

TO: Mr. Masaharu Nakagawa Minister of the Environment Ministry of the Environment Government of Japan Godochosha No.5, Kasumigaseki 1-2-2, Chiyoda-ku, Tokyo 100-8975, JAPAN

Dear Minister of the Environment:

We write to express our concern for the placement of the Goto-shi offshore wind power generation project, east of Fukue Island, Nagasaki Prefecture, Japan

We are the Pacific Seabird Group (PSG), an international, non-profit organization that was founded in 1972 to promote the 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. Among its technical committees, PSG has convening a standing Japanese seabird working group that supports conservation and developing monitoring protocols.

On 7 August 2018, a seabird called the Brown Booby (*Sula leucogaster*) has been confirmed breeding at Tateshima Island (Odate and Nakadate), 2.6 km east of Fukue Island, Nagasaki Prefecture, Japan. Throughout the year, roughly 100 Brown Boobies have been observed by Mr. Koichi Ueda and others in this area. (Figure 1). The maximum count (200-300 birds) occurred on 25 November 2017. It is also one of the few places in Japan that provides breeding habitat for the Brown Booby. Prior to Mr. Ueda's team's observations, no other record of a Brown Booby colony existed for the Tateshima Islands area. The newly discovered population is important and should be the subject of detailed investigation because this island is located within 5-10 km of the planned site for nine floating offshore wind turbines.

Also, a national icon, the rare seabird called the Japanese Murrelet (*Synthliboramphus wumizusume*) has also been observed around Kabashima Island, 12 km north from Tateshima Islands, as reported in the current offshore wind power generation project plan report. This report also revealed that more than 30 murrelets were observed in the water around Oshima Island, 8 km south from Tateshima Island in mid-March 2014. Because the murrelets already start breeding in early March, these observations suggest the presence of murrelet breeding colonies. The Japanese Murrelet has been listed as Vulnerable by the IUCN (International Union for Conservation of Nature and Natural Resources) due to their small population size (less than 10,000 breeding birds), restricted range and ongoing losses due to introduced predators (cats, rats) and gill net fisheries. PSG members have participated in the ecological studies of Japanese Murrelets. If breeding colonies are found in this area, it will surely become a great topic of both domestic and global significance.

PSG recognizes the value of alternative energies to combat the excess carbon dioxide produced from using fossil fuels, and we urge special bird-friendly designs that would limit harm to flying birds that do not recognize danger in the rotating blades of the wind turbines.

Detailed surveys are needed to provide information on seabird movements near Fukue-jima Island and its surrounding waters, which are extremely important in ornithology and biodiversity conservation. This area and its neighboring waters are used for foraging and movements by numerous seabirds, such as Brown Boobies, Black-tailed Gulls (*Larus crassirostris*), Streaked Shearwaters (*Calonectris leucomelas*), and Japanese Murrelets.

Japanese Murrelets fly low over the water and dive up to 20 meters. Even if there is no direct collision with the planned turbines, there is likely to be degradation or loss of foraging habitat due to environmental disturbances during the construction and various operations for the project. The same can be applied to Brown Boobies. For these seabirds, we should thoroughly investigate their local movements, foraging area, and breeding colonies etc. to predict more accurately the impacts of these wind facilities during and after construction.

Given the reasons above, we urge you to suspend the Goto-shi offshore wind power generation project plan. We recommend that a detailed environmental study be conducted to develop a significant conservation plan for these seabirds and their vulnerable marine habitat.

Thank you for your consideration.

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Mark J. Rauzon Vice-Chair for Conservation Pacific Seabird Group 4701 Edgewood Ave. Oakland, CA. 94602 USA

Figure 1: Brown Boobies on Takeshima Island



photos: Koichi Ueda