

# Pacific Seabird Group



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

PSG Website: [www.pacificseabirdgroup.org](http://www.pacificseabirdgroup.org)

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21 February 2014

District Engineer  
U.S. Army Corps of Engineer District, Portland  
Attn: CENWP-PM-E/Steve Helm  
P.O. Box 2946, Portland, Oregon 97208-2946

RE: CENWP-PM-E-14-02

Dear District Engineer:

This letter concerns the draft Environmental Assessment - Caspian Tern Nesting Habitat Reduction, East Sand Island, Clatsop County, Oregon. We appreciate the opportunity to provide our comments, and we especially appreciate the 30-day comment period, which is essential for engagement by volunteer organizations, such as the Pacific Seabird Group (PSG). The PSG favors the "no action" alternative at this time.

The 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, Russia, Japan, China, Australia, New Zealand, and the USA. The PSG's members include biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation.

We offer the following brief comments on the draft EA:

While the ultimate objectives of the FCRPS BiOp and EIS/ROD have not been achieved (p. 11 in the EA), the Caspian Tern Plan has been successful in the sense that shifting the primary location of nesting Caspian Terns from Rice Island to East Sand Island has greatly reduced the proportion of juvenile salmonids in the diets of the terns nesting at the largest Caspian Tern colony in the world. However, the Caspian Tern Plan is now out of date: it was developed a decade ago (during the years 2000-2006) and much has been learned since then and much has changed. For example, there have been unanticipated results, such as having so many terns crowding into such a small nesting area. Moreover, it is now evident that several species of birds—including Caspian Terns, Double-crested Cormorants, Brown Pelicans, Bald Eagles and Glaucous/Western gulls—are now directly or indirectly part of the picture. Hence, it is essential that management of avian predation on endangered salmonids must be addressed on an integrated basis. Finally, consideration of avian predation management issues must be addressed at a regional scale, since that is the geographic scale at which the birds themselves live. Hence, any management actions concerning this suite of birds must be addressed at that larger scale.

We are concerned that the Corps is now proposing a nearly one-third reduction in the prime East Sand Island nesting habitat for Caspian Terns, but is apparently abandoning its commitment to match reductions in nesting habitat with creation of alternative nesting habitat at other locations at a 2:1 ratio. We see this commitment as fundamental to the entire Caspian Tern Plan, which resulted from the settlement of litigation by the National Audubon Society and other organizations. It remains to be seen whether the inland habitats created to date will ultimately prove to be successfully used by significant numbers of terns, but early results are not highly encouraging. The Corps' preferred alternative as presented in this EA (p. 13) includes a vague commitment to continue to seek creation of coastal nesting habitat. Such efforts over the last decade have completely failed, and the EA gives no assurances of any prospect of success, especially given the State of Washington's unwillingness to help. It is now wholly inadequate to couple the abandonment of the commitment to compensate for habitat reduction by creating new habitat at a 2:1 ratio with a vague offer to continue to seek creation of coastal habitat.

Finally, the discussion of cumulative effects in this EA is inadequate. For example, the Corps Walla Walla District recently adopted an Inland Avian Predation Management Plan, which will result in the elimination of an important Caspian Tern colony on the Columbia River, yet there is no mention even of that closely related action affecting the same species of bird on the same river system. This underscores the need to address the impacts of management actions directed at avian predators, including Caspian Terns and other species, on an integrated basis at a regional scale. A second example, concerns

the Streaked Horned Lark. The EA (p. 13) mentions the presence of this subspecies on some of the islands, but fails to mention that this subspecies is now listed as threatened under the Endangered Species Act nor does it discuss either the potential impacts or cumulative effects of all the tern-related management activities (people, hazing, ATVs, etc.) on this subspecies and its habitat. This is yet another reason that a new integrated, regional-scale plan is required, and the Streaked Horned Lark should be given active consideration.

In conclusion, PSG recommends the “no action” alternative until such time as the Corps and its cooperators have:

- completed an integrated, multispecies, regional-scale plan, and
- identified and made available one or more quality coastal nesting sites for Caspian Terns.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Stan Senner". The signature is written in a cursive, slightly slanted style.

Stanley Senner  
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