

Pacific Seabird Group



Douglas Bertram
Chair
Canadian Wildlife Service
9860 West Saanich Road
Sidney, BC V8L 4B2
bertramd@pac.dfo-mpo.gc.ca

Craig S. Harrison, Esq.
Vice Chair for Conservation
4953 Sonoma Mountain Road
Santa Rosa, CA 95404
202-778-2240
charrison@hunton.com

Gregory Balogh
Chair-Elect
USFWS/AFWFO
605 W. 4th Ave. Rm G-61
Anchorage, AK 99501
907-271-2778
greg_balogh@fws.gov

April 21, 2008

Public Comments Processing
Attn: RIN 1018-AV28
Division of Policy and Directives Management
U.S. Fish & Wildlife Service
4401 North Fairfax Drive, Suite 222
Arlington, VA 22203

Re: Proposed Delisting of Brown Pelican From List of Endangered Species

Dear Sirs:

The Pacific Seabird Group (PSG) is an international, non-profit organization founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has an international membership drawn from the entire Pacific basin, including China, Canada, Mexico, Russia, Japan, Australia, New Zealand, and the United States as well as a substantial membership in Europe. Among PSG's members are scientists interested in seabird biology and conservation, managers of wildlife refuges, parks, and natural areas, and other individuals interested in marine conservation. PSG has served as a forum for government, university, and private sector biologists to discuss and resolve issues relating to seabird-fisheries interactions, island restoration, contaminants, endangered species and other topics related to seabird conservation.

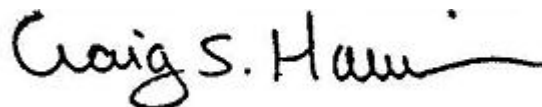
This letter responds to the request for comment in 73 Federal Register 9408. On October 18, 2006, PSG wrote the USFWS in Ventura, California, to support delisting of the California brown pelican from the Endangered Species Act (ESA). We concluded that "from all information available to us that this subspecies has fully recovered" and that "wildlife agencies should acknowledge the positive news that the California Brown Pelican has recovered." Since then, (1) USFWS has completed a 5-year status review of the entire species (February 2007) and concluded that the entire species has recovered and should be delisted; (2) PSG sponsored a debate about delisting at its annual meeting in Pacific Grove, California (February 2007); and (3) the California Department of Fish and Game issued a staff report (December 2007) and concluded the brown pelican in California has fully recovered and should be delisted. A PowerPoint presentation from

PSG's annual meeting and the California Department of Fish and Game report were sent to USFWS in Arlington, Virginia, which we incorporate by reference.¹ We find that the information in these documents, together with the original petition to delist submitted by the Endangered Species Recovery Council and the additional information in the Federal Register delisting proposal² provide compelling reasons to delist the brown pelican. We have no additional information of significance to provide at this time.

The Federal Register notice provided a good review of the non-ESA statutes, regulations and programs that are being implemented to address conservation issues of the brown pelican. Those protections are unlikely to change after this species is removed from the ESA list. We agree with the observation in the delisting proposal that the brown pelican became endangered because of exposure to persistent organic pesticides. We also agree with the statement in 73 Fed. Reg. 9429, col. 2 that there is "no evidence that brown pelicans outside the United States ever declined in response to persistent organic pesticides." As the petition to delist emphasized, despite this species' problems in the Southern California, there was never much or any evidence of similar problems in the Gulf of California, the heart of the range of the California sub-species.³

We would have preferred that the delisting proposal include a proposed monitoring plan pursuant to § 4(g)(1) of the ESA which should recognize that all natural populations fluctuate to some extent over time. We encourage continued monitoring and study of the brown pelican after it is delisted. While we whole-heartedly support delisting because the pelican is no longer in danger of extinction nor is it likely to become endangered within the foreseeable future, PSG recognizes that brown pelicans continue to face challenges and that those concerned about its conservation must remain vigilant.

Sincerely,



Craig S. Harrison
Vice Chair for Conservation

¹ If you need hard copies for the record of this proceeding, please contact us and we will provide them.

² We suggest that in future you include full references to the literature.

³ See also Schreiber, R. W. The Brown Pelican: An endangered species? 30 *Bioscience* 742-47, p. 746 (1980).