



613 RIVERSVILLE ROAD
GREENWICH, CT 06831
PHONE: 203-869-5272
FAX: 203-869-4437



2 THIRD STREET, SUITE 480
TROY, NY 12180
PHONE: 518-869-9731
FAX: 518-869-0737

March 17, 2016

Beth Goldstein, Natural Resource Planner
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035-9589

Re: Great Thicket National Wildlife Refuge Draft Land Protection Plan and Environmental Assessment

Dear Ms. Goldstein:

Audubon Connecticut and Audubon New York, state offices of the National Audubon Society, strongly support the proposal by the U.S. Fish and Wildlife Service (Service) to establish the new Great Thicket National Wildlife Refuge (NWR). We are state leading voices for the conservation and protection of natural resources for birds. Through land stewardship, science, education and advocacy, we work across state borders to preserve habitat and protect birds that are of state, national and global concern. A hallmark of Audubon's conservation efforts worldwide is our identification of Important Bird Areas (IBAs). Habitat loss is one of the main threats to endangered and common species of birds. We are committed to transforming our communities into places where birds flourish, because where birds thrive, people prosper.

The proposed Great Thicket NWR would include potential land acquisition areas in Connecticut, Maine, Massachusetts, New Hampshire, New York, and Rhode Island. The proposed land acquisition focal areas were carefully selected to correspond with areas where a matrix of forest and early successional habitats are most likely to be successful at positively impacting declining shrubland and young forest species, while also supporting a healthy contingent of forest-interior nesting birds. The Service would be authorized to work with willing landowners within the selected land acquisition focal areas who wish to sell or hold conservation easements on their lands. Acquisitions will only take place where there is a willing landowner and sufficient funds are appropriated to purchase the properties in fee or easement.

We are excited by the prospect of the Service going beyond land acquisition in this initiative by directing funding and assistance to private landowners who would like to improve habitats on their lands, but wish to retain ownership of their properties. Service staff and partners could assist private landowners with applying for federal grant programs such as the USFWS Partners for Fish and Wildlife Program and the Department of Agriculture's Natural Resources Conservation Service conservation title programs to facilitate conservation funding efforts within the focal areas. Having well-defined focal areas can also assist with prioritization efforts and direct funding to the areas where they will have the greatest effect. Additionally, Audubon Connecticut would use the proposed focal areas in Connecticut as a way to

prioritize funding from programs such as our Connecticut In Lieu Fee (ILF) Program.¹ Official focal areas as represented by the proposed acquisition boundaries will help to evaluate and prioritize appropriate projects as they are submitted through the ILF Program. We would also take these focal areas into account when we select where we implement programs such as our Healthy Forest program and our efforts to improve habitats for successional species on working lands. The synergies with this proposed Refuge and our existing conservation priorities will offer exciting opportunities to coordinate and leverage our efforts in protecting habitat in the Northeast.

No other group of birds in the Northeast is in more need of conservation action to reverse declining trends than shrubland birds. Over the past century, many shrublands and young forests across the Northeast have been cleared for development or have grown into mature forests. Populations of shrubland birds have correspondingly declined at alarming rates in recent decades and this proposal would be a key action step for helping to protect priority species such as Prairie Warbler, Chestnut-sided Warbler and American Woodcock. Despite significant progress in restoring and protecting shrublands and young forest throughout the Northeast, Audubon strongly believes that more permanently protected and managed land is needed to restore wildlife populations and return balance to Northeast woodlands. The Great Thicket NWR would improve habitat for Blue-winged and Prairie Warblers, Ruffed Grouse, and a wide variety of other shrubland species, while also helping to protect forest birds such as Cerulean Warbler, Wood Thrush and Scarlet Tanager. Additionally, research has shown that forest interior species utilize areas of early successional forest as foraging areas, particularly in the post-fledgling season², so the new Refuge would benefit multiple groups of birds and other wildlife.

The Northeast comprises some of the highest human population concentrations in the country and there are limited opportunities for the public to access federal lands for wildlife associated recreation. The proposed Refuge would open up properties to public access helping to address this need. Audubon looks forward to working with the Service to improve public access opportunities on the proposed Refuge, particularly in the Tenmile River Watershed area along the border of New York and Connecticut, where the Audubon Sharon educational facility is located. The Sharon Audubon Center could serve as a gateway to the Great Thicket NWR. We currently provide environmental education services to approximately 16,000 community members annually and the largest wildlife rehabilitation unit in Northwestern Connecticut spotlighted by wild bird aviaries that are home to 20 non-releasable raptors. The Sharon Audubon Center and the Emily Winthrop Miles Wildlife Sanctuary have been connecting people with nature for over fifty years and are in the heart of the proposed Refuge. We manage 3,000 acres of diverse habitat including shrublands, upland hardwood forests, hemlock ravines, wooded swamplands, three large ponds, open fields, and various riparian corridors exemplified by two miles of the Carse Brook Wetlands that supports a wide variety of flora and fauna. Our sanctuaries boast some of the best wildlife viewing in the region and are accessible with over 11 miles of trails. Audubon Sharon is the hub for our “Healthy Forest” work in Connecticut providing private landowners habitat management advice and we are considering implementing an early successional demonstration cut in 2016.

