



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

1011 E. Tudor Rd.

Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

OOS - 28.0

NOV 27 1992

Craig S. Harrison  
Vice Chairman for Conservation  
Pacific Seabird Group  
3731 North 6th Road  
Arlington, VA 22203

Dear Mr. Harrison:

Thank you for your recent letter concerning use of *Exxon Valdez* oil spill restitution funds for fox eradication in the Alaska Maritime National Wildlife Refuge (AMNWR).

The U.S. Fish and Wildlife Service (Service) agrees that eradication of introduced foxes from refuge seabird islands by the year 2000 is a worthy goal, and restitution monies from the *Exxon Valdez* settlement are a potential source of funds for an expanded fox eradication program. However, additional funding alone will not solve the fox problem on our seabird islands. Both regulatory changes and additional funding will be required.

Under current regulations, the only methods the Service can use to eradicate foxes are trapping and shooting. With only these mechanical means available to us, the Service can only hope to eradicate foxes from relatively small islands. On the larger islands, foxes will only be eliminated if additional methods, specifically, the poison Compound 1080 and M44 cyanide devices, can be used. Neither of these methods is currently authorized for removal of arctic foxes. Compound 1080 would have to be re-registered, and the label for M44 devices would have to be amended. The process of re-registering Compound 1080 and amending the label for M44 devices requires the approval of three different agencies and would likely generate controversy. At minimum, the process of approving Compound 1080 would take more than a year, and the outcome can only be characterized as uncertain. Currently, the Service does not have the staff necessary to carry out what would be a prolonged and complicated permitting process.

Under our existing fox eradication program, foxes are being removed from one or two small islands per year using trapping and shooting. Based on our most recent inventory, 46 islands in Alaska still have introduced foxes. Of these islands, 19 are entirely refuge lands, and these islands would be targeted in any expanded fox eradication program. With the use of Compound 1080, it is entirely possible that foxes could be eradicated from all of these islands. Thus, the goal of eliminating foxes from the AMNWR

by 2000 is technically feasible, but only with regulatory changes and additional funding. The Service would greatly appreciate the support of the Pacific Seabird Group in both obtaining the regulatory changes and the necessary funding.

As I stated above, restitution funds from the *Exxon Valdez* settlement are a possible source. The U.S. Department of the Interior (DOI) is one of three federal agencies that are trustees for the *Exxon Valdez* settlement monies, including both restitution and restoration funds. The other federal agencies are the U.S. Department of Commerce (National Marine Fisheries Service) and U.S. Department of Agriculture (U.S. Forest Service). These agencies have recently begun the process of planning how to spend restitution funds. A restitution proposal will be published and public comments sought, probably in early 1993, although some delay due to transition is likely. Ultimately, the three federal trustees will be responsible for deciding how the restitution monies are spent, and your group's views on the use of restitution monies will appropriately be addressed to the trustees. A list of the current federal trustees and their mailing address is enclosed.

I have forwarded a copy of your letter to the DOI's Office of Environmental Affairs (OEA) and asked that the Pacific Seabird Group be placed on the mailing list for restitution planning. OEA is providing staff support for restitution planning to the Secretary of the Interior. If you have specific questions about restitution planning, I suggest you contact Doug Mutter of OEA at 907/271-5011.

Thank you for your views on fox eradication in the AMNWR. If you have additional questions about fox eradication or restitution planning, please contact Karen Oakley in the Office of the Oil Spill at 907/786-3579.

Sincerely,



Regional Director

Enclosure

cc:  
C. McVee