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April 14, 2009

Mr. Ren Lohofener, Regional Director
California and Nevada Region
U.S. Fish and Wildlife Service
2800 Cottage Way, W-2606
Sacramento, CA 95825

RE: Alameda Point National Wildlife Refuge

Dear Ren:

On behalf Audubon California's nearly 100,000 members and supporters and our eight local Bay Area chapters, I write to urge you to renew your request to the Navy for transfer of the proposed Alameda Point National Wildlife Refuge to the United States Fish & Wildlife Service (Service). Protection of this property and management for endangered species conservation is critical to the survival and recovery of the endangered California Least Tern, and other bay wetland related species at and near the site.

The proposed wildlife refuge has long been recognized for its importance to the California Least Tern, which began nesting there by 1976 when the Naval Air Station was still operational (Euing 2008)¹. Faced with loss and degradation of the once extensive bay-beach habitats historically used by the terns during nesting, California Least Terns colonized the base's tarmac, which despite the challenge of airplane use, shared important characteristics of historic breeding habitats: unobstructed panoramic views against predators and access to nearby productive open water foraging habitats. Management for California Least Tern conservation during base operations and subsequent to closure helped to grow the breeding colony from the ten breeding pairs documented in 1976 to over 300 and 400 pairs since 2003. The breeding colony now ranks in the world's top ten colonies for breeding pairs and fledgling production (Euing 2008), making it a critical source of population growth and spread of the species.

In addition to its importance to the California Least Tern, the site is a valuable resource for over 140 species of birds that have been observed at the proposed refuge's wetland, grassland, and open water habitats in the last few years. The proposed wildlife refuge also provides the largest known roosting location for California Brown Pelicans in the San Francisco Bay Area. As many as 8,500 pelicans have been observed at one evening roost count (July 2006), and seasonal numbers reach 1,000-3,000 pelicans roosting on the breakwater island (Leora Feeney, personal communication 2008)².

Due primarily to the site's California Least Tern breeding colony, Audubon California designated the proposed Alameda Point Wildlife Refuge as one of California's 145 Important Bird Areas. Important Bird Areas are part of a global and international network of bird conservation, representing the most critical habitats for bird populations worldwide.

¹ Euing, Susan. 2008. Breeding Status of the California Least Tern at Alameda Point, Alameda, California, 2007. Unpublished draft report prepared for the U.S. Navy, U.S. Fish and Wildlife Service. Fremont, California.

² Leora Feeney communication to Audubon California September 18, 2008 regarding Alameda Wildlife Refuge Important Bird Area.

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Audubon California commends the Service and the Navy for California Least Tern conservation efforts to date. Further, we support the long-term conservation of the California Least Tern through transfer of title to the Service and formal recognition of the site as a National Wildlife Refuge. We offer our support to you and the Service to identify and press forward on a strategy that supports the unique values of this important site.

Thank you for your consideration of our views.

Sincerely,

A handwritten signature in black ink, consisting of a large loop on the left and a long horizontal stroke extending to the right.

Graham Chisholm
Vice President and Executive Director

CC: Mendel Stewart, U.S. Fish and Wildlife Service
Mike Lynes, Golden Gate Audubon Society
Leora Feeney, Friends of the Alameda Wildlife Refuge
Arthur Feinstein, Sierra Club, San Francisco Chapter
Florence LaRiviere, Citizens Committee to Complete the Refuge
David Lewis, Save the Bay
Michael Sherwood, Earth Justice
Beth Huning, San Francisco Bay Joint Venture