The Position of the
Mattabeseck Audubon Society
with regards to
the Establishment of
The Silvio O. Conte
National Wildlife Refuge

Title: The Position of the Mattabeseck Audubon Society with

regards to the establishment of the Silvio O. Conte National

Fish and Wildlife Refuge.

Biome: River Basin, consisting of the main stem of the Connecticut

River, its numerous tributaries, alluvial flood plains, marshes,

swamps, islands, sandbars, fresh and estuarine tidal

marshes, and upland buffer areas.

Reviewed

by: The Mattabeseck Audubon Society.

1. Introduction:

The Mattabeseck Audubon Society strongly supports the ecosystem concept of the Silvio O. Conte National Wildlife Refuge. A refuge that is reflective of the aims of a unified program of fish and wildlife management that embodies the entire Connecticut River Drainage Basin, about 11,250 square miles, as set forth in the Silvio O. Conte National Fish and Wildlife Refuge Act is significant in that it approaches conservation in a scientifically sound manner. Each part of the Basin is inextricably related to the whole. The Connecticut River is nothing more than the sum total of its tributaries, wetlands, and floodplains. The biodiversity of the Basin is its most valuable asset and it is most vulnerable to unwise development. The concept of an ecosystem-based wildlife refuge provides a secure future for flora, fauna, and people as well. Economic and agricultural development that sustains rather than destroys the natural resource will take precedence.

The Mattabeseck Audubon Society has been actively involved in protecting the floodplain and wetlands of the Connecticut River Basin through regulatory intervention at the state and local level whenever unwise development is proposed. The Mattabeseck Audubon Society has also participated in water monitoring programs to help develop state-wide non-point source pollution management strategies. A designated National Wildlife Refuge in the Basin will "even the odds" in favor of conservation. It is crucial that legitimate concerns be satisfactorily and expeditiously addressed so that the project can move forward.

2. Objectives.

Of special concern is the protection of habitat for over 200 species of rare and endangered animals. The U.S. Fish and Wildlife Service should:

- Develop and implement a "Species Recovery Plan" for the most seriously impacted species.
- Continue assessing the number distribution, population structure, taxonomic status and conservation requirements of the wildlife of the Connecticut River Drainage Basin.
- Using information compiled in the natural surveys, map out core areas in the Basin where acquisition through purchase of property, conservation easements, and development rights would be focused. Buffer zones could be protected through a combination of voluntary registration of land where owners would notify the U.S. Fish and Wildlife Service before selling or developing their property, and conservation easements.
- Establish information billboards at the entrances to core areas for the general public with respect to the biodiversity assessment of the core.
- Work with the respective Departments of Environmental Protection in the states within the Basin to educate the public to recommended conservation and management practices.
- Institute a comprehensive management plan that would clarify the purpose
 of the National Wildlife Refuge; establish a formal process to review the
 compatibility of refuge uses; ensure that actions of other Federal and state
 agencies do not impair refuge resources.

The U.S. Fish and Wildlife Service is not a regulatory body. However, the scientific expertise of the service should be unequivocally available to state, local, and citizen activists when regulatory hearings require it. This expertise may be presented in person or in the form of letters written in behalf of interested parties. This is an important departure from normal operating procedure, whereby the U.S. Fish and Wildlife Service acts primarily as a consultant for the EPA, U.S. Corps of Engineers, and other federal bureaus.

There must be a mechanism whereby conflicting scientific review of development or of management policies affecting the refuge can be resolved other than by lawsuits. The ability of the petitioning party to commence hearings at the local level presided over by an impartial adjudicator would ensure that scientific principles would not be biased by political concerns.

3. Justification.

- Many species of animals in the Connecticut River Basin are declining due to development. Former breeding populations of certain birds and fish are virtually non-existent.
- Until recently there have not been detailed ecological surveys of the Basin.
 Present conditions may be hampering rich faunal communities from developing.

4. Urgency.

- Delay in implementing a natural areas protection plan may mean further losses.
- Conservation efforts after species loss is always more costly than preventive measures.

