# Appendix G Public Comments

This appendix details those comments received in response to the draft SWAP 2015 that elicited a response from DOEE. Section G.1 includes several extensive comments from residents. Section G.2 includes comments from stakeholder organizations. Section G.3 includes a summary of comments from residents and stakeholder organizations that addressed language in the draft SWAP 2015 about free-roaming cats. In all sections, DOEE's responses are in blue text in block quotes.

## G.1 Comments from Residents

### 1. Carrie Seltzer

*To Whom It May Concern,*

*It is clear that a great deal of attention and rigor has gone into this document and I want to commend the lead authors on their hard work. I am thoroughly impressed and have only minor suggestions/corrections.*

*Suggestions:*

*On page 65 (section 3.4.2), it is noted that "Incidental observations were included" in SGCN Richness and Abundance Data Layers. I am curious as to the types and sources of incidental observations, since citizen science could be an important source for such observations moving forwards.*

> Incidental observations are observations of species that are detected during the conducting of wildlife surveys not targeting that species or fauna. An example would be of an SGCN dragonfly species being documented during a bird survey.

Citizen science can play an important role in data collection and wildlife conservation. Efforts will be made to expand current citizen science programs and introduce others.

*In Section 4.6.1, the newly described salamander chytrid fungus should also be added to the list. It has not yet reached the United States, but is threatening salamanders in Europe.*

> DOEE has added salamander Chytrid fungus to the list of diseases. There are a host of emergent diseases that may pose a threat to wildlife in the District in the future. The spread of Batrachochytrium salamandrivorans across Europe will be monitored, and an appropriate response will be developed if the fungus is detected in North America. See Section 4.6.1.

*In section 4.7 (page 100), it says "Developed habitats offer little to no value to most wildlife species." It seems that this undervalues the potential of landscaping to benefit*

*invertebrates, especially bees. Bees aren't most wildlife, but it seems worth mentioning the exceptions to that statement.*

> Many wildlife species require resources that are not available in hardscaped, densely developed, urban areas. DOEE has robust RiverSmart Homes and RiverSmart Schools programs that create pollinator and other invertebrate habitats in more developed areas. Nearly one thousand homes have participated in the program and 43 schools have pollinator or backyard habitat gardens. There is also a RiverSmart Communities program that handles projects on a larger scale. There are four species of bee that have been added to the SGCN list in the 2015 WAP. The 2015 SWAP identifies the need for more research for native DC bees.

*There is tremendous potential for great engagement in citizen science biodiversity observations using iNaturalist for fairly minimal investment on the part of DOEE. Some staff time and some marketing attention would be required, but the technological infrastructure (including apps) to share photo- and sound-documented observations of biodiversity, crowdsource identifications, and download the data in spreadsheet form exist. In my role as Program Manager for National Geographic's Great Nature Project, I am very familiar with iNaturalist's strengths and limitations and would be more than happy to help DOEE staff set up a project. This could replace the existing online form for cottontail observations and would make it easier for people to submit their photos along with the additional details of where and when, which would be a very efficient way to rapidly "expand the Citizen Science Program to other SGCN species" (as mentioned in Section 6.5.7).*

> Citizen science can be a tremendous resource for providing data that would be otherwise unobtainable. Advances in technology have made citizen science even more accessible and valuable. DOEE welcomes a conversation to investigate potential projects.

