

# Pacific Seabird Group



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

PSG Website: [www.pacificseabirdgroup.org](http://www.pacificseabirdgroup.org)

**Douglas J Forsell**  
**Chair**  
Point Arena, California  
[DJForsell@aol.com](mailto:DJForsell@aol.com)

**Jo Smith**  
**Chair-Elect**  
Smithers, British Columbia  
[josmith@birdsmith.ca](mailto:josmith@birdsmith.ca)

**Stanley Senner**  
**Vice-Chair for Conservation**  
Portland, Oregon  
[ssenner@oceanconservancy.org](mailto:ssenner@oceanconservancy.org)

September 16, 2013

Gary Frazer  
Assistant Director for Endangered Species  
U.S. Fish and Wildlife Service  
1849 C Street NW  
Washington, D.C. 20240

Re: Post-delisting Monitoring of the California Brown Pelican

Dear Mr. Frazer:

The Pacific Seabird Group (PSG) is concerned about the lack of coordinated post-delisting monitoring of the California Brown Pelican (*Pelecanus occidentalis californicus*). A draft post-delisting monitoring plan was released in August 2009 (U.S. Fish and Wildlife Service 2009) and the Brown Pelican was delisted in December 2009, with the expectation that a final monitoring plan would be completed within one year (Federal Register 74 [17 November 2009]: 59444-72). Monitoring is required for a minimum of five years following delisting<sup>1</sup>, and four years after its delisting there is still no coordinated monitoring plan either finalized or in place for Brown Pelicans. We recognize that funding is a limitation. However, the PSG is concerned because monitoring data are needed in order to complete a five-year post-delisting status review in 2014 and to address on-going management issues for the California subspecies.

---

<sup>1</sup> Section 16 U.S.C. 1533(g) provides as follows:

(g) MONITORING.—(1) The Secretary shall implement a system in cooperation with the States to monitor effectively for not less than five years the status of all species which have recovered to the point at which the measures provided pursuant to this Act are no longer necessary and which, in accordance with the provisions of this section, have been removed from either of the lists published under subsection (c).

(2) The Secretary shall make prompt use of the authority under paragraph 7<sup>1</sup> of subsection (b) of this section to prevent a significant risk to the well-being of any such recovered species.

The PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. The PSG's 500 members—drawn from 20 nations—include biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation. The PSG and its members have played major roles in evaluating and recommending conservation actions for many species, including the California Brown Pelican throughout its range. In fact, PSG first called for downlisting of the California Brown Pelican in 1986.

The California Brown Pelican Recovery Plan (U.S. Fish and Wildlife Service 1983) listed three primary objectives, including “...assuring long-term protection of adequate food supplies and essential nesting, roosting, and offshore habitat throughout the subspecies’ range.” The purpose of the draft post-delisting monitoring plan (U.S. Fish and Wildlife Service 2009) “...is to track the status of the brown pelican over time (e.g., colony occupancy, number of nesting pairs), and to verify that the pelican remains secure from risk of extinction after it has been removed from the protections of the Act.” By adopting the Final Rule (Federal Register 74 [17 November 2009]: 59444-72), the Service indicated that:

1. post-delisting monitoring would detect potential declines;
2. adequate roosting habitat was protected and known (at that time) to be limited only in southern California; and
3. threats to the Brown Pelican would be monitored.

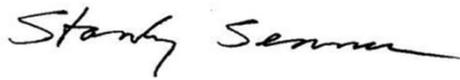
Recent information suggests that changes in the availability and distribution of coastal pelagic prey and impacts of severe weather and other factors potentially related to climate change, may now be negatively impacting California Brown Pelicans. These concerns were previously raised in the delisting process, and the lack of coordinated monitoring data will only make it more difficult to assess and address them. The nearly complete breeding failure in the Southern California Bight in the non-ENSO year of 2012 (Harvey et al. 2013); the pelican’s increased reliance on the Columbia River region during the non-breeding season (Jaques et al. 2009, Jaques and Fee 2013); the lack of a conservation plan for pelicans at East Sand Island, with potentially significant disturbance there (U.S. Army Corps of Engineers 2012, 2013; Wright et al. 2012); unusual mortality events (Nevins et al. 2010); and conflicts between the handling of fish wastes and starving Brown Pelicans in northern California harbors (Jaques 2103), give weight to our concern about lack of monitoring.

In addition, subpopulations in the Gulf of California, although currently believed to be stable (Anderson et al. 2013), have been monitored to the present by Mexico’s CONANP (Godinez-Reyes 2006) and are potentially threatened by several recent developments likely to be seen in the next decade. These include: a recent increase in incidental catch rates of pelicans in the purse-seine fishery of the Gulf (E. Velarde, *pers. comm.*), an impending decline of some major prey species associated with this large and increased purse-seine fishery (E. Velarde, *pers. comm.*), and extensive coastal habitat degradation, mostly due to increased aquaculture operations and also tourism (Anderson et al. 2013). The subpopulation on the southern range periphery (south of Mazatlan to the state of Guerrero), although relatively small, also has a long-term history of decline (Anderson et al. 2013).

