



Shaping the future for birds

February 15, 2011

Mr. Carlton Morris, FWS Project Manager
U.S. Fish and Wildlife Service, Division of Engineering
911 NE 11th Avenue
Portland, Oregon 97232

Re: Engineering Evaluation/Cost Analysis (EE/CA) for Removal of Lead-based Paint from Structures and Lead-contaminated Soil from Midway Atoll National Wildlife Refuge

Dear Mr. Morris:

The American Bird Conservancy (ABC) wishes to commend Midway Atoll National Wildlife Refuge on its progress in removing lead-based paint from the aging buildings there, and particularly for completing the EE/CA, which lays out options for ridding the refuge of this problem once and for all.

ABC has been encouraging the Refuge to take swift action on this issue for a decade, and we are eager to see its resolution. In our reviewing of the EE/CA, we wished to highlight three things as particularly important.

- 1) First, we would like to express our satisfaction with the proposed cleanup level of 75 mg/kg for lead in soil (Appendix C, Streamlined Risk Evaluation in Midway EE/CA Report). This level should provide a safe environment for the humans and wildlife on the island. However, it is important that all soils be removed around the Units until these levels are met and that geomembranes not be used. The geomembranes have a limited life-time, and using them will simply push the problem into the future, and waste the opportunity at-hand to solve the problem in a permanent way.
- 2) We are concerned with the encapsulation painting that has been used and that is proposed within the EE/CA. Encapsulation painting is a temporary fix for the problems of lead poisoning, and anywhere it has been employed or will be employed, there must be a long-term strategy in place to ensure that this problem is addressed over the long term.
- 3) We strongly encourage USFWS to take this opportunity to completely remove the crumbling structures on Midway, which pose risks to the safety of humans and wildlife. Leaving even the foundations creates another problem for future management, as the foundations fall with time. We would applaud a decision to remove the cable company buildings in the first wave of effort, since they clearly pose the most severe problems. ABC would like to express our willingness to assist with outreach to stakeholders and the Historic Preservation Office in any way possible.

Respectfully,

Dr. Jessica Hardesty Norris
Seabird Program Director
jhardesty@abcbirds.org