

Pacific Seabird Group



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

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June 13, 2008

Ms. Jane Hendron
U.S. Fish and Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA, 9201

Re: Environmental Assessment for San Nicolas Island Seabird Restoration Project

Dear Ms. Hendron:

The Pacific Seabird Group (PSG) is an international, non-profit organization founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has an international membership drawn from the entire Pacific basin, including China, Canada, Mexico, Russia, Japan, Australia, New Zealand, and the United States as well as a substantial membership in Europe. Among PSG's members are scientists interested in seabird biology and conservation, managers of wildlife refuges, parks, and natural areas, and other individuals interested in marine conservation. Since its inception PSG has been a strong and vocal advocate of removing invasive species throughout the Pacific region. On May 20, 2005, PSG wrote to Greg Baker, Program Manager, Montrose Settlements Restoration Program, in support of eleven projects that are intended to restore seabirds as part of the settlement of claims for damages to seabirds related to the dumping of DDTs and PCBs into Southern California coastal waters. Among the projects that PSG endorsed was the eradication of feral cats from San Nicolas Island.

PSG wishes to reiterate its strong support of the proposal to eradicate feral cats on San Nicolas Island. Seabird islands throughout the world have been devastated by introduced predators, and cats are one of the most pernicious pests that can occupy a seabird colony. Seabirds have not evolved responses for dealing with cats. In a seminal review of the effects of introduced predators on seabird colonies, P.J. Moors and I.A.E. Atkinson (*Predation on Seabirds By Introduced Animals, and Factors Affecting its Severity, in Status and Conservation of the World's Seabirds*, Cambridge, International Council for Bird Preservation, 1984) wrote that "No other alien predator has had such a universally damaging effect." Feral cats drove the Guadalupe storm-petrel

Ms. Jane Hendron
June 17, 2008

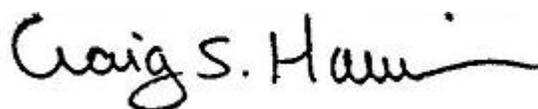
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(*Oceanodroma macrodactyla*) to extinction on nearby islands in Mexico. Conservationists working in the field of island restoration have removed feral cats from 75 or more islands, including New Zealand's network of offshore island bird reserves and Australia's Macquarie Island. On Ascension Island in the Atlantic, cats were introduced in the 19th century and caused a collapse in populations of nesting seabirds. The project to remove them from Ascension began in 2002, and the island was cleared of feral cats by 2004. This allowed seven species of seabirds which had not nested on the island for a century to return. A few years ago, PSG awarded a Special Achievement Award to Mark J. Rauzon for his work in removing cats from Jarvis National Wildlife Refuge. Within a few years of the removal of feral cats, four species of tropical birds returned to reestablish colonies there. In the case of San Nicolas Island, cats are causing losses of western gulls, Brandt's cormorants, the endangered western snowy plover, and possibly the endangered brown pelican. This type of on-going loss can be worse than losses from an oil spill, which are usually confined to a single year or perhaps a series of a few years rather than losses in perpetuity while the feral cats remain on a breeding colony and devastate or destroy it. We also note that Executive Order 13112, 64 Fed. Reg. 6183-66 (Feb 8, 1999), requires federal agencies to manage invasive species such as cats.

We believe that the plan of hunting, trapping and using adaptive management to eradicate the cats will be successful and can be done with reasonable economy. Similar projects in Mexico have been successful. The trapping and euthanasia are proposed to be implemented in a humane manner. We do not believe that any program of trap, neuter and release would be effective, because it allows altered feral cats to continue killing native species and would make complete removal nearly impossible, leaving some unaltered feral cats to reestablish a colony. This would ultimately represent the squandering of precious restoration funds. The only solution to solving this problem and restoring the seabird populations is the complete removal of the feral cats.

For all of these reasons, we endorse the proposed project and believe that it will be a success. Please contact us if we can be of further assistance in implementing this project.

Sincerely,

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

Craig S. Harrison
Vice Chair for Conservation