



# Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

October 13, 2006

MA SubCouncil  
Housatonic River NRD Fund  
c/o Woodlot Alternatives  
30 Park Drive  
Topsham, ME 04086

Dear Trustees;

We would like to respond to the thoughtful comments presented by the reviewers of the Natural Heritage & Endangered Species Program's proposal "**Rare Species Recovery on the Housatonic River**".

**1. Concern that the marble valley extends beyond our delineated Critical Supporting Watershed and that the tighter focus of the NHESP project, as presented, will miss ecologically important areas:**

NHESP used the Critical Supporting Watershed (CSW) model to focus survey and prioritization efforts, as the resources within the CSW are most closely tied to the Housatonic itself. Funds are a limited resource, and to maximize benefit to the injured natural resources, we felt that it was best to focus work in areas most closely linked to the Housatonic River itself. NHESP certainly recognizes that the areas highlighted by the reviewers, Schenob Brook and the Green and Williams Rivers, are of high ecological importance. However, to best serve the injured resources, we focused on a more narrowly defined region associated with the Housatonic River main-stem and major tributaries.

**2. Cooperation with NGOs and the USFWS:** On page 5 of our proposal we state that we will "contact appropriate groups in the area to ensure that there is no duplication of survey effort. For example, there are ongoing turtle surveys..." This refers to the federally listed Bog Turtle. We were not explicit in referencing groups such as The Nature Conservancy or Mass Audubon; however, we certainly plan to coordinate survey efforts with the U.S. Fish & Wildlife Service and biodiversity conservation non-governmental organizations (NGOs).

**3. Permits:** Our proposal seeks to inventory and clearly prioritize sites, based on the updated information, for subsequent restoration and acquisition. The Phase II Proposal from Natural Heritage may well include permitted activities. As we are not planning on any restoration at this time, including pesticide application, we felt that it would be most appropriate to address these questions during the next round of proposals.

**4. Lack of Land Acquisition Targets:** We plan to take the next two years and, through well-defined survey and planning efforts, find and prioritize acquisition targets to be proposed in Phase II. BioMap and Living Waters Core Habitats are good starting spots, but we think there is a need first to update our records (35% of which are historic) within this narrow region along the Housatonic River and its main tributaries to ensure that our next proposal in Phase II will be as well informed and focused as possible.

**5. Restoring Extirpated Populations:** Reintroducing extirpated populations is usually a very time intensive and costly approach with uncertain results which should be measured over a long time frame. We feel that the best approach for recovery is to protect established, nearby populations as reservoirs for natural recolonization. Additionally, the life-history requirements necessary for the successful reintroduction of many state-listed species are unknown.



## Natural Heritage & Endangered Species Program

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6. **Addressing current threats:** Reviewers raised the question of describing and abating threats such as ATV use and invasive species. We agree that both can be great threats, however, abatement, beyond our ongoing implementation of MA Endangered Species Act regulatory protections, is largely outside of the scope of this Proposal. Abatement is stated to be addressed in Phase II. It should also be noted that we will identify site-specific threats during the course of our field surveys.

7. **Overhead cost:** We fully understand this point and would like to significantly reduce overhead costs. We are currently exploring ways to avoid or reduce the agency's 34.16% overhead cost rate.

Thank you very much for the opportunity to comment. We hope that our public comments letter clearly addresses the questions raised by the reviewers.

Sincerely,

Henry L. Woolsey  
Program Manager  
Natural Heritage & Endangered Species Program