

# Pacific Seabird Group



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

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Division of Migratory Birds & Habitat Programs  
U.S. Fish and Wildlife Service  
911 N.E. 11th Avenue  
Portland, Oregon 97232-4181

## **Re: Management of White Pelicans**

Dear Ms. Thorson and Mr. Bortner:

On behalf of the Pacific Seabird Group (PSG), we wish to express our concern about the management of white pelicans (*Pelecanus erythrorhynchos*), especially in the State of Idaho. PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. White pelicans have long been a species of interest to PSG, and we recently convened a symposium on white pelican biology and provided financial support for its publication.

PSG is concerned that officials in the State of Idaho are taking actions to reduce the numbers of white pelicans in ways that could be detrimental to the management of the species as a whole. Last year the Idaho Department of Fish and Game attempted to obtain a permit under the Migratory Bird Treaty Act to shoot white pelicans and/or oil their eggs in order to reduce by half

Director Robyn Thorson  
Mr. Brad Bortner

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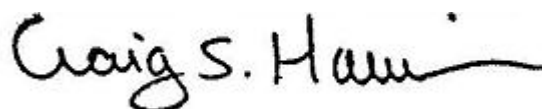
the population of this species in southern and eastern Idaho. We understand that the Service declined to issue such a permit on the grounds that it constituted an inappropriate eradication program. According to press reports, Idaho officials have recently released predators such as badgers and skunks onto Gull Island in the Blackfoot Reservoir. We understand that the Idaho officials are taking these actions after being pressured by fishermen who believe that white pelicans are responsible for eating too many game fish, including Yellowstone cutthroat trout.

PSG is concerned about these developments for two reasons. White pelicans are protected by the federal Migratory Bird Treaty Act and releasing predators on a nesting island seems a means of circumventing the permit program that exists to ensure that all migratory birds are managed rationally. Piscivorous birds are often unfairly blamed for declines in sport fisheries and commercial fisheries without compelling evidence as to what role, if any, they actually play. Decisions about the management of white pelicans should be based on rigorous scientific analysis that puts the impacts of pelicans on any particular fish stock into the context of other factors affecting that stock, such as drought or water management for other purposes (e.g., withdrawals for irrigated agriculture). In addition, PSG is very concerned about releasing predators into any bird colony. We have spent vast amounts of time, effort and resources to reverse the impacts of predator introductions in seabird colonies throughout the Pacific. There is no reason to believe that badgers and skunks will “target” their predation to any specific species, and there could be severe unintended consequences from such actions. For example, seabird populations have suffered dramatically from the introduction of foxes to many Aleutian Islands, mustelids to other islands in Alaska, mongooses to islands in Hawaii, brown tree snakes to Guam, and rats to islands around the world.

PSG strongly believes that white pelicans in Idaho should be managed in a regional or flyway context. The State of Washington lists white pelicans as endangered and the State of Idaho considers it to be a species of special concern. Oregon and California might also be interested in enhancing white pelican populations within their boundaries. Pelican populations in all three of these states are likely strongly linked to those in Idaho. Overall, the American white pelican population in western North America is much smaller than east of the Continental Divide and management decisions in the west should consider that smaller population level.

In the spirit of the Landscape Conservation Cooperative paradigm, we urge you to work collaboratively with Idaho officials to ensure that management of white pelicans is conducted using a rigorous scientific approach that takes into consideration multi-state management issues. Please contact us if we can be of further assistance regarding this issue.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Craig S. Harrison  
Vice Chair for Conservation