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30 November 2009

Steve Delehanty  
Refuge Manager  
Alaska Maritime NWR  
95 Sterling Highway, Suite 1  
MS 505  
Homer, Alaska 99603

**Re: Kasatochi Island Auklet Habitat Restoration Proposal**

Dear Steve,

I am writing on behalf of IMC Shipping Co, PTE Ltd, the Responsible Party for the Selendang Ayu oil spill, to propose a project on Kasatochi Island designed to provide substantial benefits to auklets whose nesting colonies were completely buried as a result of the volcanic eruption there last year. The project would involve the experimental washing of recently deposited volcanic ash from the Thundering Talus portion of the auklet colony at Kasatochi Island, Alaska Maritime NWR, as an evaluation of a possible method for Crested Auklet restoration.

The Selendang Ayu Trustee Council has requested advice on mitigation actions to restore seabirds impacted directly by the Selendang Ayu oil spill of December 8, 2004. Thousands of Crested Auklets are believed to have died as a result of the spill. Improving Crested Auklet breeding habitat is a possible option for restoring natural resources damaged by the spill.

The (former) auklet colony site at Kasatochi was one of only seven significant Crested Auklet colonies in the Aleutian Islands, with many thousands of birds breeding in rock crevices along the northwest and west shores of Kasatochi. As a result of the volcanic eruption in August 2008, virtually all the colony sites at Kasatochi were covered with fine ash, leaving the rock crevice breeding sites used by auklets inaccessible. In 2009 Crested Auklets returned to the former colony site in large numbers but found few or no opportunities for successful breeding, due to their need for crevices. As a result of the philopatric behavior of the birds and limited alternative suitable habitat to Kasatochi, these long-lived birds are now homeless and likely have limited possibilities for nesting elsewhere. Modification of parts of the previous colony site, involving the washing of ash from the underlying talus, could save this important auklet colony from extinction by allowing birds to return and breed successfully.

We are developing an experimental protocol to test the following questions: 1) would high pressure water jets from an adjacent anchored vessel remove ash deposits and restore crevices at the colony site?, 2) would Crested Auklets reoccupy and nest in the restored crevices?, and 3) is ash washing at Kasatochi a feasible method that could be scaled up to mitigate the loss of Crested Auklets in the Selendang Ayu oil spill?

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We propose to use water jets from six inch fire monitors fixed on a vessel anchored adjacent to Thundering Talus (*i.e.*, no mechanized equipment on land or on the refuge) to clear up to two hectares of the colony site during April 2010. We believe this could be accomplished with minimal cost and great benefit to the biota of Kasatochi Island. In addition to Crested Auklets, Least and Whiskered Auklets, and possibly other seabird species, would likely benefit from restoration of crevices, with no significant adverse impacts on other wildlife. Auklets arriving at their colony site next spring would hopefully find experimentally restored crevices and their return and reneating would be measured by us using standard procedures.

Because there is a nearby Stellar Sea Lion rookery, we understand that it may be necessary for the Refuge to consult with the NMFS to obtain an Incidental Harassment Authorization under the Marine Mammal Protection Act. The area to be experimentally modified is not part of the rookery and is separated from the rookery by a steep headland, so anticipated disturbance to sea lions is anticipated to be minimal.

We have discussed this project with Vernon Byrd and Jeff Williams, and we request that you consider our proposal in principle and let us know whether the refuge will support this restoration project. Due to the short time available to authorize this project in time for the work to be completed before the breeding season, we hope that the process can be formally initiated very soon. If the refuge's response is favorable, we will immediately submit a detailed study plan for permitting. Thank you very much for considering this proposal and let me know if you need any additional information or have any questions.

Sincerely,



William T. Everett

Cc: Ian Jones, Memorial University  
Jeff Williams, USFWS  
Bert Ray, Keesal, Young and Logan  
Gary Mauseth, Polaris Applied Sciences