

Compatibility Determination for Amateur Radio Operations at Baker Island National Wildlife Refuge

I. INTRODUCTION

During the 14-day public comment period ending May 8, 2017, the U.S. Fish and Wildlife Service (Service) received written comments, with 24 e-mail letters in strong support of allowing Amateur Radio Operations at Baker Island National Wildlife Refuge (Refuge). No comment responses opposing the activity were received. Comments and suggestions are summarized below.

II. COMMENT RECEIVED, RESPONSES

As comment uniformity permits, comments received on similar concerns or topics have been grouped together. Copies of the actual letters are not reprinted here, however, comments have been paraphrased to reflect the comment provided. The Service responses immediately follow the comment(s).

Comment 1: Some of the normally used support boats have helicopters on deck - so provisions for an LZ should be included in your outline of conditions, permits, etc.

Response: Baker Island is a low flat coral island with less than a square mile of dry land (0.81 mi²). It is an important seabird and shorebird foraging and resting area with 11 seabird species known to nest on the island including boobies, frigatebirds, and almost 1 million pairs of sooty terns. There is no likely landing zone that would not have nesting birds and bird strike hazards would be very high. Helicopter operations are generally not compatible with seabird nesting colonies.

Comment 2: A reasonable "human waste burial" allowance should be part of the permit.

Response: To accommodate this request, the food items for personnel on island cannot include any fruits and vegetables with seeds that can pass through the human digestive tract. The stipulations attached to the compatibility determination have been modified to allow for the construction of a long drop latrine in compliance with protocols that will be included in the Special Use Permit. Stipulation 11 has been changed to read:

11) A long drop latrine and/or all sanitation equipment must be designed to exclude access by birds and crabs. The location and digging of any long drop latrine must be approved by the Resource Monitor. Latrine construction and dismantling protocols as well as dietary restrictions required for use of a long drop latrine will be included in the SUP. Human waste that is not contained in an approved latrine and all other waste that is produced by the group will be removed from the island and properly disposed of or recycled outside of Baker Island NWR.

Comment 3: Require that a U.S. Citizen be signatory on any permit.

Response: U.S. citizenship is not a requirement to apply for a Special Use Permit. Applications will be reviewed on a case-by-case basis.

v.6.12.17 Response to Comments, Amateur Radio Operations at Baker Island NWR

Comment 4: Require that radio operations group include at least one person with advanced medical training.

Response: A safety plan with provisions for medical emergencies is a component of the final Special Use Permit. There are a variety of avenues to provide medical support to remote island camps. The Service contracts with a 24-hour telephone medical doctor support service for Service personnel and volunteer staff. Specific safety precautions will be determined by the expedition plan components.

Comment 5: A Satellite Phone "back-up" to the included radio links should be considered in a minimum level of communications plan.

Response: A safety plan with provisions for back-up communications is a component of the final Special Use Permit. The Service Resource Monitor will be equipped with a standard safety kit including a satellite phone, an Emergency Position Indicating Radio Beacon or EPIRB; and inReach Explorer® for communications with the Service. The transport vessel must meet all U.S. Coast Guard safety requirements.

Comment 6: Require some form of protection from any wild animals present on the island.

Response: The only species on the island that is known to be injurious to humans is an invasive fire ant. Strict quarantine procedures are critical to prevent introduction of additional invasive species.

Comment 7: The base of operations could be on the boat. The bulk of the fuels and food could be stored onboard the boat until needed on a daily resupply visit. Meals could be cooked aboard and then ferried to the operating location. The crew could be ferried between shifts or broadcast from the boat to reduce impacts to the island. We would only need to visit island once a day to check remote radio system and add fuel to the generators.

Response: Landing conditions at Baker Island can be variable and potentially hazardous. Sufficient emergency food and water for the entire group for an additional 7 days must be maintained onshore in case inclement weather prohibits safe landing. According to American Radio Relay League rules, all stations contacted must be land stations. Contacts with ships and boats, anchored or underway, and airborne aircraft, cannot be counted.

Comment 8: The Resource Monitor should not be a requirement; or appoint one of the group members as Resource Monitor so that they can be self-contained.

Response: The Service has an obligation to ensure protection of wildlife and cultural artifacts. Trained Resource Monitors are required for most permitted visitor activities throughout the Pacific Monuments to confirm compliance with biosecurity protocols and other permit conditions. Inadvertent introduction of non-native seeds and other organisms can have disastrous impacts on the

v.6.12.17 Response to Comments, Amateur Radio Operations at Baker Island NWR

ecosystem. Visitors may be unaware of the effects their actions have on wildlife; be unfamiliar with the symptoms of overheating in a bird; and not recognize potential hazards to wildlife. Approved Resource Monitors have been trained for conditions to watch for on Baker Island NWR; and, have past experience working in a biological capacity on the Pacific Remote Islands refuges. If an applicant has a candidate biologist within the group who meets these qualifications, they will be evaluated on a case-by-case basis. The biologist must have previous experience at the site, or a Service-approved suitable proxy habitat, to perform the Resource Monitor duties.

Comment 9: You should allow up to 3 different groups during any one year when conditions are highly favorable.

Response: The Service does not have the resources to support 3 separate expeditions to Baker Island NWR in a year. We have determined that the Service can support one expedition to the Refuge every 5 years without causing harm to the wildlife.

Comment 10: In stipulating rules for each DXpedition, the Service should request a 6-meter band Earth-Moon-Earth (EME) station be in operation if at all possible.

Response: The specific components of the amateur radio operations will be at the discretion of the applicant. The apparatus for each component will be evaluated to determine potential hazards to wildlife.

Comment 11: We want to use a foreign-flagged vessel and depart from Fiji instead of a U.S. port.

Response: The vessel must meet all stipulated biosecurity practices and all U.S. Coast Guard requirements that may apply to the transportation of Federal employees and vessel operation in waters of the United States. The trip itinerary must accommodate the requirement for the Service to inspect the vessel prior to departing for Baker Island. Service employees are required to obtain a Foreign Country Clearance prior to travel to a foreign country. We cannot guarantee that a clearance will be approved within the timeframe needed to authorize the expedition. We will review requests to accommodate standby expeditions on a case-by-case basis.

Comment 10: The group size could be expanded to 20 members of the expedition by restricting on-shore personnel to a maximum of 12 operators.

Response: Past experience with numerous expeditions to the remote islands refuges has taught us that 12 is the maximum size group for one Resource Monitor to manage while looking out for the refuge resources without causing undue disruptions to wildlife. Requests for larger groups to remain on-board will be considered to determine whether additional Resource Monitors are required.