be a landmark achievement for conservation throughout the Hawaiian Islands.

ABC strongly supports the management objective of eradicating rats from Lehua because of the many conservation benefits for the seabird populations (as detailed in the EA). A decision of "Alternative 1: No action" would result in the continuing loss of seabird eggs,

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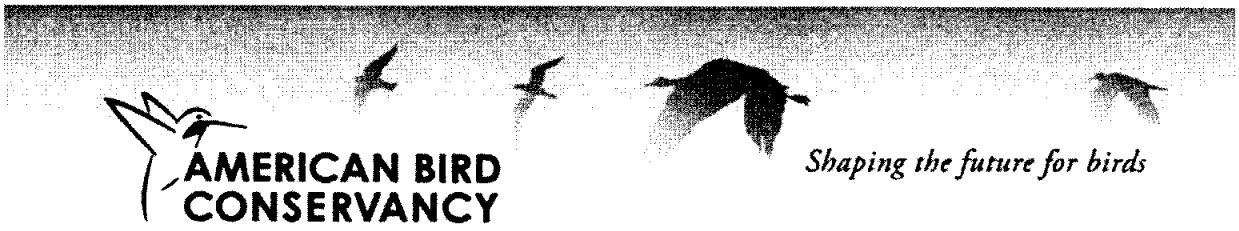

chicks, and adults to rats, and a further degradation of the native vegetation of Lehua. **ABC does not support this alternative.**

We support the goal of eradicating rodents from Lehua, but as currently written we have substantial concerns and comments on the EA. The EA needs to provide more information on many critical aspects of this project:

- The decision thresholds for the number of diphacinone applications and the potential shift to brodifacoum in Alternative 2.
- Detailed monitoring protocols for assessing the lethal and sub-lethal impacts on non-target species.
- Cost/benefit analysis and justification for selecting Alternative 2 vs. Alternative 3.
- Greater detail on the biosecurity measures during and after the toxicant applications.
- Expanded discussion on alternatives considered and reasons they were rejected, such as trapping and contraception.
- An explanation of the communications strategy and transparency measures taken before, during, and after the eradication.

A detailed explanation of these main concerns and comments are as follows:

- **There is no explicit threshold for additional diphacinone applications or shifting to brodifacoum. Related to this, there is no mention of rodent monitoring post-application to determine the toxicant applications or shift.** The EA says there will be at least 3 diphacinone applications and 1–2 brodifacoum applications (pg. 44), but the decision matrix and how the exact number of toxicant applications will be determined is not stated. Presumably, these decisions will be based on the continuing presence of rats on Lehua, but they must be explicitly stated in the EA. These are critical pieces of information, and must be included to determine the total, cumulative toxic load on the environment and the actual risk to non-target animals.

- **As a bird-focused conservation organization, we are highly supportive of reducing non-target impacts to native birds.** ABC fully acknowledges the importance of landscape-level use of toxicants as a tool in addressing specific island conservation needs, but minimizing and monitoring non-target effects is vital. Toxicants are an integral tool in the eradication or control of non-native species that pose significant

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