



# The U.S. Shorebird Conservation Partnership

*Building Collaborative Action for Shorebird Conservation*

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25 November 2015

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) delay and modify the proposed Kasilof Special Use Area Site Improvements Project. The proposed project on the north bank of the Kasilof River includes construction of a 315-space parking lot and a 40-foot, two-way beach access ramp. We believe the proposed project is in conflict with the goals of the designated Kasilof Special Use Area.

The USSCP and its Council is a collective of individuals and organizations who are expert in 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 Western Hemisphere Shorebird Reserve Network site of Regional Importance (see [www.whsrn.org](http://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 Western Hemisphere

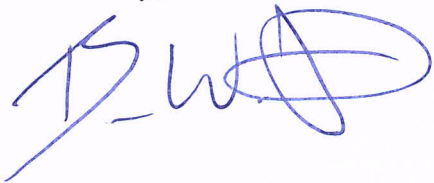
Shorebird Reserve Network site of International to Hemispheric Importance for Bering Sea Island Rock Sandpipers.

The proposal for Site Improvements does not acknowledge use by any wildlife of the Kasilof Special Use Area. Furthermore, it does not provide any mitigation options to reduce human impacts to the Kasilof Special Use Area. People's activities in the Kasilof Special Use Area during spring and fall migrations will likely reduce or eliminate use by shorebirds. Numbers of off-road vehicles on the beach, dogs off leashes, pedestrians in wetlands and the sand dunes will increase in response to proposed development of the large parking lot with no management plan or regulations in place to address impacts.

Reducing the footprint of the proposed improvements, restricting pedestrian and vehicle access, eliminating overnight use, and creating a Kasilof Special Use Area management plan would restore the balance between wildlife habitat protection and public use.

The Council of the U. S. Shorebird Conservation Partnership does not support the proposed Site Improvements to the Kasilof Special Use Area as presented by the DMLW on October 15, 2015. If the suggested modifications are incorporated, the USSCP would be pleased to review them and provide further comments.

Sincerely,

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

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