



The U.S. Shorebird Conservation Partnership

Building Collaborative Action for Shorebird Conservation

Brian W. Smith, Chair
U.S. Fish and Wildlife Service
Migratory Birds, Region 6
134 Union Blvd.
Lakewood, CO 80228 USA

Catherine Hickey, Vice-Chair
Conservation Director
Point Blue Conservation Science
3820 Cypress Drive #11
Petaluma, CA 94954 USA

Brad A. Andres, Coordinator
U.S. Fish and Wildlife Service
Bird Habitat Conservation, HQ
755 Parfet, Suite 235
Lakewood, CO 80215 USA

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Mr. Adam Smith
Alaska Division of Mining, Land, & Waters
Department of Natural Resources
550 West 7th Ave, Suite 900
Anchorage, Alaska 99501

Dear Mr. Smith:

We, the Council of the U.S. Shorebird Conservation Partnership (USSCP) request that the Department of Natural Resources Division of Mining, Land, and Waters (DMLW) consider adopting Concept Plan 2, with some modifications, for the proposed Kasilof Special Use Area Site Improvements Project. Concept Plan 1 clearly provides the greatest benefit to wildlife and shorebirds and meets the goals of the designated Kasilof Special Use Area. However, we understand the legislative constraints the DMLW is under to make some improvements to the area for the personal use fishery.

The USSCP and its Council is a collective of individuals and organizations who are focused on the long-term conservation of the Western Hemisphere's shorebirds. USSCP representatives have extensive experience in Alaska and include Federal agencies, State agencies, and non-governmental organizations. We work collaboratively to address shorebird conservation issues and propose solutions.

Surveys conducted along the north shore of the Kasilof River mouth since 2013 have documented extensive use by 29 species of shorebirds. Tens of thousands of shorebirds use this critical area during their migration each May and on their return trip in August and September; more than 20,000 shorebirds have been recorded during a single day in May. Significant use of the Kasilof River mouth by migrant shorebirds qualifies it as a site of regional importance if nominated to the Western Hemisphere Shorebird Reserve Network (see www.whsrn.org).

In addition to the importance to migrant shorebirds, the Kasilof River mouth is critical for the overwinter survival of the nominate subspecies of Rock Sandpiper that breeds on Bering Sea Islands and spends the winter in Cook Inlet. Survey data reveal that between 27% and 39% of this Rock Sandpiper population is found at the mouth of the Kasilof River during winter and early spring. This magnitude of use qualifies the Kasilof River as a site of, at least, international importance to Bering Sea Island Rock Sandpipers if nominated to Western Hemisphere

Shorebird Reserve Network. Clearly, the Kasilof Special Use Area is of great value to migrant and wintering shorebirds, and Concept Plan 1 is the best option for fully protecting shorebirds and their habitat.

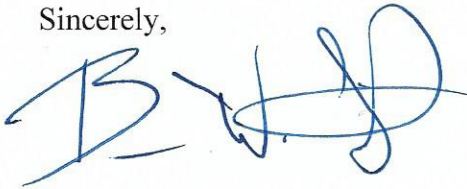
That said, modifications to Concept Plan 2 could provide a reasonable and acceptable alternative.

1. Because the Personal Use (PU) fishery peaks for less than one month, we recommend dividing the large, 132-space parking lot into two units, gating the units, and keeping only one unit open except during the peak PU fishery period. The smaller lot should also be gated and kept closed except for peak PU fishery period. These modifications should decrease maintenance costs.
2. Because of potentially increasing human use, regulations should be developed that 1) prohibit off-road vehicle use in the adjacent wetlands, 2) re-enforce the dune access restrictions provided by fencing, and 3) restrict the number of vehicles on the beach during critical bird migratory periods.
3. To provide less disruptive wildlife viewing opportunities, the planned viewing deck should be moved to the southwest corner of the western parking lot. An elevated viewing platform would provide outstanding views of the inlet, allow observation of shorebirds on the mudflats at a safe non-threatening distance, would not encroach on wetlands, and would limit use of areas on the eastside.

If Concept Plan 1 is not a feasible option for the DMLW, then the Council of the U. S. Shorebird Conservation Partnership believes the above modifications to Concept Plan 2 will have the least impact on shorebirds and other wildlife.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brian W. Smith', with a stylized flourish at the end.

Brian W. Smith, Chair
U.S. Shorebird Conservation Council