



U.S. Fish and Wildlife Service
MS:BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

January 5, 2018

Re: Docket Nos. FWS-HQ-ES-2015-0126; FWS-HQ-ES-2015-0165

This letter is in response to the request for comments regarding “net conservation gain” in mitigation planning goals under the Endangered Species Act. The Pacific Seabird Group supports no net conservation loss, and with net conservation gains as successful mitigation outcomes.

The Pacific Seabird Group (PSG) is an international, non-profit organization, founded in 1972, to promote knowledge, study, and conservation of Pacific seabirds, with a membership drawn from the entire Pacific basin. 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.

By definition, mitigation planning does not guarantee immediate return to baseline (i.e., before the impact occurred), but in resource conservation, mitigations are actions applied to compensate for some of the negative anthropogenic impacts. In light of increased in human impacts, including climate change, habitat loss, pollution, invasive species, human encroachment, etc., the USFWS should strive to achieve no net conservation loss with regards to mitigation planning under the ESA. Since the trending patterns of environmental deterioration and unintended consequences may hinder full mitigations, **net conservation gain must be required** if ecosystems are to remain as healthy and stable as possible into the unpredictable future.

Sincerely,

Mark Rauzon
Vice Chair for Conservation
Pacific Seabird Group