

Pacific Seabird Group



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

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April 4, 2011

Susan White
U.S. Fish and Wildlife Service
Project Leader
Pacific Reefs NWR Complex
300 Ala Moana Blvd.
Honolulu, HI 96850

Re: Draft EIS for Palmyra Rat Eradication Project

Dear Ms. White:

On behalf of the Pacific Seabird Group (PSG), we offer these comments on the draft Environmental Impact Statement (DEIS) for the Palmyra Atoll National Wildlife Refuge Rat Eradication Project. 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, Russia, Japan, China, Australia, New Zealand, and the USA. PSG's members include 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 been concerned about nonnative creatures such as rodents on seabird breeding islands. We have a history of supporting projects that remove nonnative species to allow indigenous fauna, especially seabirds, to achieve healthy, sustainable populations. For example, in recent years PSG has supported rodent eradication projects on Lehua Island (Hawaii), Rat Island (Alaska) and Anacapa Island (California). Through its conservation fund, PSG has sponsored an eradication project in Fiji.

PSG strongly supports the proposed plan to eradicate ship rats (*Rattus rattus*) at Palmyra to aid in the conservation of seabirds and their habitat. Rats are notorious for their depredations on bird chicks and eggs as well as adults of the smaller species (I. A. E. Atkinson, 1985, The spread of commensal species of *Rattus* to oceanic islands and their effect on island avifaunas. In: P. J. Moors (ed.), Conservation of Island Birds, ICBP Tech. Pub. 3: 35-81). The introduction of rats

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on Midway during 1943 decreased seabird populations there and caused the extinction of the Laysan rail and Laysan finch (H. I. Fisher and P. H. Baldwin, 1946, War and the Birds of Midway Atoll, Condor 48:1-15). The successful eradication of rats on Midway in the 1990s has had positive impacts on small nesting seabirds such as Bonin petrels and storm-petrels (M. J. Rauzon, Island Restoration: Exploring the Past, Anticipating the Future, Marine Ornithology 35: 97-107, 2007). Restoring the Palmyra ecosystem by removing ship rats will pay huge dividends for seabirds and the island ecosystem. For example, small and vulnerable seabird species such as sooty terns, brown noddies and black noddies will almost immediately benefit from the eradication of rats. Many of the eight seabird species that were apparently extirpated from Palmyra by rats (Audubon's shearwater, Christmas Island shearwater, wedge-tailed shearwater, Phoenix petrel, white-throated storm-petrel, Bulwer's petrel, blue noddy and gray-backed tern) may reappear, some possibly very quickly. Rat predation on bristle-thighed curlews may occur on Palmyra because curlews experience a period of flightlessness while molting there (DEIS, p. 103). It is evident that the restoration of Palmyra will allow many species to reclaim their former ranges.

USFWS' Regional Marine Bird Policy for over 25 years has stated that its goal is to "remove all introduced predators from marine bird colonies on all National Wildlife Refuges and encourage their removal from all other colonies." (November 15, 1985). The proposed rat removal project furthers that policy, and completes the eradication of rats from all the remote refuge islands.

Although PSG recognizes that the elimination of alien predators that devastate natural communities and drive some species to extinction sometimes is controversial, we have supported USFWS and other agencies in the past when groups that are ignorant about wildlife management attempt to thwart projects such as this, sometimes by force of litigation. PSG will gladly lend its name and expertise to joint press releases concerning this project to help educate anyone who may be initially opposed to this project.

PSG believes that the goals of this project must be complete eradication. We want to avoid situations that require perpetual control, perpetual funding and perpetual vigilance. Long-term rodent control projects raise secondary poisoning issues over a long period as well as the risk that rats will develop a resistance to poisons. In our considerable experience, we have learned that half-measures are inefficient and are simply a waste of funds.

PSG supports the use of brodifacoum, which is capable of killing a rat after a single feeding. Palmyra is a challenging three-dimensional environment for rat eradication because of the prevalence of crab bait competitors, 50-foot coconut trees, and almost daily rain showers. Rats may only have a single chance to find the bait under these difficult conditions. There was a failed attempt to remove rats in 2001-2002 on Palmyra, and we urge you to make every effort to make this attempt a success. The techniques of aerial broadcasting of bait has greatly improved since 2001, and recent successes include Rat Island (Alaska) and Anacapa Island (California). In contrast to these examples, we have analyzed the "Review of the Lehua Island Rat Eradication

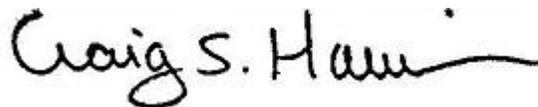
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Project” by Landcare Research, New Zealand (January 2011) where a rat eradication failed. We conclude that the use of a weaker rodenticide (diphacinone, which requires multiple feeds to deliver a lethal dose) and unreasonable restrictions on its use near the shoreline led to failure. Unfortunately, the Lehua project was ultimately a complete waste of funds and human effort. We would like to benefit from lessons learned at Lehua and would object to such restrictions at Palmyra.

The DEIS presents four alternatives: (A) no action; (B) aerial broadcast of brodifacoum; (C) aerial broadcast of brodifacoum with proactive mitigation of risk for vulnerable bristle-thighed curlews; and (D) bait stations with brodifacoum with canopy baiting. We believe that the chances of success will be improved by using large amounts of bait with high toxicity because hermit crabs, not rats, will consume much of the bait. The project may pose a risk to non-target species such as bristle-thighed curlews. During the summer (June-July) window for this operation a small number of young, non-breeding curlews may be present at Palmyra, and significant efforts should be made to protect those birds. For this reason we support Alternative C. We recognize that some curlews may be lost if they eat poisoned hermit crabs, but we believe those losses, while unfortunate, may be a necessary cost to achieve a rat-free environment on Palmyra which will benefit generations of seabirds and shorebirds.

Thank you for the opportunity to comment on the DEIS. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive style with a long horizontal flourish at the end.

Craig S. Harrison
Vice Chair for Conservation