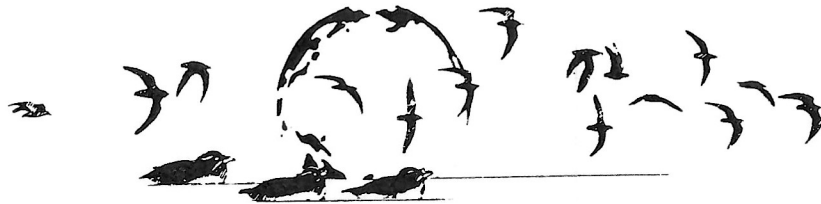

Pacific Seabird Group



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

Craig S. Harrison
Vice Chairman for Conservation
3731 North 6th Road
Arlington, Virginia 22203

March 6, 1992

Mr. Walter O. Stieglitz, Regional Director
U.S. Fish & Wildlife Service
1011 East Tudor Road
Anchorage, Alaska 99503

**Re: Removal of Alien Predators to Restore Seabird
Colonies in Alaska to their Natural Condition**

Dear Mr. Stieglitz:

I am writing on behalf of the Pacific Seabird Group (PSG) to highlight an extremely important seabird conservation issue in Alaska — the removal of alien predators from seabird colonies. We understand that the Alaskan Maritime National Wildlife Refuge has cancelled a project to remove introduced predators from several refuge islands that had been scheduled for the 1992 field season. We urge you to reallocate funds so that this important work can proceed. Moreover, we urge the Alaska region to establish a long-term program with a goal of removing alien predators from all seabird colonies and former seabird colonies in Alaska by the year 2000, thereby restoring the natural biodiversity to the breeding islands. We acknowledge that many dedicated FWS biologists and refuge managers have done an excellent, even heroic, job in removing predators from breeding islands in Alaska. This work has proceeded with ad hoc, piece meal efforts and needs strong support from the regional office on a long-term basis.

The Pacific Seabird Group

As you may know, PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. Its members are drawn from the entire Pacific Basin, including Russia, Canada, Japan, China, Mexico, Australia and New Zealand. Among PSG's members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird refuges, and individuals who are interested in marine conservation.

Marine Bird Conservation in Alaska

We recognize that federal funding and media attention with respect to seabirds during recent years has been directed toward driftnet fishing and the transportation of petroleum. These issues are certainly important to the conservation of Pacific seabirds. For example, FWS biologists estimate that the incidental catch of seabirds in the high seas driftnet fisheries in the North Pacific was 416,000 birds in 1990.^{1/} The federal natural resource trustees estimate that the Exxon Valdez disaster killed 350,000-390,000 seabirds.^{2/} This magnitude of mortality is unacceptable, but we must remember that many of the drowned and oiled birds were non-breeders.

As discussed below, predators such as rats and foxes depress the breeding population of seabirds on the Alaskan Maritime National Wildlife Refuge by several million each year. It is universally accepted among seabird biologists that a population is harmed more by the killing of breeding birds than non-breeding birds.^{3/} While regulating certain types of fishing and oil transportation, FWS should not ignore establishing a program to restore seabird colonies (or former colonies) to their natural condition. Rats and foxes do as much harm to Alaskan seabirds each year as several Exxon Valdez oil spills. While an oil spill wreaks most of its havoc on seabirds in a single year, alien predators depress seabird populations year after year until they are removed.

^{1/} Douglas Johnson, Terry Shaffer and Patrick Gould. Incidental Catch of Marine Birds in High Seas Driftnets of the North Pacific. International North Pacific Fisheries Commission Symposium, Tokyo (November 1991).

^{2/} 56 Fed. Reg. 14691 (1991).

^{3/} Most seabirds do not breed until they are several years old. See, e.g., N. P. Ashmole, Sea Bird Ecology and the Marine Environment. Pp. 223-287 in D.S. Farner and J.R. King, eds., Avian Biology, Vol.I. Academic Press, N.Y.

How Many Seabirds Are Lost Each Year to Predators?

Because FWS has eliminated predators from some breeding islands, we can estimate the increase in the population of seabirds that has occurred once predators such as rats and foxes have been removed. After Kaligagan Island was stocked with foxes in 1921, its seabird population plunged so low that the renowned Alaska naturalist Olaus Murie recommended that it continue as a fox farm. In the 1980s, after foxes had died out, Kaligagan had 125,000 burrowing seabirds.^{4/} FWS biologists recently described dramatic increases in bird populations after foxes were removed from Nizki-Alaid Island in the western Aleutians.^{5/} They found particularly impressive increases for loons, pelagic cormorant, Aleutian green-winged teal, common eider, glaucous-winged gull and tufted puffin. At a 600 hectare island off Newfoundland, twelve foxes consumed 31,000 Leach's storm-petrels in one breeding season.^{6/} There can be no doubt that alien predators devastate seabird colonies.

