



## The U.S. Shorebird Conservation Plan

*Building Partnerships for Shorebird Conservation*

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Mr. Michael B. Murray  
Superintendent  
Outer Banks Group  
National Park Service  
1401 National Park Road  
Manteo, North Carolina 27954

Dear Superintendent Murray,

On behalf of the U.S. Shorebird Conservation Plan we would like to offer comments on your consideration of how to manage beach driving for the protection of migrant and breeding shorebirds at Cape Hatteras National Seashore (Seashore). The U.S. Shorebird Conservation Plan Council represents a collective of individuals and organizations interested in the long-term conservation of North American-breeding shorebirds, as outlined in the U.S. Shorebird Conservation Plan. We believe management actions taken by the National Park Service at Cape Hatteras have implications for beach management beyond the Seashore.

Cape Hatteras National Seashore provides important beach habitat for nesting Piping Plovers, American Oystercatchers, and, historically, Wilson's Plovers. All of these species have small population sizes and are either listed under the Endangered Species Act (ESA) or are considered of high conservation concern. The Seashore also provides important shorebird stopover and wintering habitat for species such as the Red Knot, Sanderling, Whimbrel, Marbled Godwit, and Willet. Counts of Red Knots over the last decade indicate that 4-20% of the flyway population use the Seashore during migration; the Red Knot is currently being considered for listing under the ESA. Clearly, the Seashore is critical for maintaining populations of North American shorebirds.

We urge you to use the best available science in managing the balance between shorebird protection and human recreation on Cape Hatteras National Seashore. Ample evidence has documented the negative effects of off-road vehicles and associated human disturbances on shorebirds, other wildlife, and beach habitats. Scientific studies, reviews, and recovery plans have recommended specific actions necessary to protect shorebirds from the negative effects of ORVs and other human disturbance. In addition, scientists working for the U. S. Geological Survey (USGS) developed specific protocols for

management of some protected shorebird species on the Seashore. We urge you to strongly consider the guidance presented in scientific studies, conservation plans, recovery plans, and recommendations from experts as you develop the regulation for ORV use on the Seashore.

In 2005, the National Park Service asked USGS and independent scientists to develop specific protocols for the protection of nesting American Oystercatchers and Piping Plovers on the Seashore. These protocols present three levels of protection (high, moderate, and minimum) and the predicted effects on breeding shorebirds. Under the minimum level of protection, oystercatchers may become extirpated as a breeding species on the Seashore, and recovery of Piping Plovers will be slow. The moderate level also places species at risk, but the risk could be greatly reduced with intensive monitoring and immediate protective actions at the first observation of breeding behavior. The moderate level protects species within focal sites, but individuals that nest outside of these sites will be subjected to greater disturbance, including nests and chicks being crushed by vehicles and pedestrians, without intensive monitoring and immediate protective actions. In contrast, they conclude that the highest level of protection should result in limited direct recreational impacts.

If implemented, the USGS protocols would provide great improvements for nesting individuals, but would still fail to address protection for migrating and wintering shorebirds. These migrating and wintering species, their habitats, and food resources essential to meeting their energetic needs are jeopardized by ORV use. Audubon North Carolina has documented specific Seashore sites that receive high use by migrating and wintering shorebirds and these areas should receive high levels of protection.

We are aware that the National Park Service will soon release alternatives and a 'preferred alternative' for the Seashore's ORV management. This plan will determine whether or not sensitive species, such as shorebirds and other natural resources, are adequately protected within the Seashore. We request that the National Park Service protect breeding, migrating, and wintering shorebirds from ORV impacts by using the best available science and implementing no less than the moderate level of protection outlined in the USGS protocols. Equally important, we request that you protect key ocean beach and inlet areas, including associated moist substrate habitats, for migrating and wintering shorebirds.

Thank you for your consideration. Please contact Brad Andres, National Coordinator of the U.S. Shorebird Conservation Plan (303-275-2324; brad\_andres@fws.gov), if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Cecil". The signature is fluid and cursive, with the first letter of each word being significantly larger and more prominent.

John Cecil, National Audubon Society  
Chair, U.S. Shorebird Conservation Plan Council