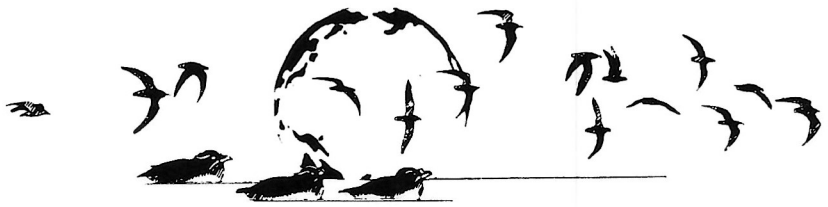
Pacific Seabird Group



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

Craig S. Harrison
Vice Chairman for Conservation
4001 North 9th Street #1801
Arlington, Virginia 22203

November 20, 1992

BY FAX (hard copy to follow)

Dr. David R. Gibbons
Exxon Valdez Oil Trustee Council
645 G Street
Anchorage, Alaska 99501

Re: Comments on Draft 1993 Work Plan

Dear Dr. Gibbons:

This letter contains the Pacific Seabird Group's (PSG) comments on the draft 1993 Work Plan. PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the entire Pacific Basin, and includes biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird refuges and individuals with interests in marine conservation. PSG has hosted symposia on the biology and management of virtually every seabird species that the Exxon Valdez oil spill affected. This letter has been approved by PSG's Conservation Committee and senior members of its Executive Council.

PSG is disappointed that the Trustees propose to spend $38 million on restoration activities during 1993 that will have little tangible benefit to seabirds. While we are impressed with the quality of parts of the work plan, some proposals do not meet the high standards that we expect. In June we noted that the $1 billion trust fund must be spent wisely if the immense job of restoration is to be accomplished. We find little wisdom with respect to seabirds in the 1993 Work Plan.

We have previously observed that the best means to restore Alaska's seabird populations would be the removal of rats, foxes and other alien creatures from colonies and former colonies. PSG's June 3, 1992 comments addressed the draft Restoration Framework and the Trustees' request for suggestions for the 1993 Work Plan. We recognize that

establishing a new infrastructure to restore the marine resources has been a difficult and demanding task. Nevertheless, we want to be assured that PSG's input during the past two years has not been ignored. The 1993 Work Plan does not include our key suggestion — funds to eliminate foxes, rats and other predators from present and former seabird colonies. In addition to alcids and larids, predator removal would help the entire bird community to recover, including island-nesting sea ducks, dabbling ducks, oystercatchers and wintering waterfowl. The Canadian Wildlife Service will soon use funds from the Nestucca oil spill to restore seabird habitat in the Queen Charlotte Archipelago, British Columbia, by removing introduced rats and raccoons.

PSG has previously submitted a list of islands where foxes should be removed. The following islands are those closest to the oil spill area depicted in the 1993 Work Plan and perhaps easiest for the Trustees to justify at this time: Chernabura, Simeonof and Little Koniuji (Shumagin Islands) and Elma and Inikla Islands (Sandman Reefs). Most birds killed in the spill are migratory. Based on finding oiled seabirds in the Pribilof Islands during 1989, seabirds from the Shumagin and Aleutian Islands were probably oiled. Moreover, ground squirrels should be removed from Kak Island (near the Semidis) where they may be harming Ancient Murrelets. While Kak Island is outside the map of the spill area, it is small and rodent elimination is feasible. Methods developed there could be used at other larger islands within the spill area that have exotic rodents. We request that the Trustees ask the U.S. Fish & Wildlife Service to submit for public review and comment a multi-year plan that outlines a comprehensive approach to removing all exotic predators from seabird islands in Alaska. Such a plan should identify the methods by which such predators would be removed and include realistic milestones that would allow completion of the task within five years.

We are concerned that the Trustees are spending too much money on overhead and projects that do not directly restore natural resources. We ask the Trustees to address our suggestion that non-governmental organizations have an opportunity to propose projects without using a "middle man" agency that expends an undisclosed but probably large amount of funds for overhead. Such an approach will enable the greatest restoration of natural resources. Currently, the Trustees seem to be applying an agency pork barrel approach. PSG might be interested in adopting the Alaska Maritime National Wildlife Refuge and applying for funds to remove predators, but there is no mechanism to do so.

While we normally use our expertise to focus our comments on seabird restoration, we question the basis for studies of cultural resources (93005; $400K), public education (93009; $317K) and subsistence foods (93017; $360K). These projects are probably valuable, but do not seem to restore any natural resources that the oil spill damaged.

The Trustees have documented that the spill killed as many as 645,000 seabirds for which five seabird projects are funded at a cost of $1,535,000 (out of $38,000,000) in 1993. We think seabirds suffered more than 4 percent of the harm to Alaska's natural resources. PSG could not justify any of the Trustees' projects ahead of the removal of introduced predators from seabird colonies. Nevertheless, we endorse the following projects:

Harlequin Duck Restoration (93033; $718K)
Pigeon Guillemot Recovery (93034; $166K)
Black Oystercatchers/Oiled Mussel Beds (93035; $108K)
Marine Bird/Sea Otter Surveys (93045; $262K)
Bald Eagle Habitat (93052; $188K).

The $718,000 in the Harlequin Duck project could restore more Harlequin Ducks if it were devoted to protecting habitat in such areas as Kachemak Bay State Park, Afognak Island and other areas scheduled to be logged.

PSG is surprised that the Trustees included a project to enhance murre productivity by using decoys or recorded calls at colonies (93022; $281K). In June we expressed our objections concerning this project and doubt that these techniques will improve murre populations in Alaska. Any minor success attributed to these unproven techniques cannot be justified under the cost/benefit analysis in the Trustees' restoration criteria. We know of a similar project at Kilauea Point, Hawaii, at a Laysan albatross colony that was deemed a failure by the U.S. Fish & Wildlife Service in the 1980s. Murres were hit very hard by the spill and have undergone continued "mortality" due to breeding failures since the spill. As part of any decoy study, it is essential that any "natural recovery" be documented by censusing and monitoring breeding attempts throughout the spill area. Any improvement that may be seen in decoy areas must be proven to be above natural recovery to warrant any conclusion that seabirds were restored or to justify its further use for this or other spills.

PSG supports habitat acquisition. Because protecting habitat will benefit seabirds and all other wildlife species, protect commercial and sport fishing and recreation, we support the habitat acquisition projects (93061; $535K & 93064; $20 million). PSG supports areas identified in Alaska State Legislature bill HB411, which has had broad public comment, review and support. We have identified in earlier correspondence several private seabird islands that should be acquired. Because land acquisition can be extremely expensive, the Trustees should use conservation easements instead of outright purchase whenever feasible.

PSG will sponsor technical sessions on damage assessments and restoration of seabirds following the Exxon Valdez oil spill at its annual meeting in Seattle from February 9-13, 1993. We invite the principal investigators of seabird projects to present papers on their proposed studies and encourage the Trustees and their chief scientist to attend this meeting and discuss seabird restoration.

In conclusion, PSG once again urges the Trustees (1) to fund the only project that is certain to increase the populations of the twenty or so seabird species injured by the oil spill, namely, the removal of predators from colonies; and (2) to protect habitat under imminent threat as soon as possible to halt further losses.

Sincerely,

Craig S. Harrison