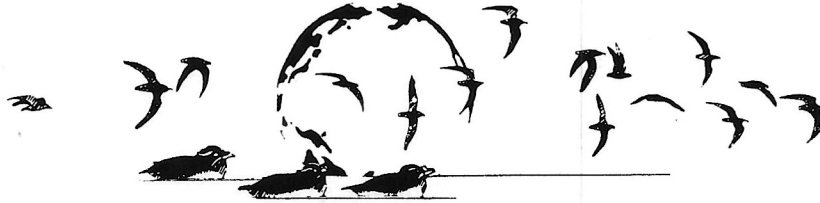

Pacific Seabird Group



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

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July 22, 1998

Jamie Rappaport Clark, Director
U.S. Fish & Wildlife Service
634 Arlington Square
Washington DC 20240

Re: Caspian Tern Management in Columbia River Estuary

Dear Ms. Clark:

The Pacific Seabird Group (PSG) recently wrote the enclosed letter to Mr. Ronald E. Lambertson, Acting Regional Director, U.S. Fish and Wildlife Service regarding the Oregon Department of Fish and Wildlife's draft Predation Action Plan: Avian Species. Oregon's draft plan considers, among other things, imposing drastic controls on the largest Caspian tern colony in the world, which may account for one-quarter of all Caspian terns in North America. Preliminary feeding studies indicate that Caspian terns feed largely on temporary abundances of dazed salmonid smolts in surface waters, many of which were raised in fish hatcheries. PSG firmly opposes actions that would jeopardize the health of Caspian terns.

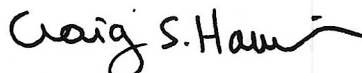
The purpose of bringing this issue to your attention is to suggest that state and federal natural resource agencies are grappling with this issue because FWS and NMFS have failed to mitigate effectively the damages to migratory fishes caused by dams on the Columbia River. The quality of hatchery-raised salmonids is so poor that the percentage of smolts that return to breed in Pacific Northwest drainages is less than 1%, and in many cases only 0.1%. This is contrasted with returns of 4-5% in Iceland and parts of Alaska.

Fishery scientists in FWS have attempted to improve captive propagation of salmonids to retain wild characteristics (the "Keep 'em Wild" initiative), but we understand that the FWS Assistant Director for Fisheries has refused to implement this initiative. This program would harness the energies of the National Fish Hatcheries, Fish Technology Centers, state fisheries agencies, universities and private fish culturists. Among other things, a Keep 'em Wild program would use low-cost changes in diets, feeding techniques and environmental conditions that would result in propagated fish being indistinguishable from wild fish. Such a program could also eliminate problems with hatchery-raised smolts such as a tendency to aggregate in the upper water column searching for food, a lack of resilience and a tendency to be dazed when they are placed in the wild. Improving captive propagation techniques is increasingly important now that several populations of salmonids have been listed under the Endangered Species Act.

We firmly believe that it is unscientific and illegal to destroy or jeopardize healthy seabird colonies because FWS has not devoted the resources necessary to enable salmonids to reproduce successfully in an alien environment that has destroyed their natural breeding strategies.

We urge you to insure that FWS implements a Keep 'em Wild program immediately to stop the impending train wreck in the Columbia River estuary.

Sincerely,



Craig S. Harrison
Vice Chair for Conservation

Enclosure