*I look forward to seeing the final document and further discussing the possibilities for citizen science.*

**2. Vincent Verweij and Dana McCoskey**

*General Comments:*

*Can you provide some context with the other surrounding states' SWAPs? What Maryland and Virginia are doing, and how DC fits in that context. Some of this is addressed in Chapter 4, but it may be useful to get more specific.*

*Is there coordination between DOEE and animal control on wildlife data?*

*For most maps, the tips of the North, East, and South are cut off. It doesn't seem worth sacrificing completion for the little bit of resolution you get from this. I suggest making the maps full-page if needed for resolution.*

*There seems to be inconsistency in naming species. Some parts of the document call out the scientific name, where others do not. Pick one, or provide a glossary with full names pointing to consistent common names. The same thing applies to capitalizing common names. Where Emerald Ash Borer is capitalized in one place, red maple isn't in the same section.*

*It would be prudent to cooperate with planning/development agencies to advise them on impact of development on the systems to be protected. Most of the partners in this document are generally already on board with conservation actions, but some of the highest impact can sometimes be had from cooperating with the development community.*

*Was all private land with potential for wildlife benefit surveyed or estimated?*

*If you're interested in volunteer veg surveys, I'd be happy to help. Let me know if that's something you need, or if there's a system in place for this.*

*Page Comments:*

*p. 12: Note the niche coyotes are occupying. "Recent reports of coyotes, finding their niche as a predator"?*

Added.

*p. 15: Write a small sentence on the NatureServe process, as it seems to differ from the Millsap process.*

Added under 2.3.4.

*p. 17: Provide consistency with the other groups in the fish section with examples of the range of scores (just like Woodcock to Mallard).*

Added.

*p. 19: Would reintroduction be considered for Historical Species? Not advocating it, but it might need to be addressed.*

Possibly. If a project becomes feasible, DOEE can revise the SWAP anytime to include it.

*p. 32: Add an inset showing the detail for DC on the map.*

*p. 36: In soils, mention the significant level of human-created land. This is significant enough to address separately. I realize "altered udorthent soils" speaks to this, but that's not very reader-friendly.*

Added: Udorthent soils represent a significant level of land area adjacent to the Anacostia and Potomac Rivers that was created through dredge/fill reclamation operations. See Figure 27 for an example.

*p. 42: If you have this option, I would change the category of "Canopy trees and Recreational Grasses" to "Landscaped trees and recreational grasses". Larger canopy trees in these systems are usually primarily an aesthetic element, and rarely connected enough for anything but very minimal wildlife benefit.*

Leaving as is to remain consistent with NPS vegetation maps.

*p. 47: Baldcypress is one word, as it is not a cypress.*

This is in a direct quote. Leaving as is.

*p. 49: Blackgum is one word, as it is not a gum tree.*

This is in a direct quote. Leaving as is.

*p. 69: Unsure why values of 1 and 10 were used, instead of just present/non-present. I wouldn't confuse people with these values, as they might imply some qualitative value.*

Clarified in text.

*p. 92: Resource Management Needs and Education and outreach seems flat on the ratings. I would argue it's easier to advocate for forests than some other habitats, like swamps. I suggest being a little more variable with the numbers, as much as it is important to address all habitats.*

*94: Mention that some invasive species are currently still cultivated and sold. This needs to be addressed, as this adds to the pressure.*

Added.

*p. 99: Are Red-eared sliders worth mentioning in the invasive animal species?*

Added.

*p. 107: Severe storms are having a greater impact on our tree canopy, as well, which is aggravating public opinion of trees and their value to wildlife.*

### 3. David Cottingham

*District Department of the Environment*
*Fisheries and Wildlife Division*
*1200 First Street, NE, 5th Floor*
*Washington, DC 20002*

*Dear Mr. Ossi,*

*As a long-time resident of the District of Columbia and wildlife conservation professional, I applaud the efforts of the District Department of Environment (DOEE) Wildlife and Fisheries Division for taking the past few years to assess the District's wildlife heritage. Your comprehensive analysis enabled DOEE to assess wildlife habitat, identify*

*wildlife threats, and present a range of solutions using the best available scientific literature and field data. I appreciate an opportunity to comment on the Draft Plan.*

*The Draft Plan lays out opportunities for senior officials in the District government, including the Mayor's Office, Attorney General, and City Council, to take steps to ensure that DOEE has adequate funding and authorities to implement measures called for in the draft Plan. It also provides DOEE the opportunity to recommend changes to policies and laws to the Council needed to implement various components of the draft Plan.*

