



WHSRN Executive Office, 76 Emery Street, Portland, Maine 04102

8 July 2009

Jason Gipson
Army Corps of Engineers
Nevada-Utah Regulatory Branch
533 West 2600 South, Suite 150
Bountiful, UT 84010
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Dear Mr. Gipson,

We are writing to provide you with input from the Western Hemisphere Shorebird Reserve Network (WHSRN) about the Great Salt Lake Minerals Corporation (GSLM)'s amended permit application to construct the GSLM Solar Evaporation Ponds Expansion Project, identified in Public Notice SPK-2007-00121. The proposed expansion would add approximately 91,000 acres of solar evaporation ponds on the lake, impacting 80,000 acres of waters of the United States, including wetlands, in or adjacent to the Great Salt Lake in Box Elder County, Utah.

WHSRN is dedicated to the recognition and protection of critical habitats for migratory shorebirds and is overseen by the Hemispheric Council that comprises representatives from a number of nations in the Americas and beyond (a list is provided on the third page of this letter). WHSRN's mission is the conservation of shorebird species and their habitats through a network of key sites across the Americas. There are currently 77 sites, covering almost 30 million acres in 12 countries across the Hemisphere recognized by WHSRN.

The Great Salt Lake has been recognized since 1991 as a WHSRN "Site of Hemispheric Importance" (the highest of three categories), in large measure because of the presence of important numbers of Snowy Plovers, Wilson's and Red-necked phalaropes. The plovers are ranked as "highly imperiled" while the two phalarope species are identified as "species of high concern" in the U.S. Shorebird Conservation Plan. The U.S. DOI Bureau of Land Management, the U.S. Fish & Wildlife Service the State of Utah Department of Natural Resources are all among the federal, state and private land-owning entities agreeing to participate and to make the conservation of shorebirds a priority at the site.

Since becoming a WHSRN site, the Great Salt Lake has joined with sites at Chaplin/Old Wives Lake, Saskatchewan, Canada, and Marismas Nacionales, Nayarit, Mexico in an innovative "Linking Communities" project that has offered unique educational and conservation benefits at a continental scale. The partnership has even received significant financial support from Rio Tinto, the mining company.

We urge you to recognize that actions taken at the Great Salt Lake have consequences across the entire hemisphere. The entire world population of Snowy Plover is under 20,000 individuals. Both Red-necked phalaropes breed in the Canadian and Alaskan Arctic and migrate as far south as Peru. Wilson's Phalaropes breed across the Great Plains and also migrate to South America, in their case to Argentina. Management actions and habitat quality at key wetlands in any of these sites will affect biodiversity in all countries, as the role of shorebirds in various ecosystems is altered.

All evidence demonstrates that, for shorebirds like these, critical sites such as the Great Salt Lake are irreplaceable. Indeed, it was on this very principle that WHSRN was formed almost 25 years ago and it is the premise that the Utah Department of Natural Resources recognized in seeking recognition for the Great Salt Lake.

Inadequate protection of migratory birds and their habitats in the U.S., can reasonably be expected to weaken the efforts of others to undertake conservation across the Hemisphere. It would serve as an excuse for other governments who might be tempted to assign blame to the U.S. to avoid their own responsibilities.

A considerable body of scientific information now exists about habitat use by birds such as Snowy Plover, Red-necked and Wilson's Phalaropes (as well as American Avocets, Long-billed Dowitchers, "peeps," and other species that use the Lake). We are in regular contact with individual researchers and their home institutions across the Americas, as well as with the Council of the U.S. Shorebird Conservation Plan. We would be most pleased to help you engage this group and other sources of scientific information, to gain a clear understanding of the implications of this and any future activities you may be considering.

Please do not hesitate to be in touch with Charles Duncan, Director of WHSRN's Executive Office, cduncan@manomet.org, 207.871.9295, should there be any information or other assistance we can provide.

Yours truly,



Marshall P. Jones, Jr., chair
WHSRN Hemispheric Council



Charles D. Duncan, Ph. D
Director, WHSRN Executive Office

cc: J. Cecil, chair, US WHSRN Council



Members of the WHSRN Hemispheric Council

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