

Pacific Seabird Group



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

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17 April 1998

Michael J. Spear, Director
U.S. Fish and Wildlife Service
911 NE 11th Avenue
Portland, OR 97232

Dear Mr. Spear:

RE: Columbia River Avian Predators and Salmon

It has come to our attention that the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) have decided to use a variety of disturbance techniques to prevent Caspian Terns and Double-crested Cormorants from nesting and roosting on Rice and Miller Sand Islands and nearby areas in the Columbia River estuary this spring and summer. The Pacific Seabird Group, an international scientific seabird organization, is opposed to any harassment of these species without Migratory Bird Treaty Act (MBTA) and the National Environmental Policy Act (NEPA) compliance, including an assessment of whether disturbance to the nesting colonies would protect salmon smolts. Based on the information from a one year study of this colony, we feel that the decision to harass these birds is premature and unjustified.

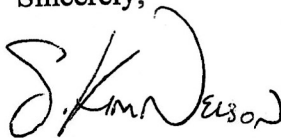
While the estimated 8,000 pairs of Caspian Terns on Rice Island (20-25% of the North American continent population) and the 5,300 pairs of cormorants and 7,100 pairs of Western/Glaucous-winged Gulls on East Sand Island appear to have consumed large numbers of hatchery-raised salmon smolts in 1997, there is incomplete evidence to suggest that this pattern of consumption will be consistent year to year. In addition, there is no evidence to show that

preventing terns from nesting on Rice and Miller Sand Islands will protect salmon smolts, especially if no alternative nesting sites are made available to this species. There is also no evidence to show that removal of fish-eating birds from this area will increase survival of hatchery-raised salmon smolts. Therefore, we oppose any efforts to disturb these birds.

We expect USFWS to base their management decisions on science, and to comply with laws that govern federal actions (NEPA) and bird populations (MBTA). However, it appears that a decision by USFWS biologists, to support collection of additional information on predation in the estuary before harassing the birds (as stated in a letter from NMFS to the Corps of Engineers dated 14 April 1998), was changed by you under political pressure from several congressmen and NMFS. We strongly urge the USFWS to base their decisions on science and not politics, and to abide by the NEPA process by completing an Environmental Assessment addressing the impact of disturbance to the colonies and whether such disturbance will aid in the protection of endangered salmon smolts. We also urge the USFWS to delay any action for at least one season so: (1) additional information can be collected on the interactions between predatory seabirds and salmon smolts, and (2) the possibility of relocating the terns can be investigated. In addition, we hope that the real causes for depleted salmon runs on the Columbia River (e.g., habitat destruction) will continue to be the focus of recovery efforts.

Thank you for your consideration of these comment.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Kim Nelson". The signature is stylized and cursive.

Alan Burger
Craig Harrison
S. Kim Nelson

cc: USFWS -- Oregon Field Station
NMFS -- Habitat Conservation
CRITFC -- Ken Collis
Corps of Engineers -- Bob Willis
PSG -- Executive Council