

Pacific Seabird Group



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

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February 28, 2005

Mr. Harry Burroughs

Director

House Resource Subcommittee on Fisheries and Oceans

H2-188 Ford House Office Building

Washington, D.C. 20515-6232

Re: H.R. 298 – Opening the Farallon Islands National Wildlife Refuge to Public Access

Dear Mr. Burroughs:

On behalf of the Pacific Seabird Group (PSG), we offer the following comments on H.R. 298, which would open the Farallon Islands National Wildlife Refuge to the public. This bill apparently is sponsored on behalf of ham radio operators. 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 conservation. PSG has been involved with issues relating to national wildlife refuges for over 30 years and has provided its views to federal agencies and Congress on a wide variety of issues that affect seabirds.

Congressmen Rahall (D-WV) and Pombo (R-CA) introduced H.R. 298 together, although we understand that Congressman Rahall subsequently has dropped his sponsorship of the portion of the bill that opens the Farallons NWR to public access. As currently written, H.R. 298 would require the U.S. Fish & Wildlife Service to provide public access to the Farallon Islands National Wildlife Refuge. Although H.R. 298 does contain provisions to limit public access to the Farallon Islands National Wildlife Refuge to certain times of the year and to protect wildlife populations, PSG strongly opposes this bill.

PSG opposes this bill on several grounds: enormous wildlife populations concentrated in a small area, potential disturbance of wildlife by inexperienced visitors, habitat damage done by inexperienced visitors, introduction of exotic plants and animals, public safety, and loss of management control by refuge managers who know the most about protecting the resources under their stewardship.

The Farallon Islands lie 28 miles west of the Golden Gate. They are part of the city of San Francisco and are the largest seabird breeding colony in the contiguous United States. Over 250,000 seabirds of 12 species, including four California Bird Species of Special Concern, currently use these islands as breeding habitat. These islands also provide a major roosting site for federally-endangered California Brown Pelicans. Although they are beyond PSG's purview, thousands of marine mammals, including California sea lions, northern elephant seals, threatened Steller's sea lions, harbor seals, and, recently, northern fur seals concentrate on these islands, especially during the winter.

Our greatest concern is about disturbance of nesting seabirds. Seabirds have evolved on remote island ecosystems free from humans, so they are extremely sensitive to human disturbance. In the past, human disturbance at the Farallon Islands drove some seabird populations nearly to extinction. During the seabird breeding season, human intrusion – even unintentional intrusion – can flush birds that are breeding in dense colonies off their nests, leaving their eggs and chicks vulnerable to opportunistic avian predators such as gulls.

Habitat destruction is another concern. Underground burrows of cavity-nesting seabirds, which are found throughout the refuge, can easily be crushed by human activity in inappropriate areas. These burrows persist throughout the year, are used many years in a row by the same pairs of birds, and are vulnerable even after the seabird breeding season is over. Hence, the destruction of burrows can make it difficult for experienced breeders to breed successfully until they can establish new territories and dig new burrows.

Greater human activity at the Farallon Islands also could increase the possibility of introducing exotic non-native plants and animals. Exotic introductions of plants and animals to sensitive island ecosystems have caused major disruptions to wildlife populations, and have required multi-million dollar eradication responses throughout the Pacific Rim, including at several national wildlife refuges.

PSG also has concerns about public safety if the refuge were opened to public access. These rocky islands are often exposed to harsh weather conditions, and access requires experienced personnel and special equipment. The regular landing on the island uses a derrick crane like those found on most offshore oil platforms for people and equipment to come ashore or leave the island. Therefore, access to the Farallon Islands is difficult and challenging even for trained island biologists, let alone inexperienced members of the public. Injury to a visitor could require the use of a helicopter for airlifting the person off the island, causing additional disturbance to birds.

The National Wildlife Refuge System Improvement Act of 1997 authorizes refuge managers to decide on a case-by-case basis which uses are compatible with the purposes of that particular refuge and which uses are not. This system has worked well, allowing managers to find the proper balance of access and wildlife protection for each particular refuge. For example, refuge managers in Hawaii have frequently allowed ham radio operators to visit the remote equatorial refuges of Howland, Baker and Jarvis under highly specified circumstances, usually accompanied by a refuge biologist. H.R. 298 would amend the existing general law to provide access to a few specific refuges. PSG believes that this action might set a precedent that reduces the ability of professional refuge to managers effectively the refuges under their responsibility and control.

PSG strongly opposes this legislation, and urges Congress to maintain current access laws regarding the Farallon Islands National Wildlife Refuge. This refuge is a unique site of national and international biological significance, and all efforts should be taken to ensure that the wildlife of the Farallon Islands, "California's Galapagos," is not subject to unnecessary threats.

Thank you for the opportunity to comment on this bill. We will gladly provide additional comments or expertise at your request.

Sincerely,

/s/ Craig S. Harrison

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Vice Chair for Conservation

Mr. Harry Burroughs

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