## Pacific Seabird Group



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

February 17, 1990

Oil Spill Restoration Planning Office 437 E. Street, Suite 301 Anchorage, Alaska 99501

Dear Sir,

The Pacific Seabird Group is a scientific organization with over 400 members. Our primary interest is in the scientific study and conservation of seabirds of the Pacific Ocean. Many of our members have had considerable experience in seabird research related to the Exxon Valdez oil spill area, before, during, and after the spill. We also have had considerable experience with research on seabird species in other areas and other spills.

We understand your office is in the process of planning restoration of the environmental and recreational areas impacted by the Exxon Valdez oil spill. The restoration process for the Exxon Valdez oil spill is extremely important and does offer some real possibilities to help recovery. Our comments relate to measures that can be of the most significant value to the restoration of marine birds, for that is our expertize.

We recommend that four of the most effective marine bird restoration measures could be taken are:

1) Purchase old growth forest habitat in Prince William Sound and the Gulf of Alaska oil spill area. These areas are important nesting habitat for the Marbled Murrelets. This unique species nests almost exclusively in old growth trees and has been reduced in numbers over much of it's range. The oil spill area is perhaps the world's major concentration area for this species. Logging in the spill area would further reduce their numbers and make complete recovery from the spill very unlikely.

Most private timbered land tracts in Prince William Sound, the outer coast of the Kenai Peninsula, Kackemack Bay, Afognak Island, and Kodiak Island have, are or soon will be scheduled for clear cut. These areas include inholding in the Chugach National Forest, Kenai Fjords National Park, and Kachemak Bay State Park as well as areas adjacent to them. Also there is private ownership of the timber rights on Delpin and Discoverer Islands of the Alaska Maritime National Wildlife Refuge. All of these areas should be protected from logging.

Protections of old growth areas would also reduce disturbance to birds, as well as protect important nearshore habitats from disturbance and degradation in water quality caused by logging activities and bark deposits onto the near shore bottom. Bald eagles would also benefit since they use these same forest stands for nesting.

- 2) Purchase privately owned seabird colonies for inclusion into conservation designations and protection. Several significant seabird colonies in the oil spill area, or very close to it, are in private ownership. Most of these have been conveyed to native corporations through the Alaska Native Claims Settlement Act. These colonies need to be protected. Any further disturbance or destruction to these colonies will reduce population even further and impede reproduction at these sites needed for recovery of populations. Table 1 lists colonies which should be purchased for restoration of seabirds.
- 3) Remove introduced predators (foxes, rats, etc.) from islands where they have severely reduced or destroyed seabird colonies would be a good form of mitigation. Millions of dollars have been spent on cleanup and wildlife monitoring following the Exxon spill, but ironically few understand that alien predators have eradicated far more birds than the spill and that there is no chance of recovery for these sites, until introduced predators are removed.

The U.S. Fish and Wildlife Service has recognized the problem for many years, but has spent only very limited funds to remove introduced predators and have been removed to clear only one island per year on average. Dramatic recoveries of bird life have been noted for these islands from which predators have been removed. Table 2 identifies islands the the Fish and Wildlife

Service has identified as priority for fox removal. In addition to fox removal, work must be initiated to remove introduced rats, ground squirrels, and rabbits.

4) Buy back oil leases sold for Bristol Bay and close the area to oil development. Bristol Bay has tremendous wildlife values which include important seabird colonies, feeding and wintering areas. Oil transport from the area would add risk to other areas including Unimak Pass, a very important migration corridor. Preventing oil development in this area would be the best way to minimize threats to this critical area.

Please consider these suggestions in any settlement agreement for the restoration of the Exxon Valdez oil spill or funds made available from the lawsuits or other sources.

Sincerely,

Malcolm C. Coulter Chairman Pacific Seabird Group

c.c. - Bill Rielly, Director, U.S. Environmental Protection Agency Charles Cole, Attorney General, State of Alaska

TABLE 1. SEABIRD COLONIES TO PURCHASE.

NAME	LONGITUDE	LATITUDE	TOTAL SEABIRDS
THE TRIPLETS	152.4733	57.9861	109115
GULL ISLAND	151.3264	59.5844	17173
HIGH ISLAND	162.3228	54.8117	135316
MIDDLETON ISLAND	146.3244	59.4361	154146
POA ISLAND	165.4983	54.1283	41299
TANGIK ISLAND	165.4853	54.1444	25810
PUFFIN ISLAND	165.5222	54.1397	36535
ANANIULIAK ISLAND	168.9028	53.0078	23633
TUGIDAK ISLAND**	154.5	56.5	3740
CHINIAK ISLAND & ROCKS	152.145	57.6342	17895
CHERNI GROUP	162.3647	54.6367	9390
BROTHERS ISLANDS (EASTERN)	158.8233	55.9231	15300
PUFFIN ISLAND	153.3567	57.0058	10515
KEKUR ISLAND	152.3003	57.6508	2248
SYITLAK ISLAND	152.3528	57.6333	1366
CATHEDRAL ISLAND	153.1328	57.2003	6008
AMEE ISLAND	153.1878	57.2022	2004
UTESISTOI ISLAND	152.3664	57.6258	2372
SHEEP ISLAND	153.2392	57.2172	1791
ADUGAK ISLAND	169.1622	52.9097	877
MIDDLE ISLAND	152.3481	57.645	482
JOHN ISLAND	153.4578	57.1083	2054
NUT ISLAND	153.1558	57.205	864
CUB ISLAND	153.2025	57.2119	424
SUNSTROM ISLAND	154.14	56.6892	1275
BROTHERS ISLANDS (WESTERN)	158.8528	55.9294	1446
CAPE DARBY	162.7881	64.3306	1365
CAPE DENBIGH SOUTH	161.5258	64.3828	8976
CAPE DENBIGH NORTH	161.5264	64.4128	7279
KING ISLAND	168.0547	64.9764	245910
UNNAMED ISLAND	163.8186	66.3006	100
FOX ISLAND	162.4261	54.9553	Present
TILLIMOOK ROCK, OREGON	124.0186	45.9375	6072
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<sup>\*\*</sup> TUGIDAK ISLAND IS ALASKA STATE OWNED. MINERAL LEASES NEED TO PURCHASED. TUGIDAK IS YERY IMPORTANT TO WATERFOWL AND IS THE WORLD'S LARGEST HARBOR SEAL ROOKERY.

TABLE 2. Islands from which introduced foxes should be removed as part of the Exxon Valdez oil spill restoration process.

ISLAND	ACREAGE	- <b>ā</b> .	FOX SPECIES
Kasatochi	717		arctic
Bobrof	1,980		11
Gareloi	16,964		11
Herbert	13,790		11
Igitkin	4,710		11
Segula	8,192		,
Outer Iliasik	2,240		red
Semisopochnoi	56,013		arctic
Ugamak	3,200		11
Chugul	4,301		11
Umak	9,796		11
Kagamil	10,342		11
Amatignak	8,533		. 11
West Ulak	7,646		. 11
Little Koniuji	14,055		10
Inikla	80		10
Elma	716		11
Little Tanaga	17,852		. 11
Little Sitkin	15,701	•	11
Seguam	53,292		11
Yunaska	43,520		. 11
Great Sitkin	39,219		11
Kagalaska	29,355		11
Cherabura	7,440		11
Chuginadak	42,257		red
Kanaga	91,716		arctic
Tanaga	128,000		H
Ukolnoi	11,520	#	red
Simeonof	10,000		arctic