

Pacific Seabird Group



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

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Nanette Seto
U.S. Fish & Wildlife Service
911 NE 11th Avenue
Portland, Oregon 97232

Re: Scoping Process for Caspian Tern Environmental Impact Statement

Dear Ms. Seto:

On behalf of the Pacific Seabird Group (PSG), we wish to provide comments on the Notice of Intent to Prepare an Environmental Impact Statement regarding Caspian Tern Management in the Columbia River Estuary, which was published in the Federal Register on April 7, 2003. As you know, PSG is an international non-profit organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG takes a broad international perspective in recognition that the oceans are linked by the wandering of seabirds and the flow of ocean currents. Our membership is drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. 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. PSG has long advised and worked cooperatively with government agencies to further these interests. We have played an active role with regard to Caspian tern management in the Pacific Northwest since at least 1998.

We generally support the three broad issues that you have identified that need to be addressed in the environmental impact statement: (1) the impact of Caspian terns on listed salmonids in the Columbia River estuary; (2) the need for active management of Caspian terns; and (3) the need to address management actions that may be necessary to protect salmonid stocks in the Columbia River Estuary. We offer some specific comments on sub-issues within these categories that should be adequately addressed in this process.

With regard to the impact of terns on salmonid recovery, we urge that you use peer-reviewed science to make such an assessment. We have been deeply concerned for years that the National Marine Fisheries Service produces in-house, non peer-reviewed reports on this subject that are not based on credible science. Such reports are merely non-scientific justifications of the National Marine Fisheries Service's pre-conceived policy goals. In particular, we believe that these analyses should distinguish between tern consumption of hatchery salmon and Evolutionary Significant Units that are listed under the Endangered Species Act. The scientific premise and justification for listing Evolutionary Significant Units of salmon is that certain demes of the salmon contain unique genetic information, use unique combinations of environmental and geomorphological conditions, occur over a unique geographic range, and represent a significant ecological component of the natural ecosystem. Hatchery populations of salmonids cannot meet these benchmarks, and are not endangered under the Endangered Species Act. If the environmental impact statement were to consider consumption of hatchery salmonids as consumption of endangered species, at a minimum you should request comment on whether this is a valid approach. Such a discussion should cite to and discuss the scientific justifications in the Federal Register and elsewhere for listing these Evolutionary Significant Units of salmon.

We believe that there needs to be active management of Caspian terns in the Columbia River Estuary. PSG began asking FWS to include East Sand Island in a National Wildlife Refuge in 1999. We believe that the environmental impact statement should specifically evaluate this option, and discuss how including East Sand Island in the National Wildlife Refuge System would or would not contribute to the goals of the National Wildlife Refuge System as expressed by Congress in the National Wildlife Refuge Management Act. The environmental impact statement should also address the feasibility of other agency or private ownership and management options.

Finally, we believe that you should cast a broad net when discussing management options that may be necessary to protect salmonid in the Columbia River. Among these options should be the management of dams on the Columbia River, improved techniques at fish hatcheries, improvements in translocating salmonids, and modification of habitat.

PSG appreciates your consideration of our comments on the environmental impact statement, and will continue to participate in this process as it evolves.

Sincerely,

Craig S. Harrison
Vice Chair for Conservation