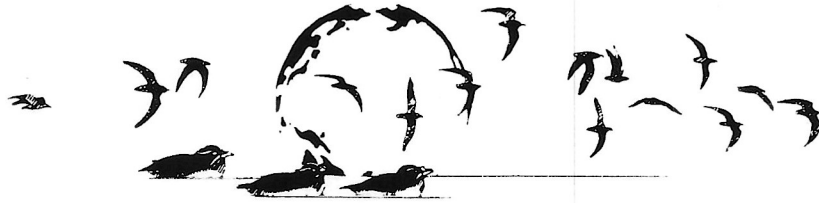


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# Pacific Seabird Group



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

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February 1, 1999

Charles Houghten, Chief  
Division of Refuge Planning (ARW/RPL)  
U.S. Fish and Wildlife Service  
911 N.E. 11th Ave.  
Portland, OR 97232-4181

Dear Sir,

These are the Pacific Seabird Group's (PSG) comments on the U.S. Fish & Wildlife Service's draft Environmental Assessment of the establishment and management of Alameda National Wildlife Refuge in the San Francisco Bay area. We are especially pleased that the primary goal of a refuge is to preserve, restore and enhance seabird species. We heartily support the acquisition of the refuge for Least Terns and take this opportunity to suggest some additional considerations.

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 rim of the entire Pacific Basin, including the United States, 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 marine conservation. PSG is especially active with regard to endangered and threatened seabird species.

The endangered Least Tern is a special concern of the Pacific Seabird Group. Many of our members study this species. Consequently, we support all measures to enhance their

populations including a rigorous campaign to eliminate the threat of non-native species depredations. We realize that this may be a controversial, but insist it is vitally important to the well-being of the entire refuge. We also support non-lethal control of native predators that threaten the colony, including peregrine falcons. However, we stress a multi-species concept in wildlife management and appreciate that the loss of some terns may be necessary to accomplish these goals. We also support enhancing habitat for the rare burrowing owl and goals 2 and 3 that preserve habitat for migratory birds and protects haul-out and roost sites for marine vertebrates. Breakwater Island in particular protects brown pelicans and three species of cormorants.

For planning purposes the proposed replacement of the Bay Bridge would likely displace many double-crested cormorants during demolition. They will scatter about the bay (the cormorants are already moving into egret nesting trees in Lake Merritt and killing the trees, ultimately affecting the egret nesting success). Since goals 2 and 3 are to enhance habitat for birds, a series of nesting structures could be built on the breakwater or on the old Navy pier for cormorants to nest upon. If you build it, they will come! We also support habitat enhancement for Caspian terns and hope that colony can expand -- especially since the U.S. Army Corps of Engineers has plans to destroy the world's largest Caspian tern colony in the Columbia River estuary. Efforts to also attract Forster's Terns and Black Skimmers should be implemented.

As stated, the purposes of the Alameda Wildlife Refuge are to protect threatened and endangered species and to provide opportunities for environmental education. Regarding education, the proposed 8-foot barbed wire perimeter fence is visually oppressive and fails to convey the message of accessible environmental education. It is unnecessary and creates an stifling atmosphere at a wildlife refuge. We share your concerns about human and animal encroachment, but these risks are outweighed by the "overkill" nature of the fence. We suggest a five foot fence so that most people can have an unobstructed view with binoculars and cameras.

We also suggest there be better public access during non-critical times of the year. It is especially important in a dense urban area that people be given access to open space. This strengthens the environmental education aspect of seabird appreciation. In addition, we want people to be able to experience seabirds on some level so they can better appreciate them. This enhanced appreciation will translate into better support for your predator control programs. A video camera placed in the tern colony and a video feed to the Oakland Museums' s coastal diorama is an example of one way to provide virtual access for the public all the time.

We also believe that dredged bay materials from the Oakland harbor could replace the tarmac runways and give the refuge open grassland habitats if designed by landscape engineers.

In conclusion, we support acquisition of the refuge and support enhancement of seabirds on the refuge. If we can be of further assistance, please let us know.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Craig S. Harrison