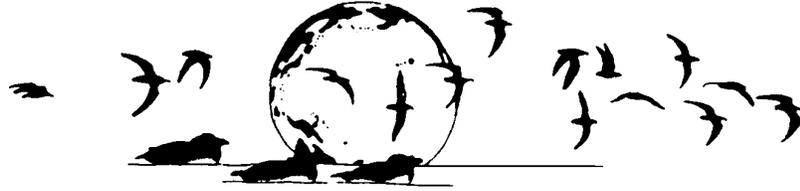


# Pacific Seabird Group



---

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

---

Kathleen O'Reilly, Ph.D.  
Chair  
Department of Biology, University of Portland  
5000 N. Willamette Blvd.  
Portland, Oregon 97203  
503-943-7146  
oreilly@up.edu

Craig S. Harrison, Esq.  
Vice Chair for Conservation  
4953 Sonoma Mountain Road  
Santa Rosa, CA 95404  
202-778-2240  
charrison@hunton.com

Verena Gill  
Chair-Elect  
1101 Lynx Lane  
Eagle River, AK 99577  
907-786-3584  
verena\_gill@hotmail.com

August 15, 2006

Ellen Fritts  
Alaska Department of Fish and Game  
Division of Wildlife Conservation  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Comments on Draft of "Wildlife and Humans at Risk:  
A Plan for Returning Alaska to its Rat-Free State"**

Dear Ms. Fritts:

On behalf of the Pacific Seabird Group (PSG), we offer the following comments on the draft plan "Wildlife and Humans at Risk: A Plan for Returning Alaska to its Rat-Free State" ("Rat Plan") that was issued in July 2006. The Rat Plan constitutes both a needs assessment and a strategic action plan aimed at preventing rats from getting to, or being spread in, Alaska. It also focuses on eradicating rats where they occur and restoring rat-damaged habitats, especially in seabird-rich areas such as the Aleutian Islands.

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, Peru, Chile, Russia, Japan, South Korea, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine and seabird conservation. Since PSG began it has been a strong and vocal advocate of removing invasive species in Alaska, especially in the Alaskan Maritime National Wildlife Refuge. We recently honored G. Vernon Byrd with a Lifetime Achievement Award in part for his work on controlling invasive mammals. PSG members are some of the world's experts in island restoration, and many of our members have worked on seabirds in Alaska. Our interest in this topic is keen, and our comments are as a primary "stakeholder."

We applaud this effort by the Alaska Department of Fish and Game (and the U.S. Fish and Wildlife Service for providing funds) to prepare the Rat Plan. In general, we believe that this draft

represents a good beginning. The final report needs to be redirected toward a concrete (if preliminary) action plan to avoid being just another report that gathers dust on shelves. In addition, it could be improved by professional editing to streamline it.

While the Rat Plan constitutes both a “needs assessment” and a “strategic action plan” aimed at a broad audience, it is far more successful in the former category than the latter. The bulk of the document outlines existing conditions, rat biology, and the state of infrastructure in Alaska. Although this background information is important, its placement buries the urgently-needed practical message concerning which agencies and individuals will take what immediate actions to stop rats during a crisis. Thus, it is not until page 90 that the reader finds Section 7.0 (“Recommendations for Getting Started”). We suggest reconfiguring the document to locate much of the background material in appendices and bringing the materials about a strategic action plan to the front.

We suggest developing a response-capabilities flow chart of how a team would respond to a “rat spill.” Who leads, the Alaska Department of Fish and Game, the U.S. Fish & Wildlife Service or the U.S. Coast Guard? Who follows? What are each agency’s responsibilities? How do the agencies interact? It would be useful to develop an inter-agency phone tree for different regions in Alaska. We recognize that getting such an action plan firmly in place requires the coordination of many state and federal agencies, but at least suggesting a flowchart seems a better approach at this time than waiting for what might be years for something concrete to develop.

One goal of the Rat Plan is to stimulate the establishment of an Alaska Invasive Rodent Advisory Committee. We assume this group would develop many of the action plan’s details, would address federal and state jurisdictional issues, and would resolve such legal issues as the U.S. Coast Guard’s role and responsibility in rapid responses to the escape of rats onto islands. As first responders, the Coast Guard is critical for preventing rodent colonizations from shipwrecks, which are the most likely way rats will reach bird-rich islands. Secondly, the Coast Guard inspects ports and can quarantine cargo to avoid rodent infestations.

The Rat Plan also states “it is critical to prevent (or, alternatively, effectively regulate and enforce) transport of any structures, equipment or supplies that could result in accidental transplants of non-native rodents, especially to and among Alaska’s islands.” Who are the responsible entities for regulating such activities? This issue needs to be evaluated in depth, and appropriate legal and enforcement mechanisms should be developed as soon as possible. Clarifying this responsibility would be a tremendous contribution to rat invasion prevention.

The draft also notes “Perhaps the greatest challenge for those working to develop rodent management programs is that of integrating the various departments, agencies, and organizations into a cohesive unit. This plan is designed to bolster and coordinate efforts among many parties to achieve success....” Answering this and other critical questions seems to be left to another report that may take years—if it ever is completed. We strongly suggest that the final report make some genuine progress in providing answers and direction. We hope that the Rat Plan is widely embraced by agencies and that its issuance can achieve some immediate integration so that a shipwreck does not introduce rodents to any key seabird colonies and that inter-agency teams can respond if such a catastrophe happens this winter.

