Pacific Seabird Group

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

Edward C. Murphy
Chair
Institute of Arctic Biology
Irving Building
University of Alaska, Fairbanks
Fairbanks, AK 99775-0180
(907) 474-7154

Craig S. Harrison
Vice Chair for Conservation
4001 North Ninth Street #1801
Arlington, Virginia 22203
(202) 778-2240

Julia K. Parrish
Chair-Elect
Zoology Department
Box 351800
University of Washington
Seattle, WA 98195
(206) 616-2958

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Anne Badgley, Regional Director
U.S. Fish & Wildlife Service
East Side Federal Complex
911 N.E. 11th Avenue
Portland, Oregon 97232-4181

Re: Caspian Tern Management in Pacific Northwest

Dear Ms. Badgley:

The Pacific Seabird Group (PSG) is concerned about the health of the Caspian tern population in the Pacific Northwest. PSG is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG draws its members from the entire Pacific Basin, including Canada, Mexico, Japan, China, Australia, New Zealand, and Russia. Among PSG's members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird populations and refuges, and individuals with interests in seabird conservation. PSG is especially active with regard to oil spill restoration plans, marine sanctuaries, seabird-fishery issues, and protection of endangered or threatened seabird species. Over the years we have advised and worked cooperatively with government agencies to further these interests.

Like Secretary Babbitt, we hope to avoid "train wrecks" and wish to ensure that seabirds do not become endangered. As discussed below, we are concerned that federal agencies are so mismanaging Caspian terns in Washington and Oregon that PSG may petition the U.S. Fish & Wildlife Service (FWS) to list this

population under emergency provisions of § 1533(b)(7) of the Endangered Species Act (ESA). We believe that emergency listing would be warranted if, as now seems possible, the federal government has caused or contributed to a widespread nesting failure of this population. We suggest means that this could be avoided.

PSG recommends that FWS draft and immediately implement a regional plan to restore colonies formerly occupied by Caspian terns in Washington and Oregon. This action would mitigate for the ongoing destruction of the world's largest colony at Rice Island and the apparent failure of the U.S. Army Corps of Engineers to provide suitable alternative habitat (at least half of the 8 acres "created" on East Sand Island contains standing water where terns will not nest). FWS acquiesced to the destruction of the Rice Island colony over PSG's objections to further encourage recovery of endangered salmon runs in the Columbia River system. As you know, the terns at Rice Island have been accused of preying on 5-25% of out-migrating salmon smolts annually in the Columbia River estuary. To reduce this predation, which assumes it has a detrimental effect on salmon escapement, actions are underway by federal agencies to move the colony from Rice to East Sand Island, and ultimately to reduce the Columbia River population from 8,000 to 1,000 pairs.

Currently, no Caspian tern colonies exist in coastal Oregon and Washington, except at Rice Island (8,600 pairs). This has not always been the case. Since 1957, the region has seen the loss of 6 colonies, three in Grays Harbor, one in Willapa Bay, one in Puget Sound and the last near the mouth of the Columbia River estuary. Federal agencies forced terns to leave colonies at Everett Naval Station and at East Sand Island (Columbia River), by design and apparently without a Migratory Bird Treaty Act permit. The others have been lost due to encroachment of human activities on the sandy islands required by the species. Rice Island, an artificial island composed of dredged materials, appeared just in time. While the Caspian tern population there has had poor breeding success in most years, this could be improved by gull control. This species now relies predominantly on dredged material islands throughout its North American range because much of its natural nesting habitat has disappeared. In this regard, managing Caspian terns, like waterfowl, requires intensive habitat management.

The situation in the Columbia River estuary is a major problem. The Rice Island population constitutes 28% of the North American population of this species, 38% of the U.S. population and 67% of the U.S. West Coast population. Besides the concentration of birds at Rice Island, other concentrations occur only in Manitoba and to a lesser degree among the Great Lakes. Breeding populations, thus, are disjunct. Loss or major reduction of the Columbia River population, without compensatory

increases elsewhere in the region, would reduce the U.S. population to the size comparable to those of other bird populations listed as threatened under the ESA. Without the Rice Island colony, the total number of Caspian terns breeding in California, Oregon and Washington would number only about 4,000 pairs.

Therefore, we recommend that the species be restored to former nesting sites in the Pacific Northwest. This may benefit salmon restoration by removing the predation pressure from the Columbia River system. It would also benefit Caspian terns by improving reproductive success in the region. The restoration should utilize active, well-tested protocols used in successful colony re-establishment of other tern species. Included should be appropriate preparation of potential island sites (removal of vegetation; coarse sand, well above water level), placement of tern models with playback recordings of colony calls, and island wardens.

Should you require assistance in planning for this work, PSG would be more than willing to be involved.

Sincerely yours,

Craig S. Harrison

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