Coqui Hawaiian Integration and Reeducation Program
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James J. Jones
Deputy Director for Pesticide Programs
Office of Pesticide Programs, USEPA
Ariel Rios Bldg.
1200 Penn. Ave. NW
Wash., D.C. 20460

Re: File 01-HI-03

Dear Mr. Jones:

I am the Director of C.H.I.R.P., a non-profit organization that was formed to rationally deal with the coqui tree frogs that have been introduced to Hawaii. Our membership consists of environmentalists, nurserymen, and concerned citizens who see the threat of frog eradication as worse than the threat of frogs to the environment, the economy, and public health.

While some State and Federal agencies have argued that the coqui is an invasive species in Hawaii, their claims are non-scientific, propagandistic, and self-serving. These agencies are in need of funding for their invasive species work, and Federal money would be available for frog eradication only if the frogs could be defined as invasive. However, a non-biased assessment of the frog situation shows the alleged threat of the frogs is speculative and tainted with conflict of interest. These are not an invasive species, and no emergency exists concerning their presence in Hawaii. Please let me explain.

As you know, to be invasive, an alien species must be shown to be, or considered likely to be, a threat to the environment, the economy, or human health. Are the frogs an environmental threat in Hawaii?

The tree frogs consume insects, including mosquitoes and other invasive insects that threaten agriculture and human health. The Hawaii Department of Agriculture, in fact, considers frogs to be beneficial to agriculture for this very reason. The argument against the frogs suggests that they might threaten endangered native insects. This speculation ignores the fact that the frogs are currently located where there are no such insects. Further, the frogs' consumption of non-endangered, invasive insects, it can be argued, may relieve competitive pressures between endangered insects and invasive ones.

It is also erroneously stated that the frogs have no natural predators in Hawaii, while at the same time it is hypothesized that the frogs will be eaten by rats and mongooses, thereby increasing the populations of these invasive mammals. As you can see, if these mammals eat the frogs, then there are indeed predators for the frogs. Further, for the frogs to increase rat and mongoose populations by adding to these predators' food supply, there would have to be a shortage of food for the rats and mongooses. By this theory, adding to the predator food supply would increase predator numbers. However, there is currently an abundance of food for rats and mongooses in Hawaii, making it unlikely that adding frogs to their diet will increase their numbers.

The final environmental argument is that the frogs will eat too many insects, stealing food from other bug-eaters, such as endangered birds. However, it has never been proven that there is an insect shortage in Hawaii. Further, the same argument could be made against any insect eating bird or reptile on the Island, such as the alien cardinal or gecko. Why only pick on the frogs?

As for the economic impact of the frogs, the only adverse effect of the frogs has been on intra-island shipping, since the Hawaii Department of Agriculture is trying to limit the spread of the frogs. Shipping to the mainland has not been adversely affected, because the frogs cannot survive in the mainland environment. If there were no concern in Hawaii about the frogs, there would be no effect on the economy. Indeed, the concern about the frogs and the need for nurseries to control frogs has created an economic crisis, since frog control is costly and impractical.

As for the health claims against the frogs, there is no scientific study in existence that links the coqui with health problems. Perhaps the only problem some people have with the frogs is with their sound, which some people also enjoy. The problem is not the frogs, but the attitude some people have developed against the frogs. This negative attitude has been fostered by local eradicator propaganda, including that from the Department of Agriculture, which has created a frog mania here. The bird-like sound of the frogs has been equated with the sound of a lawn mower and table saw. While decibel readings of the frogs are high, the same is true for many birds and crickets. People throughout the Caribbean are happily lulled to sleep by the nighttime song of these frogs. Many in Hawaii have also come to appreciate their song. However, the propaganda against the frogs has made many fearful of the sound, causing unnecessary sleepless nights and stress. In short, if the public is told to expect sleepless nights due to frog noise, it will be a self-fulfilling prophecy.

I hope this brief analysis of the situation has shown that the definition of the frogs as invasive pests is opinion and not necessarily fact. While some extremist environmentalists in Hawaii see any introduced alien as bad for Hawaii, this, too, is a value judgment, and not one universally shared by all interested in the environment and quality of life in Hawaii.

The approval of caffeine for eradicating the frogs threatens the environment more than the frogs ever could. The EPA already acknowledges the risks of caffeine to human health, and has required assessments of the impact the spraying would have on non-target species, including humans. This constitutes human experimentation, and without informed consent, since the spraying could be performed without public notice or approval. Further, the spraying will not eradicate the frogs, but may only control their numbers temporarily. It may also increase the spread of the frogs, as some leave the spray site. This means that the caffeine "experiment" could make the "problem" worse, could never solve the "problem", and could potentially damage the environment, economy, and human health.

Interestingly, despite the alleged "emergency" status of the situation, as of this date, fully 9 months since the EPA gave its approval for caffeine trials, caffeine has not been used against the frogs. I suggest the emergency is false, the frogs are here to stay, and we in Hawaii have to get accustomed to their nighttime song. The limited funds of local invasive species interests should be used to fight truly invasive organisms, including stinging caterpillars, fire ants, and mosquitoes carrying dengue fever and malaria. Ironically, these pests may be food for the coqui frogs, which are known to eat mosquitoes, tree borers, leaf hoppers, centipedes, termites, and virtually anything smaller than themselves, including other frogs.

It all comes down to personal taste regarding the sound of the frogs, and the financial interests of eradicators that want Federal money. The EPA should not grant an extension on the use of caffeine against the frogs, which creates more of a threat to Hawaii than any frogs could ever cause.

Thank you for your consideration. Please contact me for further information.

Sincerely,

Sydney Ross Singer
Medical Anthropologist and Biochemist
Director, C.H.I.R.P.