The Brown Pelican was one of the first wildlife species to be granted special protective status in the United States, and it is one of the few species to be delisted under the federal Endangered Species Act. Other DDT-era birds are being monitored in a systematic way outlined in final plans. For example, the Peregrine Falcon was delisted in August 1999, a post-delisting monitoring plan was finalized four years later (2003), and monitoring is ongoing. The Bald Eagle was delisted in August 2007, a post-delisting monitoring plan was released three years later (2010), and monitoring began the same year. The Brown Pelican deserves similar attention.

The PSG urges the Service to finalize, fund, and implement the Brown Pelican post-delisting plan so that coordinated monitoring can get underway. The resulting data are essential to effectively address current questions and pressing management issues that bear directly on the future of the California Brown Pelican.

Sincerely,

A handwritten signature in black ink that reads "Stanley Senner". The signature is written in a cursive, flowing style.

Stanley Senner  
Vice Chair for Conservation

## Citations

- Anderson, D. W., C. J. Henny, C. Godinez-Reyes, F. Gress, E. Palacios, K. Santos del Prado, J. P. Gallo-Reynoso, and J. Bredy. 2013. Size and distribution of the California Brown Pelican metapopulation in a non-ENSO year. *Marine Ornithology* 4195-106.
- Godinez-Reyes, C., K. Santos del Prado-Gasca, K. Zepeda-Lopez, A. Aguirre, D. W. Anderson, A. Paras-Gonzalez, E. Velarde, and A. Zavala-Gonzalez. 2006. Monitoreo de poblaciones y condicion de salud de aves marinas y lobos marinos en islas del norte del Golfo de California, Mexico. *Gaceta Ecologia (INE)* 81:31-45.
- Harvey, A.L., D. M. Mazurkiewicz, M. McKown, M. W. Parker, F. Gress, K. W. Barnes, and S. A. Auer. 2013. Status of Breeding Seabirds on Anacapa Island, California, in 2011-2012. Abstract and Presentation at the Pacific Seabird Group Annual Meeting, Portland, Oregon, February 2013.
- Jaques, D.L. 2013. Brown Pelicans and fish waste handling conflicts in northern California harbors, Summer 2012. Unpubl. report to the Kure/Stuyvesant Trustee Council. Pacific Eco Logic. 20 pp + appendices.
- Jaques, D.L., D.W. Anderson, R. Lowe, D. Jessup, J. Holcomb, and S. Fee. 2009. Changes in Non-breeding Brown Pelican Seasonal Presence in the Columbia River Estuary and Hazards of Late Southward Migration in 2008-2009. Abstract and Presentation at the Coastal and Estuarine Research Federation, 20<sup>th</sup> Biennial Conference, Portland, Oregon, November 2009.
- Jaques, D.L., and S. Fee. 2013. Brown pelican mortality patterns in the U.S. Pacific northwest. Abstract and Presentation at the Pacific Seabird Group Annual Meeting, Portland, Oregon, February 2013.
- H. Nevins, M. Miller, L. Henkel, D. Jessup, N. Carion, C. Meteyer, K. Schuler, J. St. Leger, L. Woods, and D. Jaques. 2010. Summary of unusual stranding events affecting Brown Pelican along the US Pacific Coast during two winters, 2008-09 and 2009-10. MWVCRC Unpublished Report. 30 pp.
- U.S. Army Corps of Engineers. 2012. Draft Environmental Assessment: Double-crested Cormorant Dissuasion Research on East Sand Island in the Columbia River Estuary Clatsop County, Oregon. U.S. Army Corps of Engineers, Portland District, CENWP-PM-E-12-01.
- U.S. Army Corps of Engineers. 2013. Draft Environmental Assessment to Adaptively Manage Predation on Caspian Terns in the Lower Columbia River Estuary. U.S. Army Corps of Engineers, Portland District, CENWP-PM\_E\_04-24-2013.
- U.S. Fish and Wildlife Service. 1983. The California brown pelican recovery plan. U.S. Fish and Wildlife Service, Portland, Oregon. 179 pp.
- U.S. Fish and Wildlife Service. 2009. Draft post-delisting monitoring plan for the brown pelican. U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office, Ventura, California. 19 pp.
- Wright, S.K., D.D. Roby, and R.G. Anthony. 2012. Factors affecting the behavior of Brown Pelicans at a post-breeding roost. *Western Birds* 43:21-36.