



18 August 2006

Field Supervisor  
Attn: WSP-4d  
Arcata Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
1655 Heindon Road  
Arcata, California 95521  
Fax: 707-822-8411

Dear Sir/Madam:

The U.S. Shorebird Conservation Plan Council (Council) represents a collective of individuals and organizations interested in the long-term conservation of the hemisphere's shorebirds. Accordingly, we are interested in maintaining, and improving, the status of the Pacific coast population of the Western Snowy Plover. Several of our partners have provided detailed comments on the proposed rule for special regulations for this population of the Snowy Plover.

The Council understands the difficulty in balancing recreational and commercial demands with the conservation of biological diversity on the coast and appreciates the intent of the U.S. Fish and Wildlife Service to establish positive incentives for entities involved in the recovery of the Pacific coast population of the Western Snowy Plover. However, we feel that the proposed rule does not present a realistic, workable model for inter-agency cooperation towards recovery goals. The rule is also not based on strong enough biological criteria to reach population level recovery goals and the ultimate removal of the population from the Endangered and Threatened Species list.

The three reasons given for the necessity of this special rule for the conservation of the plover (recognize positive recovery efforts by relaxing regulatory oversight, provide incentives for managers where plover numbers have not met targets, and better enable the Service and other entities to target resources where recovery needs are greatest) are positive, but existing mechanisms are available to achieve these goals. The practical effect of the proposed rule will be to: 1) not reward the primary management agencies willing to continue to manage for plovers, 2) reward others not doing the necessary work to recover the population, and 3) shift investment of resources in ways that are not the most cost-effective for plover recovery. More importantly, as the basis for relaxation of Section 9 prohibitions is not biologically substantiated, the effect of the rule likely could be to prolong, perhaps even indefinitely, the time to recovery of the plover population and thus the conflicts arising from demands on coastal habitats.

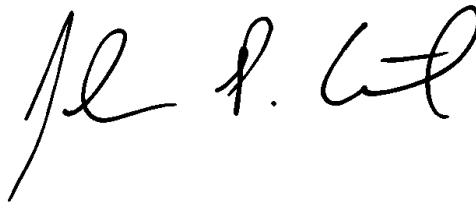
We believe that maintaining at least the current level of conservation activity for plovers and other wildlife, combined with increased levels in areas not meeting their plover population goals, is the effective way to speed up recovery and achieve an acceptable and sustainable balance of recreational

activity and habitat protection in coastal habitats. The population level recovery target of 3,000 breeding birds, adequately distributed among the recovery units, should be reached before relaxing Section 9 prohibitions in any particular area. Even then, long-term maintenance of the population will continue to require a certain level of consistent and institutionalized protections.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Catherine Hickey". The script is fluid and cursive, with the first name and last name clearly legible.

Catherine Hickey  
Chair, U.S. Shorebird Plan Council

A handwritten signature in black ink that reads "John P. Cecil". The signature is more stylized and compact than the one to its left, with some letters being more condensed.

John P. Cecil  
Vice Chair, U.S. Shorebird Plan Council