We understand that fox or rats occur on at least 59 islands in the Alaska Maritime National Wildlife Refuge. Arctic and red fox were introduced for commercial fox farming and still occur on at least 48 islands in the Alaska Maritime National Wildlife Refuge (private owners hold portions of 27 of these islands). Rats occur on at least 18 islands in the refuge, 7 of which also have fox. We cannot estimate with any precision the increase in population if the island ecosystems in the Alaska Maritime National Wildlife Refuge were restored to their natural, predator-free condition. We believe that increases per island would range from 10,000 to 150,000 birds. It is possible that a few decades following predator removal a colony of one million or more birds might be reestablished. Accordingly, alien predators on the Alaska Maritime National Wildlife Refuge depress seabird populations in the order of one to ten Exxon Valdez oil spills.

^{4/} D.R. Nyswander et al. 1982. Marine bird and mammal survey of the eastern Aleutian Islands, summers of 1980-81. Unpublished FWS report.

^{5/} G. Vernon Byrd and Edgar P. Bailey, Response of Aleutian Birds to Removal of Introduced Fox. Alaska Bird Conference (November 1991).

^{6/} B.O. Skepkovych. 1986. A predatory behavior and impact of red foxes (Vulpes vulpes) on the seabird colonies of Baccalieu Island, Newfoundland. M.S. Thesis, Memorial University of Newfoundland, St. Johns.

Federal Treaty Obligations

The United States Government has entered into treaties that require it to make a good faith effort to remove predators from island ecosystems such as those in the Aleutian Islands and islands off the Alaska Peninsula. Article VI(c) of the U.S.-Japan Migratory Bird Treaty requires the USA to endeavor to take measures "to control the introduction of live animals and plants which could disturb the ecological balance of unique island environments."^{1/} Article IV(1) of the U.S.-U.S.S.R. treaty requires the USA to "enhance the environment of migratory birds" and to "abate" "detrimental alteration of that environment."^{2/} As noted above, many Alaskan islands have introduced animals that are detrimental to the environment and should be controlled. The federal government is negotiating with Russia concerning the establishment of international parks and refuges adjacent to the Bering Sea that would be jointly managed. We would hope that fulfilling international commitments made by the federal government in 1972 and 1976 in its migratory bird treaties with Russia and Japan would rank at least as high in regional priorities as any new international commitments that are under consideration.

FWS Region 1 implemented the spirit of the U.S.- Japan and U.S.- U.S.S.R. treaties when it adopted the enclosed Regional Marine Bird Policy. The policy of FWS within Region 1 is to "remove all introduced predators from marine bird colonies on all National Wildlife Refuges and encourage their removal from all other colonies." We urge Region 7 to adopt and implement a similar policy.

Conclusion

PSG is in the process of establishing a long-term program to assist federal, state and private land managers in recognizing and addressing the problems of alien predators on present and former seabird colonies. PSG intends to identify the highest priority islands where rats, foxes and other introduced organisms should be removed throughout the North Pacific. PSG will consider working with federal agencies to take the necessary steps to allow the use of pesticides for this purpose, even those that may currently be banned. Finally, PSG's international network of

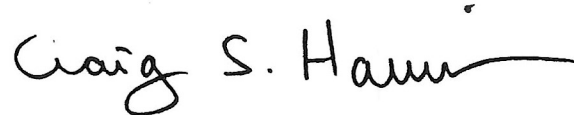
^{1/} Convention for the Protection of Migratory Birds and Birds in Danger of Extinction and Their Environment, Mar. 4, 1972, Japan-USA, 265 UST 3329, TIAS 7990.

^{2/} Convention Concerning the Conservation of Migratory Birds and Their Environment, Nov. 19, 1976, USA-Russia, TIAS 9073; 1134 UNTS 97.

biologists throughout the Pacific Basin may be valuable in facilitating technical assistance.

We look forward to working with you and your staff in developing and implementing a program designed to remove alien predators from seabird colonies. In the mean time, we urge you to restore the funds necessary to allow the Alaskan Maritime National Wildlife Refuge to remove alien predators from refuge islands during the 1992 field season.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive style with a long horizontal flourish at the end.

