

Pacific Seabird Group



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

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Will Meeks, Deputy Refuge Manager
Alaska Maritime National Wildlife Refuge
95 Sterling Highway, Suite 1
Homer, AK 99603

Re: Environmental Assessment for Restoring Wildlife Habitat on Rat Island

Dear Mr. Meeks:

On behalf of the Pacific Seabird Group (PSG) we offer our views on the Environmental Assessment for Restoring Wildlife Habitat on Rat Island. PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Peru, Chile, Russia, Japan, South Korea, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. Since its inception PSG has been a strong and vocal advocate of removing invasive species throughout the Pacific region, especially in the Alaskan Maritime National Wildlife Refuge. PSG recently honored G. Vernon Byrd with a Lifetime Achievement Award in part for his work on controlling invasive mammals. PSG members are some of the world's experts in island restoration, and many of our members have worked on seabirds in Alaska.

PSG strongly supports your proposal to eliminate Norway Rats (*Rattus norvegicus*) from Rat Island. Seabird islands throughout the world have been threatened by introduced predators, and rats are one of the most pernicious pests that can occupy a seabird colony. In the worst circumstances, a seabird colony can be entirely destroyed; in other situations a colony can be crippled, suffering huge losses each year of eggs, chicks and even adult birds. Such changes disturb the entire island ecosystem. Rat Island was apparently named because of the rats that were inadvertently introduced to the island after a shipwreck more than 200 years ago. Today this island of almost 7,000 acres today has few seabirds. The Aleutian Islands are a globally significant seabird resource, and

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support 26 species of breeding seabirds with a population of as many as 40 million. We can only guess as to the species and populations that could occupy this island once rats are removed, but the existence of rats on Rat Island could be depressing the population of seabirds **each year** by an amount equivalent to the loss of seabirds from the *Exxon Valdez* oil spill. Nearby islands that are rat-free have abundant populations of seabirds, and we are confident that natural restoration will occur once the Norway rats have been removed.

We believe that a fundamental mission of the National Wildlife Refuge System is to restore islands such as Rat Island to their natural state, and to allow wildlife such as seabirds to flourish there. For decades, the Alaska Maritime National Wildlife Refuge has been a national and world leader in restoring island ecosystems to benefit seabirds. We have confidence that the refuge will capably and professionally implement the proposed rat removal program. The second-generation anticoagulant brodifacoum has successfully been used to eliminate alien rodents for twenty years. The technique of scattering poisoned bait from a helicopter was developed by New Zealand conservationists and was first successfully employed in the United States in 2002 in a project that eradicated rats on Anacapa Island in the Channel Islands National Park. PSG supported that eradication, and many PSG members were involved in implementing and monitoring that project. The Anacapa project has resulted in spectacular recovery of the target species, the Xantus's Murrelet.

For all of these reasons, we believe that the proposed techniques are proven and that this project can be a success. This technique is preferable to alternative rodenticides, and the aerial approach will minimize adverse environmental impacts by reducing disturbance to soil and vegetation from servicing bait stations on foot. Please contact us if we can be of further assistance in implementing this project.

Sincerely,

/s/ Craig S. Harrison

Craig S. Harrison
Vice Chair for Conservation