*The Draft Plan does a good job of describing DOEE Wildlife and Fisheries Division programs to benefit wildlife and wildlife habitats. Within the broad extent of District and Federal programs, many other agencies' actions affect wildlife through the way that they conduct their activities. For example, DOEE Stormwater Management encourages District residents to plant rain gardens using native vegetation which benefits wildlife. The Department of Transportation (DDOT) manages roads and lighting, both of which affect wildlife. Federal land management agencies, like the National Park Service, manage waterways and many parcels in the District which provide excellent wildlife and fish habitat. I recommend mention of such programs in the Draft Wildlife Action Plan and encourage the Mayor's Office to ensure all Departments' efforts are in line with the goals of this Draft Plan.*

*Specific Comments*

*Coyotes and wild turkeys: I recommend that Wildlife and Fisheries Division include coyotes and wild turkeys as SGCN and assign them at least a Tier 2 Priority. Both have naturally re-colonized Rock Creek Park. Several breeding adult pairs of coyotes now have dens. I enjoy seeing wild turkeys around the Rock Creek Park Golf Course and seeing and hearing coyotes throughout the Park. It's thrilling to know they are there, even if visitors don't frequently see them.*

> Coyotes (*Canis lantrans*) are not considered native wildlife in the DC region, therefore they were not considered as candidates for SGCN designation. Furthermore, they are entering the area without being introduced.
>
> Wild turkeys (*Meleagris gallopavo*) are common and have a stable population in the District. Wild turkey have been recorded in almost every park in the District, including; Rock Creek Park, Chesapeake and Ohio Historic Park, Fort Dupont, Kingman and Heritage Island, Popular Point, Shepard Parkway, Oxon Run, Bald Eagle Hill, and Kenilworth Aquatic Gardens.

*<u>Problematic Native Species:</u> The Draft Plan identifies whitetail deer and Canada geese as two native species that can adversely affect wildlife habitat in Section 4.5.4. As a close-by neighbor of Rock Creek Park, I couldn't agree more. Because of damage to plants in our yard, we installed a 7-foot high deer fence. Decimation of low-level vegetation has stopped. Small trees and shrubs are now coming back. I fully support the National Park Service's program to maintain a deer population that is in balance with conservation of native vegetation so that all species can thrive. I applaud DOEE's acknowledgement of NPS actions to control deer populations in the Park.*

*Invasive Species as Threats to wildlife: I commend DOEE for addressing the topic of the devastating impact that free-roaming cats have on wildlife, particularly protected birds and small mammals. I encourage you to strengthen actions taken to reduce these impacts.*

*In Section 4.6.2 Invasive Animal Species, the Draft Plan mentions threats caused by free-roaming cats, both domestic and feral, including statistics on bird and mammal losses they cause, citing papers from Loss et al. and American Bird Conservancy. These papers are the best available science on the impact of free-ranging cats on birds. Free-roaming cats in the city pose significant impacts, particularly on ground-nesting bird species like wood thrush and ovenbirds, both of which Table 2 lists as Tier 1 Priority species and protected by the Federal Migratory Bird Treaty Act. Similarly free-roaming cats prey on Tier 1 priority mammal species like eastern chipmunks, Northern short-tailed shrews, and meadow voles. The conservation actions to address this in Section 6.4.1 (Non-Habitat/Species Based Actions, Invasive Species) do not adequately take action to stem the problem. Recommending that "Government-sanctioned Trap-Neuter-Release (TNR) programs in the District should be revisited" (pp 144 -145) is a weak solution to the problem from the Wildlife and Fisheries Division identifies. Furthermore, the District has supported TNR programs for many years. What evidence is available that they are successfully reducing free-roaming cat populations?*

*I recommend that:*

*District officials immediately tell TNR programs to cease releasing neutered cats onto National Park Service property. Doing so without adequate analysis and public comment is likely a violation of Federal law. NPS Police do not have the resources to monitor for such activities.*

