



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Caribbean Field Office
P.O. Box 491
Boqueron, Puerto Rico 00622

April 25, 1997

Captain R.C. Wigger
Chief, Marine Safety Division
Seventh Coast Guard District
U.S. Coast Guard
909 SE First Avenue
Miami, Florida 33131-3050

Dear Captain Wigger:

We have the following comments in response to your request for review and concurrence with your determination of no effect of the proposed pre-authorization to use oil dispersants to treat floating oil in waters of Puerto Rico and the U.S. Virgin Islands on listed species. This response is provided in accordance with Section 7 of the Endangered Species Act, as amended.

As expressed in previous communications with personnel from the National Oceanic and Atmospheric Administration (NOAA), listed species that may be affected by the proposed action include the West Indian manatee (*Trichechus manatus*), the brown pelican (*Pelecanus occidentalis*), the roseate tern (*Sterna dougallii*), and nesting leatherback (*Dermochelys coriacea*), hawksbill (*Eretmochelys imbricata*), and green (*Chelonia mydas*) sea turtles. Manatees, pelicans and roseate terns in Puerto Rico may venture out to sea into areas where dispersants might be used during an oilspill event ("Green Zone").

We understand that the use of dispersants may prevent the formation of tar balls, and reduce the binding of oil droplets to objects in the shoreline. Little information, however, is available on the direct and indirect effects of dispersant application on the above-mentioned species (e.g., effect of direct contact on manatee skin, effect on sea turtle eggs, and ingestion by roseate terns and their chicks). Finfish accumulate petroleum hydrocarbons for several days after exposure, thus making them available to feeding pelicans, terns, and their young. Although dispersed tar balls and oil droplets may not adhere readily to the skin of manatees and sea turtles or their eggs, the effect of the dispersant is not known. For these reasons, we would like to suggest that, to avoid adverse effects of the proposed activity on listed species, the following measure be taken:

1. A Service biologist should be present at the action site immediately prior and during the application of dispersants. If no listed species are present at the action

site, dispersant application should proceed. The site would be surveyed after application of dispersant until no visible trace of dispersant is observed on the water surface, to determine if any listed species comes in contact with the dispersant.

We believe that, with the expected full coordination with the natural resource trustees during activities associated with the use of dispersants and the implementation of the above measure, the proposed action is not likely to adversely affect listed species.

This does not constitute a Biological Opinion as described under Section 7 of the Endangered Species Act, however, it does fulfill the requirements of the Act and no further action is required. If additional modifications are made to this project, or if additional information indicating potential impacts to listed species becomes available, consultation should be reinitiated.

We have assigned log # 4-4-97-101 to the proposed project, and would appreciate it if you refer to this number in any future correspondence.

Should you have any questions, please do not hesitate to contact Dr. Jorge E. Saliva from our staff at (787) 851-7297.

Sincerely,



James P. Oland
Field Supervisor

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cc: Lt. Brad Benggio, Scientific Support Coordinator, NOAA, Miami