

Pacific Seabird Group



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

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Kevin Ryan
Refuge Manager
Washington Maritime NWR Complex
3 South Barr Road
Port Angeles, WA 98362

Re: Comments on Draft Comprehensive Conservation Plan and Environmental Assessment for Washington Islands Refuges

Dear Mr. Ryan:

On behalf of the Pacific Seabird Group (PSG), we offer the following comments on the Draft Comprehensive Conservation Plan and Environmental Assessment for Washington Islands Refuges (“Conservation Plan”) that was issued in May 2005. We understand that the Conservation Plan affects Flattery Rocks, Quillayute Needles, and Copalis National Wildlife Refuges and is intended to guide the U.S. Fish & Wildlife Service’s management of these three refuges for the next fifteen years. 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. PSG has been involved with the types of issues outlined in the Conservation Plan since PSG’s inception over 30 years ago.

In general, PSG is very supportive of the preferred alternative. We understand that Fork-tailed Storm-Petrels, Leach’s Storm-Petrels, Brandt’s Cormorants, Double-crested Cormorants, Pelagic Cormorants, Western Gulls, Glaucous-winged Gulls, Common Murres, Pigeon Guillemots, Ancient Murrelets, Cassin’s Auklets, Rhinoceros Auklets, and Tufted Puffins breed on these refuge islands. While PSG endorses the following goals in the preferred alternative, it is most supportive of the first and fifth goals:

- Protect migratory birds and other native wildlife and their associated habitats, with special emphasis on seabirds;
- Protect and support the recovery of federally threatened and endangered species and Washington State special status species and their associated habitats;
- Promote and manage the Washington Islands Wilderness Area to maintain its wilderness character and values;
- Through effective coordination and cooperation with others, promote conservation of refuge resources, with special emphasis on governmental agencies and tribes with adjoining ownership and/or jurisdiction;
- Continue and enhance long-term monitoring and sustain applied research; and
- Increase public interpretation and awareness programs to enhance appreciation, understanding, and enjoyment of refuge resources.

PSG has long supported the FWS' Regional Marine Bird Policy that was adopted by the Regional Director on November 15, 1985, especially the policy to "remove all introduced predators from marine bird colonies on all National Wildlife Refuges." In this regard, alien rabbits should be removed from Destruction Island (Quillayute Needles NWR), and any other alien creatures that may have been introduced to any of the refuge islands (especially rodents or carnivores) should also be removed. We agree that oil-spill-response training is very important for refuge staff and other state and federal agencies, but urge you also to include training to contain immediately and remove rodents that might be introduced by shipwrecks. The refuge also should acquire and stock equipment that can be used to contain any rodents that escape from shipwrecks and consider seeking technical assistance on these issues from the Alaska Maritime NWR, Homer, Alaska.

PSG generally agrees that access to the refuge islands should be restricted, especially during the birds' breeding season. If FWS determines that access to some refuge islands will not pose threats to the mission of the refuges, we believe that such access should be open to PSG members and the general public as well, not just members of certain tribes as implied in the Conservation Plan (p. 2-10). The Conservation Plan makes an important point that airplane over-flights and ships containing oil or other products pose significant threats to the health and safety of the wildlife resources on these islands. We urge you to continue to work with the Federal Aviation Administration and NOAA to create legal buffer zones around the islands, and to have these legal restrictions placed on all official navigation charts (e.g., restricted passage closer than 5 or 10 nautical miles) and aeronautical charts (e.g., maintain altitudes of at least 2,000 feet within one mile of a colony) covering these refuges. We appreciate that enforcement is always a problem on remote refuge islands. We understand that the U.S. Navy is working to develop unmanned drones at a reasonable price that might be used in the future to monitor compliance with regulations that forbid landing on the islands or coming too close to them. PSG hopes that refuge staff will make use of such opportunities when they become available.

Finally, we all live in a world where we cannot afford everything that we might wish to have. In terms of setting priorities, we believe that having an excellent web site for the refuge will ultimately provide more and better information to the public at a far smaller cost than will a permanent visitor center. We believe that financially supporting monitoring and applied research on the refuge resources, including full GIS capabilities, will ultimately better serve the conservation of seabirds than will building a new (and surely very expensive) refuge headquarters. We recognize that senators and congressmen are often more willing to fund construction projects (which are supported by the construction industry) than to fund healthy operation budgets. PSG hopes that FWS sets an appropriate tone in its budget requests so that the activities that truly make a difference for seabird conservation and management are the highest priorities.

Thank you for the opportunity to comment on the Conservation Plan. These are important islands for seabird conservation, and we wish you well in managing them. We will gladly provide additional comments or expertise at your request.

Sincerely,

/s/ Craig S. Harrison

Craig S. Harrison
Vice Chair for Conservation