

# Pacific Seabird Group



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

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Department of Game  
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Bothell, WA 98012

Pam Wilson  
Alaska Maritime NWR Planning Team  
1011 E. Tudor Rd.  
Anchorage, AK 99503

Dear Ms. Wilson:

On behalf of the Pacific Seabird Group (PSG), I would like to take this opportunity to provide our organization's comments on the proposed Alaska Maritime NWR refuge plan. The PSG is a scientific society composed of seabird researchers and conservationists dedicated to the study and conservation of Pacific seabirds. With respect to the refuge plan we would ask that the following points be considered:

- 1) The AMNWR provides nesting habitat for about 40,000,000 seabirds, many times the number of seabirds nesting in the continental United States. The need to monitor populations of all major seabird species throughout their ranges is emphasized by recent declines in some species (e.g., Black-legged Kittiwake, Red-legged Kittiwake, Common Murre, Thick-billed Murre, Horned Puffin), and existing problems of commercial fisheries conflicts, waterborne pollutants, and oil spills. In addition, historic population levels of seabirds should be restored through the continued effort to eliminate introduced predators from seabird nesting areas.
- 2) The AMNWR should take an active role in providing refuge visitors with outstanding seabird viewing and educational opportunities. Visitor access to the AMNWR should be encouraged and enhanced at selected colonies with exceptional interpretive potential and where human disturbance can be minimized. High quality visitor centers, displays, films, and literature should be developed for public use. At some sites the visitor experience should be enhanced by building blinds to view and photograph seabirds and marine mammals. We feel that only through an aggressive public involvement and education program can the AMNWR provide effective longterm protection of seabird populations.

3) Section 303.(1)(B)(i and iv) of ANILCA gives the FWS a legal mandate to conserve marine birds and the marine resources upon which they rely and to provide a program of national and international scientific research on marine resources. Therefore, it is imperative that the refuge plan address the need for FWS to learn about quantitative interactions between fisheries and fish-eating seabirds. The FWS could be sued if measures are not taken to assure an adequate food supply for fish-eating birds.

4) Marine birds that breed on the AMNWR depend on the ocean for their food. Given that the FWS knows virtually nothing about subtidal seabird habitats (and therefore knows nothing about conservation/protection measures needed for same), the refuge plan needs to address the definition, characterization, location and protection of these areas.

5) A significant amount of the seabird nesting habitat on the AMNWR has been conveyed to the Alaska native corporations under the Alaska Native Claims Settlement Act. Approximately 80% of these areas are located on islands south of the Alaska Peninsula and in the eastern Aleutian Islands. The plan should address the need to acquire these and other inholdings through land exchange, purchase of fee title, or purchase of conservation easements. Included in the plan should be a list of all privately owned lands on the AMNWR that should be acquired by the FWS or otherwise afforded additional management protection.

6) Seabirds occupy refuge lands only during 3 to 4 months a year. The remainder of the time they are physically outside the legal boundaries of the AMNWR. For the most part, the threats to seabirds are most severe during the time that birds are off refuge lands. It is not enough that the refuge protect their islands and assume their job is finished. The AMNWR CCP needs to recognize these limitations and address the broader issues of seabird management, whether it is oceanic distribution and abundance of seabirds, fisheries-seabird interactions, or shearwater harvest in New Zealand. It is critical that the AMNWR not take a narrow "real estate" oriented approach to seabird management.

We appreciate this opportunity to comment on the proposed AMNWR CCP and look forward to reviewing the draft management plan.

Sincerely,

Lora L. Leschner  
Chair, Pacific Seabird Group