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**Comments of the Audubon Society of Northern Virginia
April 30, 2007**

On the Comprehensive Conservation Plan for the Elizabeth Hartwell
Mason Neck and Featherstone National Wildlife Refuges

Thank you for the opportunity to submit these comments on behalf of the 3,500 members of the Audubon Society of Northern Virginia, an organization whose mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.

We commend the U. S. Fish and Wildlife Service for preparing comprehensive conservation plans for the nation's refuges and we look forward to assisting FWS managers in selecting the best alternatives. We appreciate the opportunity to attend the March 28 scoping meeting and to talk with refuge officials.

Because habitat destruction is the leading threat to biodiversity in this country, the U. S. Department of Interior's public lands and habitat conservation programs – parks, refuges, wildernesses, seashores and others -- are critical.

The Context: Local Threats and Degradation

For the area's refuges, it is important to understand the local natural resource context of Fairfax County:

- *Unhealthy streams:* 80 percent of the county's streams were in fair to poor condition in 2006, up from 70 percent in 2005.
- *Unhealthy river:* The Potomac River got a C+ for its health in 2006 (Interstate Commission on the Potomac River.) Parts of the river are on the U. S. Environmental Protection Agency's impaired rivers list.
- *Unhealthy Bay:* The Chesapeake Bay got a grade of D+ for 2006, by the Chesapeake Bay Program.
- *Unhealthy air:* Fairfax County does not meet federal ozone and particulate air quality standards.
- *Trees lost:* The county's tree cover has plummeted from 75 percent in the 1970s to 40 percent today, according to the Fairfax County Urban Forestry Division. American Forests recommends

that suburban residential zones have at least 50 percent tree cover because tree cover is directly related to environmental quality and a sound “green infrastructure.”

- *Wetlands lost:* Development and other activities have destroyed most the county’s wetlands so that less than half of one percent of the county is wetlands, in a state that has lost almost half its wetlands.
- *Sprawl Spoils:* Sprawl and impervious surfaces expand inexorably and destroy resources, fragment habitat and send pollutants to our waters
- *Little left:* Fairfax County, at one million people and 407 square miles or 260,480 acres, is reaching “buildout,” with /// left. Parks and natural areas constitute only 9.4 percent of the county.

Health of Habitats

We strongly urge you to conduct complete assessments of the health of all the habitats in the refuge. Only by knowing the current state of our resources can we prepare plans to improve and maintain their health. We hope, for example, that you will conduct regular biological surveys of birds, other wildlife, forests, native plants and non-native plants and assess water quality.

Invasive Plants and Animals

Non-native species, especially plants, are the second-leading threat to endangered species, following habitat destruction. They compete with native species and usually can out-compete native species. Plants like English ivy, Japanese honeysuckle and porcelain berry are common in northern Virginia. The northern snakehead fish appears to be proliferating in the Potomac River. We urge you to include as a major element of your plan (1) identification of all non-native species on the refuge, (2) a comprehensive plan for addressing them and (3) an estimate of the resources needed to implement these plans.

Biodiversity

Our country is blessed with a diverse array of life, a valuable genetic richness. Among all the states, Virginia is considered by the Nature Conservancy to be the 12th in biodiversity and the 16th state in risk level. Any conservation plan must seek to maintain and restore biodiversity and minimize monocultures. We applaud, for example, your deer management program and hope that it and similar programs can be undertaken to protect and restore the refuge’s biodiversity.

Wetlands

Half of the country's freshwater wetlands have disappeared since 1780 because of conversion to development or farming. Wetlands are among nature's most dynamic natural systems and Mason Neck has one of the state's premier freshwater wetlands and the largest in Northern Virginia. We urge you to examine current threats to the wetlands and pursue any opportunities to restore lost or damaged wetlands.

Bald Eagle Protection

Mason Neck Wildlife Refuge was the first refuge specifically designated to protect the endangered bald eagle. Given the importance of the refuge and its shorelines to bald eagles, we encourage you to include in your plan, specific steps to maintain and stabilize the refuge's entire Potomac shoreline. We also urge a broad definition of habitat, in your efforts to protect bald eagle habitat, to include nesting, roosting, fishing and foraging – all habitat used by eagles. This is especially important if the bald eagle is downlisted under the Endangered Species Act and if that results in less strenuous enforcement and protection for taking or disturbing bald eagles.

Other Birds

Because birds are a signal of the overall health of the planet, we believe special attention should be given to birds. Many species are at risk. For example, the numbers of pine siskins have dropped by more than half. At 14 million, there are about half as many wood thrushes as there were 40 years ago. Many warbler species are in decline.

Many water-dependent birds are at risk. The northern pintail numbers have dropped by 63 percent. The U. S. Shorebird Conservation Plan lists the American Woodcock as a "species of high concern," because of declining population trends and threats to breeding and non-breeding grounds.

"Threats to avian life in the United States are many, but the most serious is the outright loss of habitat due to poor land use, the clear-cutting of forests, the draining of wetlands, and sprawl," reports the National Audubon Society. "Even when habitat is not totally lost, it is

being degraded by poor agricultural practices, bad forestry practices, excessive water diversion, unsustainable mining and drilling, pollution, exploitation of resources (particularly commercial over-fishing), and invasive non-native species (which include predators, plants, insects, diseases, and even other birds).”

These disturbing trends and facts point to the critical importance of strong conservation, restoration and stewardship of our refuge resources that provide habitat for birds. For example, most of the eastern United States’ woodlands have been destroyed or compromised, a fact that makes the refuge’s forests are especially critical.

Human Activities

Given the fragility of many of our natural resources, we urge that refuge managers allow only passive recreational activities on the refuge and its adjacent waters. If actions are required by the states of Maryland and Virginia to establish, for example, no wake zones or to ban jet skis near the refuge and in its wetlands, we stand ready to work with you to put policies along those lines in place.

Local Coordination

Given the problems cited above, we urge FWS managers to coordinate closely with local governments in, for example, their land use, transportation, parks and other planning. Fairfax County is currently preparing watershed plans for all of its 30 watersheds, which presents an excellent opportunity for the FWS to influence local policies that will directly affect the refuge. In 2008, work on watershed plans for Mason Neck’s watersheds will begin.

Comprehensive Coordination

Since nature – birds are a good example -- does not “respect” political boundaries, we strongly urge that refuge managers coordinate plans and enforcement with other federal, state and local agencies. Mason Neck is unique in northern Virginia for its large tracts of conservation lands protected by Fairfax County, the state of Virginia and other agencies of the federal government. And just across the Occoquan River, are other parts of the Potomac River Wildlife Refuge complex. All of these units should plan together so that protection of our natural resources is consistent throughout the area. We urge you to prepare

interagency agreements if necessary to effectuate this kind of cooperative planning and administration.

Built Infrastructure

Given the degraded health of our waters, in building or remodeling any of the built infrastructure on the refuge, we encourage you to use only low-impact development techniques, LEEDS-certified "green" buildings, natural landscaping, native plants and especially to avoid increasing impervious surfaces.

