



Pacific Seabird Group

Dedicated to the Study and Conservation of Pacific Seabirds and their Environment

Mr. Greg Siekaniec
Regional Director, Alaska Region
1011 E. Tudor Rd.
U.S. Fish and Wildlife Service
Anchorage, AK 99503

April 3, 2017

RE: Letter to USFWS Regarding the Proposal to Rescind the Kodiak Road Closure to Hunting

Dear Mr. Siekaniec:

The Pacific Seabird Group is concerned about the potential negative impacts to Aleutian Tern colonies that opening the road system to subsistence bird harvest could have on Kodiak Island.

The Pacific Seabird Group (PSG) is an international, non-profit organization that was founded in 1972 to promote knowledge, study, and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, 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. Within PSG, we have an Aleutian Tern Technical Committee working on coordinating conservation actions for Aleutian Terns (*Onychoprion aleuticus*) owing to the species' declines across Alaskan colonies, including tern colonies at Kodiak Island.

John Reft, Sun'aq Tribe of Kodiak, has submitted a proposal to the Alaska Migratory Bird Co-management Council (AMBCC) to rescind the closure to subsistence bird harvest of the Kodiak Island roaded area. Currently, Alaska Subsistence Spring/Summer Migratory Bird Harvest Regulations state that the lands and marine waters of the Kodiak Island roaded area (aka, road system) are closed to migratory bird hunting/egg gathering within 500 feet from the water's edge. PSG is concerned about the potential impacts that opening the road system to subsistence bird harvest could have on Aleutian and Arctic Tern colonies in the region. Both tern species have declined substantially along the coast of Alaska in recent decades; Aleutian Terns by an estimated 93% (Renner et al. 2015), and Arctic Terns by more than 90% regionally in the Gulf of Alaska (Denlinger 2006).

Currently, the largest Aleutian Tern colonies remaining in the Kodiak Archipelago are located at the heads of bays along the road system. In recent years, two to three Aleutian Tern colonies have been active, each with between 100-200 birds (Corcoran 2017). In contrast, remote tern colonies (i.e. not on the road system) are dominated by Arctic Terns (Corcoran and Tengeres 2015). The mixed species tern colonies both on and off the road system also typically contain a small number of nesting Mew Gulls. When concerns were raised about tern colonies at public meetings held by the Sun'aq tribe regarding the proposed changes in regulations, the tribe submitted a second proposal to

close the Kodiak road system to Aleutian and Arctic Tern subsistence harvest to compliment the initial proposal to open the road system.

The major emphasis in the original proposal submitted to the AMBCC in December of 2015 was the need to increase gull harvest opportunities for people who do not have the resources to get to the islands that are open for harvest. Currently, Kodiak residents need boats to get 500 feet from the water's edge to harvest at seabird colonies within the roaded area. However, the most common gull species nesting in the Kodiak Archipelago are Glaucous-winged Gulls and Black-legged Kittiwakes, all of which nest on offshore islands and rocks already within the open area for subsistence harvest. Thus opening the shoreline and waters within 500 feet will only increase subsistence egg harvest opportunities for Mew Gulls. Currently the only Mew Gull nests along the Kodiak road system are in tern colonies. If gull egg harvest opportunities are of particular interest, as indicated in the first proposal, we believe there could be high harvest pressure at the few tern colonies on the road system where Mew Gulls nest, since this is the only gull species not available for harvest under current regulations.

In addition, the heads of bays where Aleutian Terns currently nest on the Kodiak road system are already subject to high disturbance levels. The existing tern colonies are on private and state-owned lands used by a wide variety of recreationists, and most are leased for livestock grazing. These colonies are also associated with the American, Olds, and Pasagshak Rivers which are productive salmon spawning habitat that attract large numbers of a variety of bird species, and are likely to be targeted for subsistence harvest opportunities. Despite the follow-up proposal to keep the road system closed to the harvest of terns, PSG is concerned that there will be increased human disturbance at vulnerable tern colonies, like stepping on cryptic tern eggs, and secondary effects such as egg predators like foxes and ravens following humans) could lead to reproductive failure or colony abandonment.

Finally, while PSG respects that Alaska Natives have a long history of harvesting migratory birds and their eggs during the spring season with no significant impacts to those populations, we are concerned that others outside the native community on Kodiak might also participate. According to current regulations, all permanent Kodiak residents would be eligible to hunt regardless of their individual tradition of spring migratory bird hunting. Within the road system, there are approximately 11,000 residents, of which only about 15% claim to be fully or partly Alaska Native. One of the primary reasons for the road closure that was originally proposed in 2003 by the Kodiak Area Native Association was to provide protection for birds in an area accessible to such a large concentration of potential subsistence harvesters. While it is impossible to determine how many of the residents would participate in the spring hunt, we believe these concerns are as relevant today as they were 14 years ago.

In summary, while PSG supports and respects the traditional use of seabirds by Alaska Natives, we believe that the potential negative consequences of the proposal (disturbance to Aleutian and Arctic Terns) outweighs the minimal gain in subsistence harvest opportunities, and in particular, drives the Aleutian Tern to local extirpation. We encourage the FWS to reject the proposal to rescind the Kodiak Island road closure and we thank you for considering our concerns.

Mark Rauzon
Vice Chair for Conservation
Pacific Seabird Group

Cc: Executive Director, Alaska Migratory Bird Co-management Council (Patty Schwalenberg),
Alaska Migratory Bird FWS Coordinator (Donna Dewhurst,
ADF&G Commissioner (Sam Cotton, and Bruce Dale)

Citations:

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