It is an unfortunate fact that conservation actions to halt population declines are only made a priority when the Endangered Species Act is invoked. However, stressing an ecosystems-approach may be a way to broaden the justifications for extensive poisoning campaigns.

Rodent control verses eradication also should be looked at in greater detail than it is in this draft, considering the costs of control due to mainland proximity, the size of island, non-target small mammals, risk of reinvasion, landscape challenges, etc. Eradication is not likely possible in many situations in Alaska, so the ongoing costs of control and the risk of bait resistance might be examined in more detail. Also, global warming implies better conditions for the survival of rodents that do escape to shore.

We suggest that other rodent contingency plans be referenced in the bibliography and include some suggestions in a appendix to this letter. Thank you for the opportunity to comment on the Rat Plan. We will gladly provide additional comments or expertise at your request.

Sincerely,

*/s/ Craig S. Harrison*

Craig S. Harrison  
Vice-Chair for Conservation

Enclosure

## APPENDIX

Brooks, J. E. 1994. Bionomics and management of commensal rodents. Denver Wildlife Research Center, unpubl. 100 pp.

DeGange, A.R., A. Sowls, L. Fairchild. 1995. A strategic plan to protect island ecosystems in Alaska from the introduction of rodents. Unpublished report prepared by USFWS Region 7, Anchorage, AK. 11 pp.

Department of Conservation (DOC), New Zealand, in-house reports:

Investigations in Relation to Rats. Raoul Is. 1994.

Maud Island Pest and Weed Operations Plan, 1991-1996.

Northland Conservancy Island Mammal Pest Invasion Contingency Plan. 1999. 53 pp. plus appendices.

Southland Conservancy Animal Pest Invasion Plan. Vol. 1. Pest Invasion Contingency First Response. 14 pp.

Takapourewa (Stephens Island) Nature Reserve Plan for Management, draft 1992.

The Prevention of Predator Invasion ... in the Nelson/Marlborough Conservancy. 1997.

Vertebrate Pest Control Manual-Toxins and Poisons. 1997. Nicole Haydock (ed.).

Eradication of cats and sheep from Socorro Island, Veitch, C.R. 25 pp.

Wellington Conservancy Mammal Contingency Plan for Islands on the Kapiti Coast and in Wellington Harbor. 1999.

Everett, W. T. 1999 Wake Atoll Eradication Strategies. Endangered Species Recovery Council. Unpublished report prepared by ESRC, San Diego, CA.

Murphy, J. G. 1991. Report of rat eradication operations conducted under specific emergency exemption to use Talon-G containing brodifacoum in a field situation on Rose Atoll National Wildlife Refuge, American Samoa. Unpublished report.

Murphy, J. G. 1994. Rat Eradication on Green Island, Kure Atoll. Unpublished report prepared by State of Hawaii, DLNR, Honolulu; and Animal Damage Control, U.S. Depart. of Agriculture, Honolulu.

Murphy, J. G. 1997. Rat Eradication on Eastern and Spit Island, Midway National Wildlife Refuge. Wildlife Services. Honolulu, HI.

Murphy, J. G. 1997. Rat Eradication on Sand Island, Midway National Wildlife Refuge. Wildlife Services. Honolulu, HI.

Murphy, J. G. 1994. Rat Eradication on Green Island, Kure Atoll. State of Hawaii, DLNR. Animal Damage Control. Depart. of Ag. Honolulu, HI.

Norman, F. I. 1975. The murine rodents *Rattus rattus*, *exulans*, and *norvegicus* as avian predators. Atoll Research Bulletin. 182:1-13.

Ohashi, T. 1992. Application for specific emergency exemption to use Assault and Weatherblok in a field situation eradication of Polynesian Rats (*Rattus exulans*) on Rose Atoll National Wildlife Refuge, American Samoa. Animal Damage Control, Depart. of Ag., Honolulu, HI.

Pain, D. J., M. de L. Brooke, J. K. Finnie, and A. Jackson. 2000. Effects of brodifacoum on the land crab of Ascension Island. J. of Wildlife Management. 64(2):380-387.

Rauzon, M. J. 2001. Vertebrate Pest Eradication and Prevention Plan for the Pacific Islands Ecoregion, Division of Ecological Services, U.S. Fish and Wildlife Service, Honolulu, HI.

Spennemann, D. H. R. and G. Rapp. 1989. Can rats colonize oceanic islands unaided? An assessment and review of the swimming capabilities of the genus *Rattus* with particular references to tropical waters. Zoologische Abhandlungen, Staatlichen Museum fur Tierkunde Dresden 45 (7) 81-91.

Taylor, R. H., G. W. Kaiser, and M. C. Drever. 2000. Eradication of Norway Rats for recovery of seabird habitat on Langara Island, British Columbia. Restoration Ecology. 8(2):151-160.

USFWS (U.S. Fish and Wildlife Service. YEAR. Environmental Assessment-Proposed Emergency Use of Toxicants to Prevent Accidental Introductions of Rats from Shipwrecks on Islands in Alaska Maritime National Wildlife Refuge. Alaska Maritime National Wildlife Refuge, Homer, AK.