Craig S. Harrison

Enclosure

cc Senator Ted Stevens
Senator Frank H. Murkowski
Congressman Don Young
Congressman Gerry Studds
Congressman Sidney R. Yates
Secretary Manuel Lujan

REGIONAL MARINE BIRD POLICY

1. BIOLOGICAL AND HISTORICAL PERSPECTIVE

Marine birds have been one of the more neglected natural resources of the world. Although knowledge of these birds is significantly less than for most other avifauna, hundreds of millions are known to exist in and depend on large geographical areas in the Pacific Basin. They are an international resource, and their protection and management depends to a great extent on international treaties and cooperation. The responsibilities and authorities of the U.S. Fish and Wildlife Service for protection and management of marine birds in the Pacific Basin are based on Migratory Bird treaties with Canada, Mexico, Japan, and the Soviet Union and several pertinent acts of Congress. These responsibilities pertain to all lands, not just refuge lands; and to all divisions and programs of the Service, not just Refuge Management.

Marine birds have distinctive characteristics which make management and protection difficult. Most are long-lived and have deferred maturity and low reproductive rates which indicates that extended periods would be necessary for recovery from severe population reductions. They are highly vulnerable to catastrophic losses since entire populations are often concentrated on islands during the crucial breeding season. Large marine bird concentrations also occur in areas heavily used by humans such as the continental shelf and fishing grounds and are thereby vulnerable to severe impacts. The most important threats to these concentrations of marine birds are oceanic pollution especially from extraction and transportation of petroleum and other minerals, human disturbance, introduced predators and human competition for the fishery resource.

II. POLICY

It is the policy of the U. S. fish and wildlife Service within Region 1 to:

1. Implement to the fullest extent possible those Migratory Bird Treaty provisions dealing specifically with marine birds, especially those within the recent Japanese and Soviet Union treaties.

These treaties include the following articles:

- 1) Prohibit the taking of birds or eggs;
- 2) Endeavor to establish sanctuaries;
- 3) Take appropriate measures to preserve and enhance the environment of birds;
- 4) Exchange data regarding research and cooperative research programs; and
- 5) Provide special protections to species or subspecies, which

Within Region 1 the treaties and associated acts (i.e. NEPA) give us authority to prevent or mitigate destruction of habitat through land development, pollution or human disturbance. We are also charged to prevent illegal taking of birds or eggs and introduction of plants or animals that may degrade habitat or directly affect populations.

2. Maintain all marine birds occurring on National Wildlife Refuge lands and waters at not less than current population levels, in their natural diversity and on native habitat throughout their range.
3. Utilize all available programs and divisions of the Fish and Wildlife Service to influence the maintenance of the population and habitat conditions in No. 2 above on all non-Service lands, especially other federally owned lands.
4. Recognize that most marine bird colonies, roosts and loafing sites are important to their survival and work toward the establishment and active protection of these habitats and their adjacent waters as marine bird sanctuaries by private, local, state or Federal interests.
5. Encourage formulation of comprehensive land management plans, effective regulation of offshore oil and mineral development and stringent tanker safety laws - to provide adequate protection for marine birds and their habitats in areas which may be developed.
6. Encourage appropriate research and surveys on marine birds and their ecosystems especially work related to long-term monitoring of populations and habitats and identifying species nearing threatened status.
7. Remove all introduced predators from marine bird colonies on all National Wildlife Refuges and encourage their removal from all other colonies.

III. NATIONAL WILDLIFE REFUGE LANDS

The following is a listing of National Wildlife Refuges within Region One established primarily for marine bird uses or having significant marine bird use in addition to its primary reason for refuge designation.

Washington:

1. Copalis National Wildlife Refuge
2. Quillayute Needles National Wildlife Refuge
3. Flattery Rocks National Wildlife Refuge
4. San Juan Islands National Wildlife Refuge
5. Willapa National Wildlife Refuge
6. Protection Island National Wildlife Refuge

Oregon:

1. Oregon Islands National Wildlife Refuge
2. Three Arch Rocks National Wildlife Refuge
3. Cape Meares National Wildlife Refuge

California:

1. Humboldt Bay National Wildlife Refuge
2. San Francisco Bay National Wildlife Refuge
3. Farallon National Wildlife Refuge

Hawaii:

1. Hawaiian Islands National Wildlife Refuge
2. Kilauea Point National Wildlife Refuge

American Samoa:

1. Rose Atoll National Wildlife Refuge

U.S. Possessions in the Pacific:

1. Johnston Atoll National Wildlife Refuge
2. Baker Island National Wildlife Refuge
3. Howland Island National Wildlife Refuge
4. Jarvis Island National Wildlife Refuge



Regional Director

November 15, 1985

Date