



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pacific Islands Ecoregion  
300 Ala Moana Boulevard, Room 3-122  
Box 50088  
Honolulu, Hawaii 96850

In reply refer to: KBF

February 17, 1999

Seabird Technical Working Group  
Tesoro Hawaii - SPM Hose Spill  
Hawaii

Re: Preliminary Methodology for Estimation of Damages to Seabirds from the 24 August 1998  
Tesoro SPM Hose Spill

Dear Fellow Working Group Members:

The U.S. Fish and Wildlife Service (Service) has reviewed the above referenced document, dated January 22, 1999, and offers the following comments for your consideration.

Pg. 1 Par. 1 Sentence 7. - Omit "and Oahu" as this is an incorrect statement. Feather and tarball samples collected on Oahu have matched the 24 August 1998 Tesoro SPM Hose Spill (SPILL). Furthermore, additional samples from Oahu exist, at the Clean Islands Council storage facility, that have not yet been analyzed.

Pg. 1 Par. 2 Sentence 2. Change sentence to read: "Major seabird colonies are present on Oahu (Mokapu - Marine Corps Base Kaneohe, Moku Manu - State of Hawaii Seabird Sanctuary, Manana - State of Hawaii Seabird Sanctuary), Kauai (Kilauea Point National Wildlife Refuge), Kaula Rock (State of Hawaii Seabird Sanctuary), and Lehua (State of Hawaii Seabird Sanctuary)."

Pg. 1 Par. 2 Sentence 5. Change sentence to read: "**Identification** of injured and dead seabirds indicate that the most **frequently found** seabird species were the Brown Booby (*Sula leucogaster plotus*) and Red-footed Booby (*Sula sula rubripes*), which together accounted for 44 of 53 birds recovered during the SPILL." At this time, statements about relative impacts to species are premature.

Pg. 2 Par. 2 Sentence 2. Change sentence to read: "Counts were carried out at colonies on Oahu at Mokapu (6 October 1998), Oahu at Kaena Point (8 October 1998), Moku Manu Islands (9 October 1998), Manana, Kaohikaipu, and the Mokulus (12 October 1998) Kauai at Kilauea Point (21, 29 and 30 September 1998), Lehua Island (23 September 1998), and Kaula Rock (16 November 1998)."

Pg. 3 Par. 1 Sentence 2. The Service disagrees with the statement "We assume that the behavior of boobies and tropic birds is comparable to that of pelicans, and that most of the injured birds returned to land." The Service believes that red-tailed tropic birds (*Phaethon rubricauda rothschildi*) and white-tailed tropicbirds (*Phaethon lepturus dorotheae*), should not be lumped with boobies with respect to returning to land. Nest sites for tropic birds are inaccessible, and confound the detection of their return to land.

Pg. 3 Par. 4. The Service disagrees that persistence rates of 99% to 80% should be used on Hawaiian island beaches. There are a full range of scavengers and higher temperatures, compared to the mainland, that accelerate carcass decay.

Pg. 4 Par. 1. Add: "The estimates of rates of oiling of red-footed boobies derived from the surveys at Kilauea Point should then be applied to the entire local population exposed by virtue of their ability to have flown to areas (e.g. Channel between Kauai and Oahu) that were oiled."

Pg. 4 Par. 3. Sentence 3. Change Sentence to read: "These rafts were at risk." Add: "Please note that a census to discern SPILL-related impacts to the federally listed endangered species Newell's Shearwater or Hawaiian Petrel were not conducted. Access to these colonies was not possible due to their remote location."

Pg. 4 Par 3. Sentence 4. Change Sentence to read: "Birds that were injured may have drifted westward, with the prevailing tradewinds, and never made landfall."

The Service appreciates the opportunity to comment on the proposed project. If you have questions or comments, please contact Fish and Wildlife Biologists Kevin Foster (808/541-3441) or Beth Flint (808) 541-1201.

Sincerely,

Beth Flint  
Kevin Foster  
Don Palawski

cc: DOI Solicitor