



NEW YORK STATE ORNITHOLOGICAL ASSOCIATION, INC.

for the birds and birders of New York State since 1948

Lia McLaughlin
Refuge Planner
USFWS Northeast Regional Office
300 Westgate Center Drive
Hadley, MA 01035

June 29, 2012

Dear Ms. McLaughlin:

I am writing on behalf of the New York State Ornithological Assoc., Inc. regarding the Draft Comprehensive Conservation Plan/Environmental Assessment for the Montezuma National Wildlife Refuge. Please consider this letter as formal comments on this document.

Our organization is the umbrella group for bird clubs and a number of Audubon Chapters in NY State. We represent 46 member organizations and 700 individual members. Montezuma National Wildlife Refuge is well-known and supported by our member clubs and individual members, and is one of the locations most visited by the birding community in New York.

I must start by expressing our disappointment in the lack of opportunity for public comment on the Montezuma CCP. Our organization did not learn of the draft plan and the comment period until shortly before the only public hearing. It was impossible for us to adequately inform our members and member organizations to allow them to digest this sizeable document and prepare substantive comments. Likewise, it was very difficult for us to prepare these comments, and they are brief and less detailed than we would have provided if sufficient time was available. Our request for additional time for comments was denied, with only a short informal extension allowed.

We request that an additional comment period be opened for this document. Considering the time and effort put into the plan, and it's importance as a guide for the refuge for the next 15 years, adequate opportunity for public involvement is essential, and in the spirit of the National Environmental Policy Act.

Comments on the Draft Comprehensive Conservation Plan

One item in the plan that we have great concern about is the disproportionate emphasis on increasing sport hunting for recreation and as a proposed management tool. Sport hunting may have a clear impact on other refuge visitors through disturbance of non-target waterfowl and other species. Spring hunting for Snow Goose is particularly problematic in this regard. While we recognize the financial and other contributions sport hunters have and are making to the National Wildlife refuge system, we feel the preferred alternative is unbalanced in regard to user groups. In particular:

- Based on your own figures in the plan, non-hunting visitors greatly outnumber sporting visitors. Any action that impacts this user majority must be carefully assessed.
- A spring Snow Goose hunt will disrupt local waterfowl movement patterns and possibly those of other species. While the goal of limiting populations of this species to reduce damage to Arctic habitat is laudable, the cost/benefit ratio of this management practice is highly questionable. Sport hunting has proven highly ineffective for reducing Snow Goose populations to date and targets in the plan are unrealistic. If a flyway wide population reduction, with a Montezuma NWR component, is the management goal this method is highly unlikely to succeed. The costs of disturbance to other species and reduction of viewing opportunities for other visitors presents a very poor cost benefit ratio.
- While the proposed resident Canada Goose hunts may have a higher likelihood of management success, problems are present in this strategy. Using the refuge as a major component in statewide population reduction is unreasonable. Existing techniques of egg oiling etc are a far more effective technique in a managed area and should be the priority for cooperative action in the Montezuma complex.
- We strongly recommend that the excessive emphasis on hunting as a management tool be revisited. By your own figures efforts such as youth hunting and development of handicapped accessible blinds are meeting with limited success in increasing hunter participation. It is time that wildlife managers faced the reality of changing demographics of an ageing and declining hunter population. Over the fifteen year life of this plan there is no reason to assume a reversal in this trend. Therefore the development of new Management Techniques and adjustment to new paradigms is essential. These elements of the current plan represent and attempt to use 20th century techniques in a 21st century world.
- Expansion of deer hunting to Sunday again favors the hunting public over other users. Many non-hunters avoid hunted areas when deer hunting is actively occurring, so Sunday is a day these users can fully enjoy these resources. Again sport hunting is not effective in many areas at reducing the critical over population of white-tailed deer. From a management standpoint state and federal officials should work together on developing effective overall management in the Montezuma complex. There is a clear need to reduce the abundance of this species but knee-jerk reliance on sport hunting is likely to fail to meet population targets if these have been developed.
- The hunting portion of the preferred alternative should not be adopted at this time. Further consideration of all aspects of these management strategies is required. More widespread consultation with regional and statewide user groups as of all types is essential. Pending such consultation and revisiting of these matters, the hunting aspects of the No Action alternative should be employed.

We are concerned over the planned management changes to refuge habitats under Alternative B. These changes would increase forested areas, while reducing shrub lands and grasslands.

Currently, forested lands occupy a much larger proportion of the refuge than shrub lands and grasslands—by a ratio of 4.5:1. The proportion of forest to shrub/grasslands would rise to 6.5:1 under Alternative B.

The justifications for this change include increasing habitat for such species as Cerulean Warbler, Wood Thrush, Wood Duck and bats. Although there are region-wide threats to these species, only Cerulean Warbler is considered at risk in NY State, and the marginal increase in refuge forest is unlikely to significantly improve numbers of this species on the site. Regarding bats, it is well-documented that rapid declines in bat populations are a result of white-nose syndrome in bat hibernacula. Again, it is highly unlikely that adding a relatively small area of forest lands will significantly aid bats.

On the other hand, a large group of birds utilizing shrub and grasslands would be negatively impacted by the 25% decrease in these habitats envisioned in the Plan. As recognized in the document, these include such at risk species as Northern Harrier, Short-eared Owl, Blue-winged Warbler, Bobolink, Upland Sandpiper, Sedge Wren, among others. The relatively small area of the refuge that is managed for these species is disproportionately important to their success. Reducing these habitats by 25% is not warranted, and in fact, we would urge consideration of actions to increase shrub/grassland habitats on the refuge, both by limiting forest succession, and by managing marginal marshlands to provide these habitats.

We do support the plan's goals of increasing the refuge's approved acquisition boundary, as well as increased land acquisition within the Montezuma Complex. Again, we would urge utilizing a significant portion of any suitable acquired lands for shrub/grassland habitat.

We also support continued coordination with other agencies and partners in maximizing resources in acquiring and managing lands within the Montezuma Complex. This effort is a good model for other similar partnerships. Restoration and management of agricultural and developed lands will enhance the refuge as well as lands owned by NY State and other entities.

Again, we urge reopening of the public comment period on the Montezuma CCP to allow the many other concerned individuals and organizations to participate in this important process.

Sincerely,



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