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prbo

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Winnie Chan  
San Francisco Bay NWR Complex  
9500 Thornton Avenue  
Newark, CA 94560

Dear Ms. Chan,

We are writing on behalf of PRBO Conservation Science (PRBO) to comment on the Farallon National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Assessment (CCP). PRBO is an independent, scientific research non-profit which has been conducting research on and helping to steward the refuge's unique natural resources every day and night since 1968, in partnership with the United States Fish and Wildlife Service (USFWS). PRBO's mission is to conserve wildlife and ecosystems through innovative scientific research and outreach.

With over 40 years of continuous work on the Farallones, PRBO and partners have produced hundreds of scientific publications and made valuable scientific contributions to address management challenges including human disturbance, fishing bycatch, oil pollution, and establishing state marine protected areas. With our knowledge of the ecology and wildlife of the Farallones, we present in this letter some feedback on the CCP to help improve management of the refuge and ensure effective conservation of the wildlife that depends upon it. PRBO strongly supports most of the goals of this excellent and comprehensive management plan. Specifically, we endorse Alternative B and oppose plans for opening the refuge to public access, as suggested in Preferred Alternative C.

This CCP thoroughly and accurately describes the refuge, its resources, ongoing research and education programs, and current management approaches as well as alternatives for future management. PRBO strongly supports the management goals of wildlife protection and monitoring, habitat restoration, and education and outreach (Chapter 5). In particular, we are pleased to see the prioritization of ecosystem scale research that includes studies on foraging ecology, marine food webs, and climate change.

We recommend that the suggestion under Wildlife Management in Alternative C to "permit/encourage on island research focused on broad ecosystem questions that support the conservation of refuge wildlife" be added to Alternative B as well. Also, we wish to note that the proposed funds laid out in Chapter 5, Table 9 for Ashy Storm Petrel population assessment are much needed for this species of conservation concern.

Objective 2.3, to continue to implement and annually update the refuge's weed management plan, is essential to effectively address the impacts of non-native vegetation on Southeast Farallon Island. This plan should be based on ecological data to identify priority goals for managing invasive plants, taking into consideration wildlife impacts of different strategies.

PRBO has a major concern with the portion of Alternative C suggesting assessment of on-site wildlife dependent recreation, including guided tours. While we strongly support ongoing volunteer activities that meet refuge management goals of public education and conservation, opening the refuge to public tours and recreation could put one of our country's greatest natural treasures at risk by threatening sensitive wildlife populations with excessive human disturbance. Such activity may also pose serious risks to the visitors due to the dangerous conditions for landing on the island. Finally, the costs would be prohibitive, especially in light of the ongoing struggle to fund basic refuge stewardship and necessary research for effective wildlife management.

The Farallon Islands host the largest number of breeding seabirds at a single colony in the contiguous United States. The refuge is also an important breeding and haul out site for 5 species of pinnipeds. Seabird and marine mammal populations on the Farallones are extremely sensitive to disturbance as they have evolved in the absence of predators. Most of these species have suffered some decline due to human disturbance over the past century and more.

Even unintentional human disturbance of breeding seabirds can facilitate predation by other avian predators and reduce reproductive success. Sensitive habitats, such as burrows for cavity nesting seabirds, are extremely vulnerable to trampling by increased visitation. Increased public access could also result in the introduction of non-native species that directly threaten native species.

Furthermore, over the past four years some seabirds on the Farallones have shown poor breeding in response to recent climate variability. With the occurrence of climate extremes likely to grow in the years ahead, the federal government's U.S. Climate Change Science Program ([www.climatechange.gov](http://www.climatechange.gov)) is recommending a number of management actions for natural resource management including the reduction of stressors on sensitive species. Allowing public tours and wildlife-dependent recreation would likely increase stressors significantly.

In addition, human access to the Farallones is very dangerous and island resources can not support traditional visitor services. The combination of unsafe landing conditions and difficult weather create significant potential liability with increased human traffic to and from the island. The only access methods to the island involve lifting by crane and intertidal landing making logistics extremely difficult and costly to accommodate increased access for public tours. Safe and effective landings at the Farallones require extensively trained and experienced personnel. Further, fresh water, toilets, and trash are already a severely limiting factor for island personnel.

The Farallones have a long history of human disturbance, including wide scale hunting, eggging, harassment of wildlife, and introduction of non-native predators. This human disturbance threatened and reduced Farallon wildlife populations until the USFWS and PRBO took steps to significantly reduce human impacts to the islands and their resources. Actions included establishing biologically sensitive closed areas, controlling or eliminating introduced species, reducing impacts of research on sensitive areas, placing limitations on the numbers of island personnel, and educating the public about the impacts of disturbance to the island. The result has

been positive. Over 300,000 seabirds now thrive on the island and Northern Elephant Seals have recovered from the days of hunting and increased human activity. Over the last decade, Northern Fur Seals have re-established only the second breeding colony for their species south of Alaska. Several species of endangered birds and mammals breed on the island and research is conducted at a level that supports wildlife populations and can be sustained by the resources on the island.

The enormous public outcry in opposition to the 2005 proposed federal legislation that might have opened the Farallon National Wildlife Refuge to unfettered public access is instructive. Distinct from PRBO's concerns, we believe there is a vocal majority that would strenuously oppose any efforts to open this national treasure to public tours and wildlife-dependent recreation.

Finally, the USFWS provides up to one third of the costs of the annual stewardship and research activities at the refuge. PRBO secures the remaining funds each year. Together, we struggle to provide the minimum annual funding required for our basic stewardship and research. Adding supplementary responsibilities and staffing for public tours and wildlife-dependent recreation could be cost-prohibitive.

PRBO shares stewardship of this vital remote wildlife habitat and we are very sensitive to the potential effects that excessive human disturbance can have on this system. As a result, PRBO cannot support the Preferred Alternative C as currently written and endorses Alternative B.

As mentioned above, we wholeheartedly support soliciting greater public involvement through ongoing volunteer activities that enhance the goals of the refuge and benefit the conservation of its sensitive and unique wildlife populations. These volunteer activities also meet the stated management goal, which applies to all alternatives, of "wildlife dependent recreation and environmental education while preserving and enhancing wildlife populations and the wilderness character of the refuge." In such cases, volunteers from the general public can apply and be screened in order to participate. Volunteers must demonstrate their desire to further the goals of the refuge as well as their ability to work under potentially strenuous conditions.

We believe that the refuge's general public outreach goals can be met through more educational activities with visitors to the waters adjacent to the island, remote visitors via Internet web camera projects and new programs currently in development. These activities would allow a limitless public connection to the Farallon National Wildlife Refuge.

We are happy to provide further details if requested. As always, all of us at PRBO greatly value our strong partnership with the USFWS. We look forward to working with you to implement the final plan. Thank you for this opportunity to comment.

Sincerely,



Russell Bradley, M.Sc.  
Farallon Program Manager



Ellie M. Cohen  
Executive Director

Cc: Mendel Stewart, Gerry McChesney, US Fish and Wildlife Service  
Jaime Jahncke, Melissa Pitkin, PRBO Conservation Science