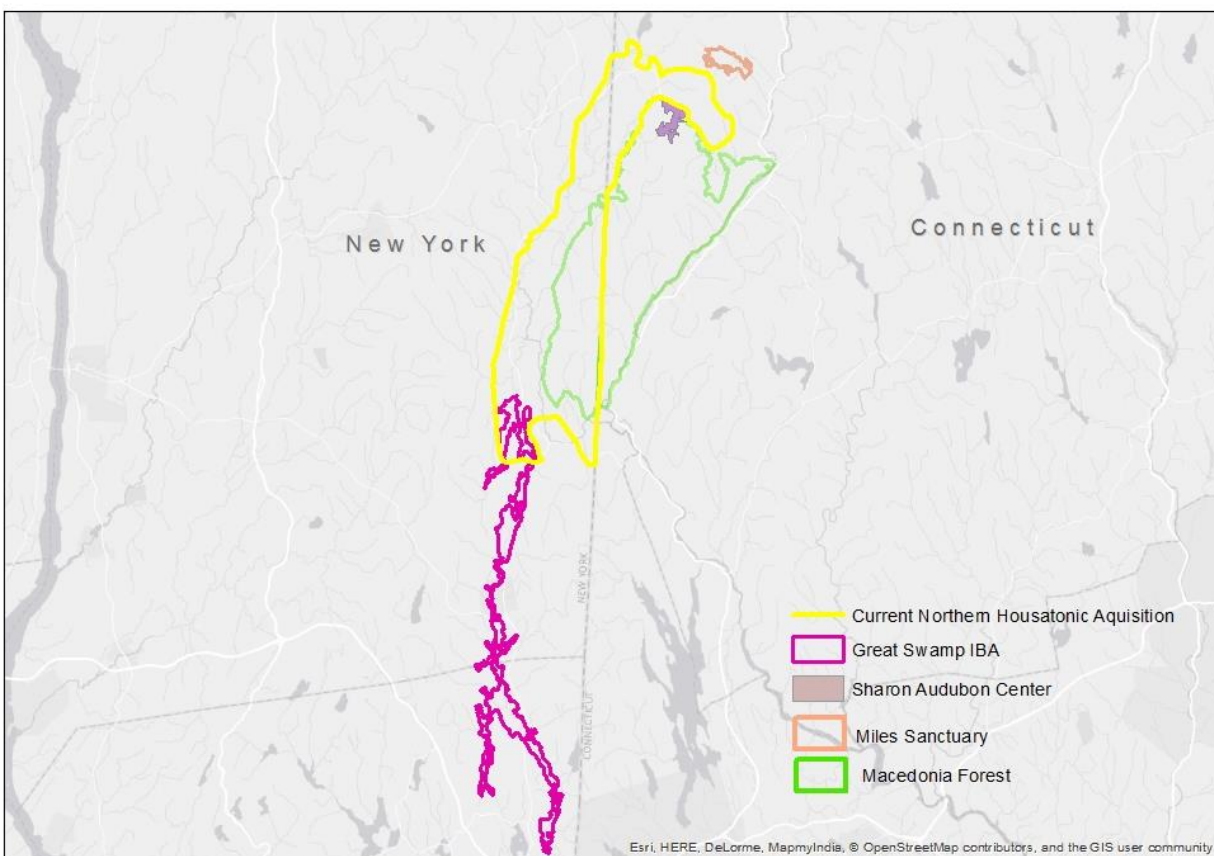
National Wildlife Refuges not only provide a boost to wildlife, they are strong economic engines for local communities across the country. A 2013 national report entitled “Banking on Nature” found that refuges provide \$2.4 billion into the economy nationwide and support more than 35,000 jobs. Spending by refuge visitors generated nearly \$343 million in local, county, state, and federal tax revenue in 2011.

