



**NEW YORK STATE
ORNITHOLOGICAL ASSOCIATION, INC.**

for the birds and birders of New York State since 1948

US Fish & Wildlife Service
Arlington, VA

June 6, 2014

Re: Docket no. FWS-R5-ES-2013-0097
Proposed Threatened Status for the Rufa Red Knot

I am writing on behalf of our organization in support of the proposal to grant threatened species status to the Rufa Red Knot. The New York State Ornithological Assoc. is the umbrella group for bird clubs and numerous Audubon Chapters in New York State, representing 42 member organizations and over 600 individual members.

The dramatic decline in Red Knot populations is well-documented, and certainly provides sufficient cause for providing protection under the Endangered Species Act for this bird. There have been alarming drops in Red Knot numbers in New York and neighboring states which harbor critical stop-over feeding areas for this long-distance migrant. Members and member groups of our organization have observed the species for many decades and the decline in numbers has been apparent to us for several years now.

Observations such as these have been confirmed by many scientific studies, leaving little doubt that this is a species that deserves and needs recovery efforts that threatened species status can provide. In particular, stop-over feeding areas such as the horseshoe crab spawning grounds in Delaware Bay must be preserved in order for Red Knots to successfully reach their breeding territories. This is truly critical habitat that ESA designation can protect.

Other factors such as sea level rise and corresponding human actions to harden coastlines also have negative impacts on the species. These threats can be expected to increase in the future and it is most important to consider effects on Red Knots brought about by these changes. Threatened species status will help ensure that this is done.

We urge the Service to enact the threatened species proposal for Rufa Red Knot as soon as possible in order to provide the protections and help this imperiled species needs.

Sincerely,

Andrew Mason, Conservation Chair