



The U.S. Shorebird Conservation Partnership

Building Collaborative Action for Shorebird Conservation

Public Comments Processing
ATTN: FWS-R1-ES-2020-0079
U.S. Fish and Wildlife Service, MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

24 May 2021

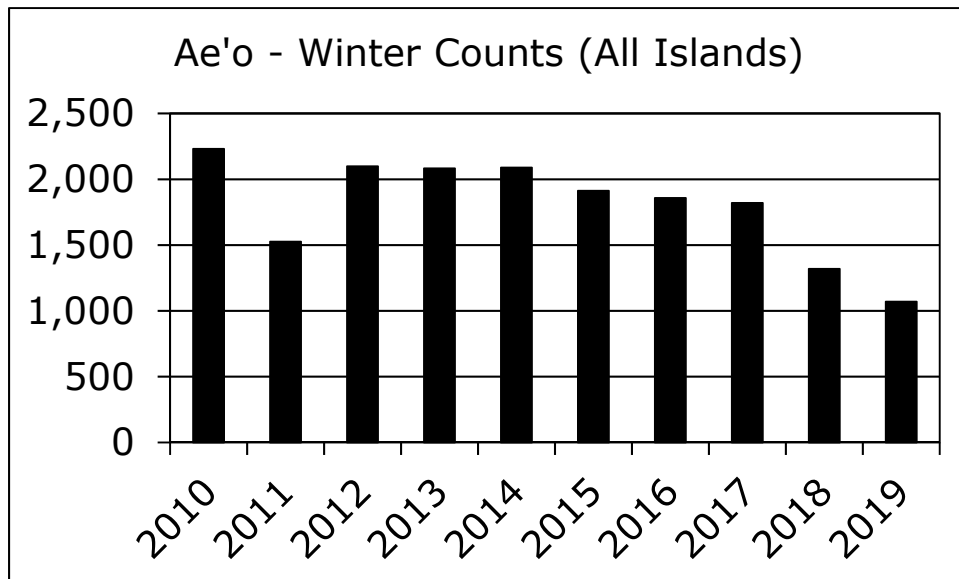
Dear Sir/Madam,

On behalf of the U.S. Shorebird Conservation Partnership's Council, We are writing to provide additional information pertinent to 50 CFR Part 17 (FWS-R1-ES-2020-0079), "Endangered and Threatened Wildlife and Plants; Reclassification of the Hawaiian Stilt From Endangered to Threatened With a Section 4(d) Rule."

The U.S. Shorebird Conservation Partnership (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 shorebird conservation and include federal agencies, state agencies and non-governmental organizations. We work collaboratively to address shorebird conservation issues and propose solutions.

Although we agree with much of the analysis provided by the U.S. Fish and Wildlife Service to justify downlisting the ae'o (Hawaiian Stilt) from Endangered to Threatened (e.g., new PVA describing density-dependence, current and future management actions for the species), we are concerned about the recent trajectory of the population. In the section on *Range, Abundance, and Population Trends*, you state that "Years where counts surpassed 2,000 individuals have been followed in the subsequent year by a decrease of 300 to 700 birds (DOFAW 2020)" and later state that winter counts are less variable than summer counts due to variability in reproductive success. Your analysis includes count data through 2017 and you state that "Winter and summer surveys for Hawaiian stilts show a fluctuating population, which generally increased from 1987 to 2004 and since then has been roughly stable at 1,500 to 2,000 individuals".

Recent data indicate that winter counts in the DOFAW Waterbird Population Census Database in 2018 and 2019 dropped below 1,500 stilts for the first time since 2004 (see below). In fact, there has been a monotonic decrease in the total island population since 2014, which contradicts the fluctuating population idea presented above. We therefore suggest that the U.S. Fish and Wildlife Service delay a decision regarding downlisting until the 2020 and 2021 winter count data are reviewed, the updated PVA analysis is published in a peer-reviewed journal, and new count data is evaluated within the context of the updated PVA.



Thank you for the opportunity to comment.

Sincerely,

Catherine Hickey, Vice Chair
U.S. Shorebird Conservation Partnership Council