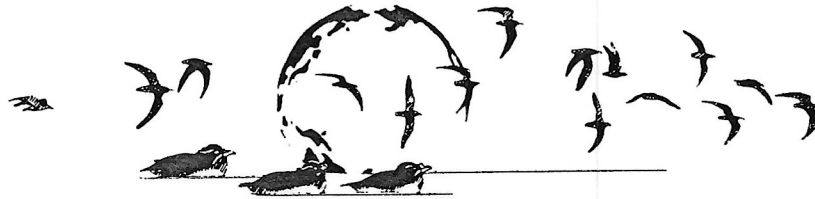

Pacific Seabird Group



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

January 21, 1994

James Ayers, Executive Director
Exxon Valdez Oil Trustee Council
645 G Street
Anchorage, Alaska 99501

Re: Comments on Draft 1994 Work Plan

Dear Mr. Ayers:

This letter contains the Pacific Seabird Group's (PSG) comments on the draft 1994 Work Plan (December 1993). 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 populations and 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.

PSG cannot meet the January 14, 1994 deadline for comment. PSG's chair George Divoky did not receive the draft 1994 Work Plan until January 10, 1994, and I received it a few days later. PSG wants to remain actively involved with the restoration process and to share its experience regarding the biology and management of seabirds, but we cannot function effectively when the Trustee Council gives us only a few days to review a lengthy work plan that involves complicated issues. Moreover, extremely short deadlines cause us to truncate our internal review process.

I. Project 94041 (Removal of Introduced Predators)

The removal of introduced predators is PSG's highest priority in the 1994 Work Plan. The Canadian Wildlife Service has taken an approach similar to this project and is using 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 suggested for several years 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. This project would begin this task by focusing on Chernabura and Simeonof Islands, which are close to what the Trustee Council defines to be the oil spill area.^{1/} We agree that this project will greatly benefit local populations of common murre, black oystercatchers, pigeon guillemots and other species, including some not injured by the oil spill.

We disagree with the Trustee Council's statement that "it is not known whether the birds that nest on these islands migrate into the spill area." Virtually all the bird species killed in the spill are migratory birds. While we may not be able to produce an oiled bird that was banded on Chernabura or Simeonof Islands, it seems highly unlikely that common murre throughout their range in the Gulf of Alaska and the Aleutian Islands are not genetically linked. Indeed, banding studies of alcids indicate that substantial numbers of young birds prospect for breeding sites long distances from their natal colony, often at much greater distances than the distance from the Shumagin Islands to Prince William Sound. Colonies outside the Trustee Council's definition of the oil spill area are a source of birds that can and will recolonize damaged colonies. PSG objects to the Trustee Council using a highly questionable assumption as a means to limit the restoration of seabirds.

PSG hopes that the Trustee Council will expand its list of injured seabirds. According to the 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). The Trustee Council often seems to limit restoration of seabirds to the five 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).^{2/} This project will help restore

^{1/} 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 areas that may be far from the spill area.

^{2/} As a reference point for this magnitude of injury to seabirds, the federal government is currently pursuing a major law suit involving the Apex Houston in central California concerning a spill that it alleges oiled or damaged about 4,200 seabirds (the actual number being an unknown multiple of 4,200).

many of the damaged species that the Trustee Council has ignored, including tufted puffins, cormorants, black-legged kittiwakes and ancient murrelets.

II. Work on Damaged Seabirds that Are Not Recovering

PSG supports continued work on estimating the distribution and abundance of seabirds in Prince William Sound during spring and summer (Project 94159). We suggest that this work be expanded to include the entire spill area. PSG generally supports projects that focus on birds that apparently are not recovering, including black oystercatchers (Project 94020), common murres (Projects 94039 and 94040), harlequin ducks (Project 94066), marbled murrelets (94102), and pigeon guillemots (Projects 94506 and 94173). Because bird populations may be depressed due to disruptions in food supplies, we support the study for forage fish influence on injured species (Project 94163).

Finally, this seems an appropriate occasion for the Trustee Council to answer several questions that it posed in its requests for comment on restoration in 1992. Are federal and state agencies using their regulatory powers to modify human uses of resources or habitats that the spill injured? We noted in June 1992 that such efforts would not exhaust any of the restoration trust fund but would merely require that the state and federal natural resource agencies enforce the laws or redirect their programs. Have agencies curtailed the hunting seasons for sea ducks or harlequin ducks? What has been done to manage commercial fisheries to reduce the incidental mortality of marbled murrelets in drift gillnets (a violation of the Migratory Bird Treaty Act)? Has logging (both on government and private lands) been curtailed in uplands that are prime habitat for marbled murrelets or harlequin ducks?

PSG thanks the Trustee Council for this opportunity to lend its expertise and views on these important issues.

Sincerely,