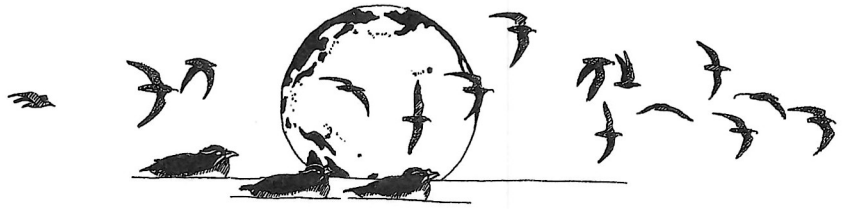


Pacific Seabird Group



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

9209 - 180th Ave. N.W.
Stanwood, Washington 98292
December 1, 1986

The Honorable Walter B. Jones
Room 1334, Longworth House Office Building
Washington D.C. 20515

Dear Congressman Jones:

The Pacific Seabird Group (PSG) is a scientific organization composed of seabird researchers and conservationists dedicated to the study and conservation of Pacific Seabirds and their environment. We have written to you in the past regarding our concerns about federal funding of nongame programs. We have also expressed our concern that the United States Fish and Wildlife Service (USFWS) has reduced their seabird management programs. A letter to USFWS is enclosed for your information.

On another matter, Legislation was passed in the 1986 session that poses a new threat to the management of seabirds. Senators Evans and Gordon from Washington State introduced a bill that changed the boundaries of Olympic National Park, the "Park Boundary Bill", S 2351. This bill was passed by both the House and the Senate and now portions of the Quillayute Needles and the Flattery Rocks National Wildlife Refuges are included in the National Park.

The members of PSG believe that these refuges should be restored to USFWS. We have heard that some "housekeeping" actions are necessary for the "Park Boundary Bill", S 2351 and that the bill will be reviewed in the 1987 session. We urge you to delete Section 1.a.2. of S. 2351. Leave the seabird colonies in the National Refuge System.

Eighty percent of Washington's seabirds nest on the islands in these coastal refuges. The area was established as a refuge in 1908, specifically to protect the large population of migratory birds. This population is one of the greatest remaining concentrations in the lower 48 states.

The exploration and establishment of this refuge was very significant to ornithological history. W.L.Dawson, one of the most famous Pacific Coast ornithologists, was employed by the Biological

Service (now USFWS) to explore the islands. He describes the large seabird colonies in great detail in his book Birds of Washington. Franklin D. Roosevelt established the refuge, and it should remain a refuge to honor his memory. Washington's coastal islands are recognized worldwide as seabird refuges. The beauty of these islands may be appreciated from the shore, but their significance as a sanctuary for Pacific wildlife has long been recognized.

The Islands should be managed by an agency whose responsibility is Wildlife. National Parks are entrusted with outdoor recreation and the preservation of natural features. Wildlife is treated as part of the "Park Ecosystem", but the management of birds is not considered the primary function of the park. Park biologists must manage a large number of wildlife species in a variety of habitats. The specialization required to study and manage seabirds is generally not possible.

The management of seabirds extends well beyond park boundaries. Many seabird species migrate to California, South America, the mid-Pacific, and the Bering Sea. An organization of international, federal and state agencies, the Pacific Flyway, has been established to discuss the management of migratory birds in the Pacific. USFWS is the leader of this organization and handles all the policies, regulations, etc. that the group generates. Communication between biologists in different countries and states is necessary if a population of migratory seabirds is to be correctly managed. In addition, the birds spend relatively little time actually on the refuge. Research into the "At Sea" portion of the breeding season is necessary. USFWS already has a small but an established management program that includes surveys of the entire coastal area, "At Sea" inventories, and coordination of research and management of activities throughout the flyway. Park biologists, on the other hand, rarely work outside of the National Park.

The USFWS has spent years building a data base on Pacific seabirds. Transfer of part of the coastal islands to another agency would disrupt the system and result in incomplete information. Inclusion of these two refuges into the National Park splits the jurisdictions managing the islands. Some of the islands remain as a National Wildlife Refuge. The joint jurisdiction may result in differing management goals and incomplete data collection.

The withdrawal and transfer of these refuges establishes an alarming precedent. The seabird populations may be protected in this case by a National Park, but now that the precedent has been established, what about the possibility of refuge transfers to agencies that exploit rather than protect resources?

The United States Fish and Wildlife Service is the agency mandated to protect and manage migratory birds. Transfer of the refuge islands to another agency is outside of that mandate, is contrary to ornithological history, sets a precedent, and could threaten existing management which has resulted in a relatively stable and secure wildlife population.

Sincerely,