5. Feasibility.

- The U.S. Fish and Wildlife Service has been mandated to act by Congress.
 The Service seems receptive to proposals for conservation from a wide range of non-governmental groups.
- There are a variety of environmental groups consisting of professional resource specialists and experienced amateur naturalists already making significant contributions to the conservation of the Basin's natural areas. These talents would be available to the U.S. Fish and Wildlife Service.

Recommendations.

Mattabeseck Audubon strongly suggests that the U.S. Fish and Wildlife Service combine certain aspects of Alternative D. with the specific land protection goals

and expanded facilities development of Alternative E. to become the proposed action framework for the establishment of the Silvio O. Conte Wildlife Refuge. MAS will refer to this combination of alternatives as "Alternative F."

Alternative F. Private Lands Work, Education, Partnerships and Land Protection.

Under this alternative the Fish and Wildlife Service would work with both private land owners, state or local agencies and private organizations through the existing Partners for Wildlife and Challenge Cost Share Programs. The Service's major thrust would focus on voluntary efforts, developing partnerships, providing an expanded technical assistance, coordination, and educational role and have an expanded Partners for Wildlife Program and Challenge Cost Share Program for state and local agencies and private organizations. By emphasizing the watershed-wide cooperative management and educational program aspects of Alternative D. with the Special Focus Area protection goals of Alternative E., the Service will most successfully achieve the mandates of the Silvio O. Conte National Fish and Wildlife Refuge Act of 1991.

Since the expanded cooperative arrangements, Challenge Cost Share Programs, and programs combining educational efforts and the provision of management grants will be an intrinsic part of Alternative F., the costs of protecting and managing Special Focus Areas will be lessened because the responsibility will be shared among many cooperatives. Under Alternative F. 100% of the identified Special Focus Areas in the Connecticut River Watershed will be protected. The Service will not be responsible for acquiring all the presently unprotected acreage in the Special Focus Areas, but will be responsible for any shortfall.

For example, in Alternative D., 76,185 acres would be protected, 25,680 acres by the Service. In Alternative F., 130,420 acres would be protected, but the Service would be responsible for acquiring only 79,915 acres, 25,680 acres that would be protected in Alternative D. plus 54,286 acres, or the shortfall in acres protected from Alternative D. to Alternative E.

Total Unprotected Special Focus Acreage needed to be protected	130,420
Total Unprotected Special Focus Acreage to be protected	
in Alternative D.	76,185
Shortfall	54,285
Service protected acreage in Alternative D.	25,680
Total Service protected acreage in Alternative E.	130,420
Total Service protected acreage in Alternative F.	(54,285 + 25,680) = 79,915
Total Savings to Service in acreage protected in Alternative F.	50,505

This represents a conservative figure, since cooperatives are expected to protect a certain percentage of the 54,285 acre shortfall from total Special Focus Area acreage needing protection (130,420) and Special Focus acreage protected in Alternative D. (76,185).

The expanded cooperative efforts of Alternative F. will allow more protection of Special Focus areas *without*

- a prohibitive level of Federal spending
- duplication of efforts
- competition of existing environmental education providers
- limiting coordination with other organizations
- limiting funds for partnerships

Alternative F. will also enable the Service to concentrate its management resources on its Fee Title acquisition sites, while expanded cooperative agreements would maintain control over the multitude of scattered sites for special protection.

Conclusion:

- Mattabeseck Audubon Society recommends the blending of the positive aspects of both Alternative D. and Alternative E. to form the proposed action, Alternative F.
- Alternative F. is more responsive to the purposes of the Silvio O. Conte
 National Fish and Wildlife Refuge Act of 1991 than any of the other (5) five
 alternatives. The U.S. Fish and Wildlife Service's efforts to implement the
 Act's purposes while controlling costs will be greatly enhanced by choosing
 Alternative F.

7. Success Indicators.

- Reduction of further habitat destruction and conflict between users of the natural resources of the Basin.
- Improvement in the conservation status of fish and wildlife populations.
- · Implementation of a long term study, conservation and management program.

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