¹ The ILF Program was created to help compensate for unavoidable impacts to protected aquatic and estuarine resources in the state by funding the restoration, enhancement, preservation, and creation of similar resources in order to replace or maintain ecological benefits compromised by various activities. The National Audubon Society, Inc., through its Connecticut program (Audubon Connecticut) is the sponsor of an In- Lieu Fee Program for aquatic resource compensatory mitigation required by Department of the Army authorizations.

² Stoleson, Scott H. 2013. “Condition varies with habitat choice in postbreeding forest birds.” *The Auk*. 130(3): 417-428.

Recognizing that there can be a tax loss when placing land in government ownership, the Service offsets this loss by annually contributing funds through the Refuge Revenue Sharing Program to the county, municipality, or other local unit of government that might be impacted by any loss of local property tax revenue. These additional considerations will ensure broader public support for the proposed Refuge.

We strongly recommend an expansion of the potential acquisition boundary to include additional priority areas in New York and Connecticut (see Map 1). We propose expanding the boundary to include the large forested landscape south of the 1,150-acre Sharon Audubon Center known as the Macedonia Forest. Much of this landscape is privately owned and including it within the acquisition boundary would offer more options to private landowners who wish to see their lands conserved in perpetuity through sale in title or easement form. The Macedonia Forest has been identified by The Nature Conservancy as a matrix forest, has been found by Connecticut's Important Bird Areas (IBA) Technical Committee to meet the criteria as an IBA, and was recently identified as a potential climate stronghold for shrubland and young forest birds during a mapping exercise Audubon CT conducted utilizing data from Audubon's Birds and Climate Change Report (<http://climate.audubon.org/>). In addition, Audubon Connecticut would be thrilled to have our own lands included within the acquisition boundary. Finally, in New York the proposed acquisition boundary includes the northern reaches of the Great Swamp, a site recognized as an IBA by Audubon and BirdLife International. We would like to see the acquisition boundary expanded to include the majority of this IBA to complement the conservation efforts that are currently taking place in this area. Expanding the acquisition boundary would offer the Service more flexibility to respond to the desires of landowners by offering additional sale options that would preserve the land they care so deeply about. Since there will be no restrictions associated with private lands being included within the acquisition boundary it will only offer willing landowners more options if they seek to conserve or improve management on their properties.

