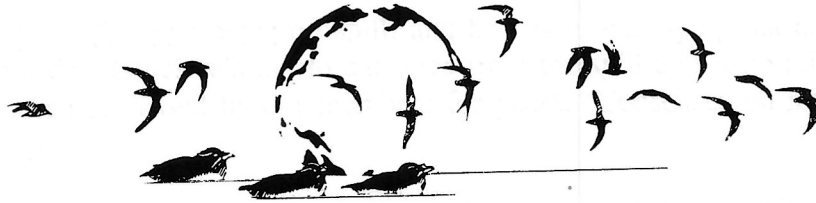

Pacific Seabird Group



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

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

August 6, 1993

BY FAX (hard copy to follow)

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

Re: Comments on April 1993 "Restoration Plan"

Dear Dr. Gibbons:

This letter contains the Pacific Seabird Group's (PSG) comments on a document entitled "draft restoration plan" dated April 1993. PSG expected to receive a draft environmental impact statement (DEIS) that would contain the details of the Trustee Council's proposed restoration plan. By letter dated June 21, 1993, we learned that the DEIS is not yet available. PSG's primary interest at this time is to comment on a DEIS, but we reiterate here our ideas concerning the draft restoration plan that we have submitted to the EVOS Trustee Council during the past two years. PSG recognizes the enormity of the Trustee Council's task in formulating a restoration plan, but urge it to make some hard decisions soon. PSG believes that there is ample scientific evidence and public consensus to proceed with some programs, including predator removal. PSG will object if the 1994 field season is funded in the absence of a final restoration 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 affected by the Exxon Valdez oil spill, and has sponsored symposia on the effects of the spill on seabirds. Issues relating to damages from the spill and restoration of seabird populations have been discussed by our members for years. Consensus on many issues was reached long ago.

For example, we have previously observed that the best means to restore Alaska's seabird populations would be to remove rats, foxes and other alien creatures from colonies and former colonies. We stand by this opinion. We hope that, as we requested by letter dated November 20, 1992, the U.S. Fish & Wildlife Service will soon submit to PSG for comment a multi-year plan that outlines a comprehensive approach to removing all exotic predators from seabird islands in Alaska within five years.

PSG supports habitat acquisition. Our March 19, 1993 testimony to the House Committee on Merchant Marine and Fisheries concerning the restoration of Prince William Sound (copy enclosed) identified the islands that should be purchased. The Trustee Council solicits comment on whether 35%, 50%, 75% or 91% is an appropriate percentage of funds that should be spent to purchase habitat. There is insufficient information in the April 1993 document to consider intelligently the trade-offs that these funding levels would entail. For example, would the 91% level preclude endowing chairs in marine ornithology? Would the 75% level preclude a comprehensive predator control program? PSG objects to setting funding levels at this time.

As stated in our letter to the Trustee Council dated April 14, 1993, PSG supports the endowment of chairs in marine ornithology at the University of Alaska as an appropriate use of some of the Exxon Valdez settlement funds. This use is justified under the enhancement provisions in the settlement documents. Endowed chairs can provide independent (non-government) research, expertise for contract studies, public education and a source of well-trained scientists to advise or be employed by the responsible agencies.

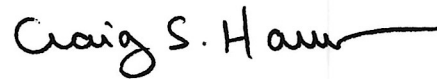
Most birds killed in the spill were migratory. PSG reiterates its strong objection to limiting seabird restoration to the geographic area that the Trustee Council has identified as the spill area. The Trustee Council has spent too much effort attempting to restore seabird colonies at infeasible sites within the spill area instead of planning for compensatory restoration in breeding areas that may be far from the spill area.

Finally, according to federal estimates published in 56 Federal Register 14687 (April 11, 1991), the government processed the following numbers of oiled birds: common murre (10,428 plus some of the 8,851 unidentified murre), harlequin ducks (213), marbled murrelets (612 plus some of the 413 unidentified murrelets), pigeon guillemots (614) and black oystercatchers (9). PSG is concerned that the Trustee Council seems to limit restoration to species that account for about 21,000 of the 35,000 birds that were processed. Restoration should include the species that account for the other 14,000 dead birds (the actual number of dead birds being an unknown multiple of 14,000). As a reference point for this magnitude of injury to seabirds, the federal government is currently pursuing a major law suit in central California concerning a spill that it alleges oiled or damaged about 4,200 seabirds. The Trustee Council should include in its restoration plan the damaged species it

now seems to ignore, including yellow-billed loons, tufted puffins, grebes, shearwaters, cormorants, oldsquaw, scoters, black-legged kittiwakes and ancient murrelets.

In conclusion, PSG urges the Trustees to (1) fund the removal of predators from seabird colonies; (2) purchase seabird habitat; (3) endow university chairs; (4) expand restoration for migratory birds to include the entire state of Alaska; and (5) include all damaged species of seabirds in its restoration efforts.

Sincerely,

A handwritten signature in cursive script that reads "Craig S. Harrison". The signature is written in dark ink and includes a long horizontal flourish at the end.

Craig S. Harrison

Enclosure