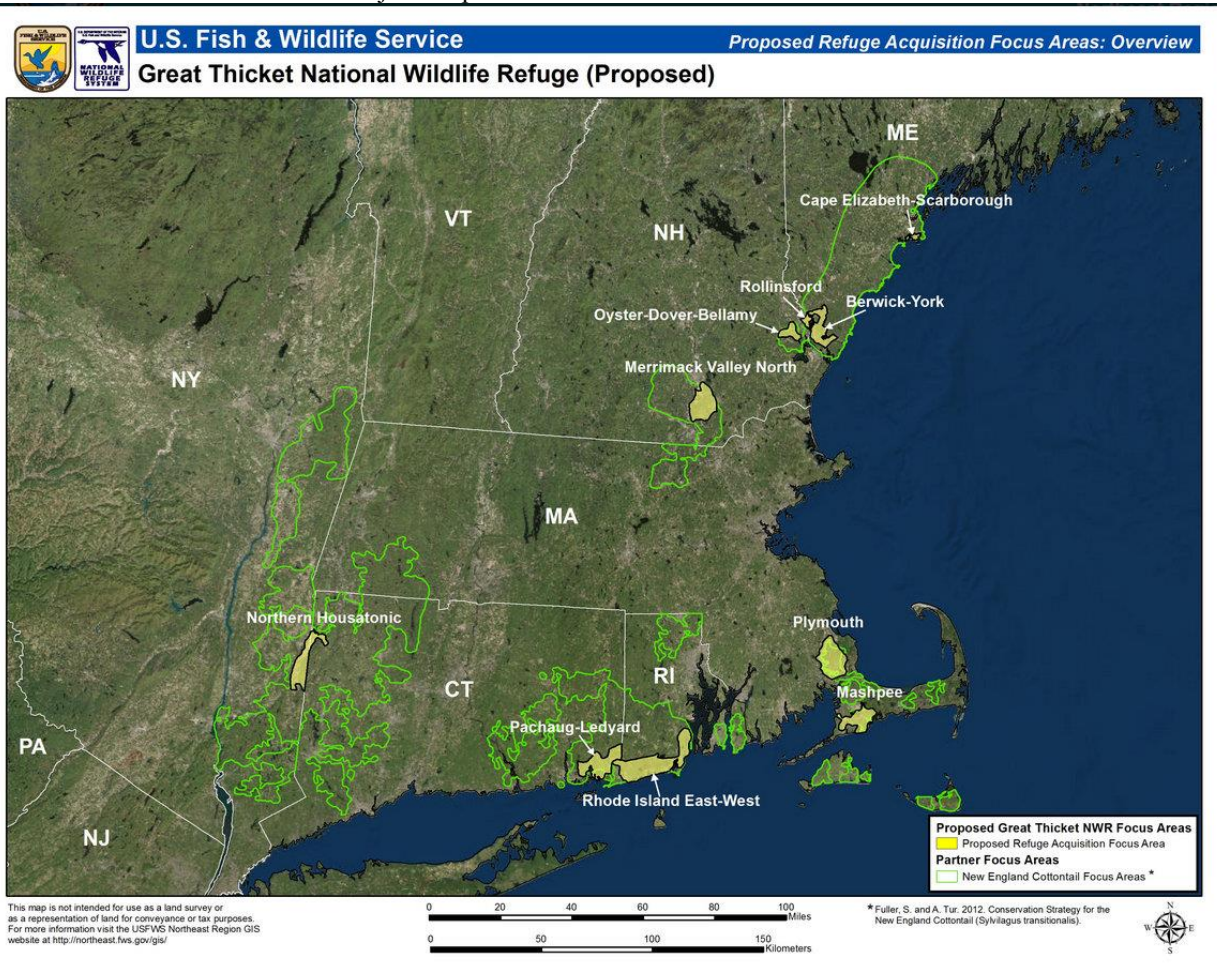


Map 1: Audubon supports expanding the Northern Housatonic Acquisition Boundary to include additional priority areas

Forested lands within the focal areas should also be a target for conservation efforts under this proposal. We strongly believe a large forested landscape is critical to any effort to improve and manage habitat for shrubland birds and other early successional wildlife species³. Working within a large forested landscape would offer more flexibility for rotational management and provide a rich variety of natural successional states that will benefit both young forest and forest interior species and accommodate species that require multiple successional stages of forest during their lifecycle. Birds nesting in shrublands within a forested matrix would also be less susceptible to cowbird parasitism and predators associated with residential development.

We also strongly suggest that the Service consider all of the existing New England Cottontail Focus Areas as Conservation Partnership Areas in the planning for this new Refuge (see Map 2), allowing wider efforts to conserve shrubland birds and other early successional species in partnership with private landowners and other conservation partners in areas already identified as a high priority for this group of species. We would also strongly recommend any adjacent and/or proximal powerline corridors be included as Conservation Partnership Areas to offer the Service flexibility to support long-standing efforts by landowners and conservation groups to manage these areas for the benefit of shrubland birds and other successional wildlife species.

³ Askins et al., 2012. "Effects of Vegetation, Corridor Width and Regional Land Use on Early Successional Birds on Powerline Corridors". PLOSone. DOI: 10.1371/journal.pone.0031520



Map 2: Proposed Great Thicket NWR Focus Areas and New England Cottontail Focus Areas

Conservation Partnership Areas were a concept developed in the draft Comprehensive Conservation Plan for the Silvio O. Conte National Fish and Wildlife Refuge whereby the Service is authorized to work on a wide variety of conservation efforts with private landowners. Acquisition is not the primary focus within these areas, but can occur in instances when an opportunity to conserve a key conservation asset arises and landowners are seeking to sell their lands for conservation purposes. This approach offers more flexibility when working with willing landowners on conservation of lands and habitat management to improve habitats for forest and successional birds, and we think it would be a positive addition to the proposed Great Thicket Refuge.

Audubon also requests that the acquisition boundary in the area of the Connecticut/Rhode Island border be expanded along its northern border as suggested by the Avalonia Land Conservancy and that the Service work with the Conservancy to implement their suggested boundary changes. This would allow the Service to assist with and support critical and ongoing conservation activities in this area, including the Avery Farm and Lamb Farm projects of the Conservancy.

Finally, we hope that the Service will provide adequate resources towards the ongoing management needs of any lands acquired as part of this new Refuge and ensure adequate funds are provided at the earliest possible time to respond to current conservation opportunities. We also recommend that the Service model the mission of the Refuge after the legislated purposes of the Silvio O. Conte National Fish and Wildlife Refuge. This would allow for tremendous flexibility to work in areas not owned by the Service, to work with easements in addition to fee title purchases, and to support conservation efforts through innovative approaches at a landscape scale.

Thank you very much for the opportunity to provide comments on this exciting proposal. We look forward to continuing to work with you.

Sincerely,



Erin M. Crotty
Executive Director, Audubon New York



Stewart J. Hudson
Executive Director, Audubon Connecticut