*The Wildlife and Fisheries Division should urge the City Council to immediately stop supporting TNR programs with public dollars and reconsider outdated policies established to promote TNR.*

*The Wildlife and Fisheries Division and animal control programs should 1) institute a trapping program for free-roaming cats whereby captured cats would be offered for adoption, and 2) if not adopted in a reasonable time, find alternative solutions for handling them other than releasing them where they can potentially do significant damage to priority species.*

*The "performance measures" for Section 6.4.1 do not support the related discussion. It is unclear how the "number of participants in backyard habitat bird programs" solves the identified problems associated with cats, snakeheads, blue catfish, and other invasive species. Better performance measures would be: 1) elimination of public funding for TNR programs, and 2) reduction in number of feral cat colonies near public lands and potential wildlife habitats.*

Inserted more appropriate performance measures.

*Vernal pools: Section 6.5.5 calls for creation and restoration of vernal pools because of the important habitat they create for wildlife, amphibians, and insects. I agree and*

*support this. This is a good opportunity for DOEE branches to work together. For instance, the Stormwater Management Division actively supports day lighting of buried streams and installation of stormwater regeneration ponds. Three examples of this in Rock Creek Park now provide outstanding habitat for a number of birds, amphibians, and insects. Getting authorization to do this work on federal property required many approvals. Nevertheless, benefits to wildlife because of improved habitat begin to appear within a year and last for decades. I urge the Division of Wildlife and Fisheries to explicitly state that it will coordinate with other parts of DOEE and federal agencies to identify opportunities to install stormwater regeneration and stream day lighting facilities to improve wildlife habitat.*

Updated sections 6.1.2 and 6.1.5 to reflect habitat creation within the context of stream restoration designs–both on federal and non-federal land.

*SUMMARY*

*I commend the Division of Wildlife and Fisheries for comprehensively assessing the District's wildlife resources, developing the 2015 Draft Wildlife Action Plan, and soliciting public input on the Plan. The Plan will guide actions by DOEE and City Council to conserve wildlife and habitats for years to come. Implementing this Plan requires support from the Mayor and City Council. I hope that the City Council and Mayor will support policies needed to improve wildlife habitat and programs described in the Draft Plan with adequate funding and policy modifications. I would welcome an opportunity to work with DOEE leadership and elected officials to build support for this important work.*

## G.2 Comments from Conservation Organizations and other Stakeholders

### 1. Biophilic DC; Stella Tarnay

*Sept. 6, 2015*
*Comments on the*
*2015 District of Columbia Draft Wildlife Action Plan (WAP)*
*Department of Energy and Environment (DOEE)*
*(Public Version, July, 2015)*

*1. The draft Wildlife Action Plan is a high-quality, professional document that promises to be a valuable resource for the District.*

*The draft WAP is a well-researched and well-written document that is accessible to resource managers and conservation professionals, and to citizens who want to read more deeply about the District's natural environment. The plan offers excellent science-based information about wildlife habitats and species in the District. This information will be helpful to organizations such as ours, as we seek to engage the public with the District's natural history and environment. Similarly it is helpful for us to know which animal species DOEE is prioritizing for conservation. We recommend that a shorter,*

*public-oriented version of the plan be developed once the required technical document is finalized. This public-oriented plan can translate WAP goals into less technical language, with accessible maps and images, for residents and nonprofit organizations that would like to know more about DC's wildlife and its habitats, but who do not have the knowledge or time to read a detailed professional report.*

*2. We support Conservation Actions identified in the draft WAP.*

*We are generally supportive of the identified WAP Conservation Actions. We are especially encouraged that wildlife and pollinator corridors, backyard habitats, bat houses, habitat reintroduction along rights of way, and transformation of mowed lawns and fields into meadows are proposed. We agree these are essential steps for preserving biodiversity in the District of Columbia.*

*3. Valuable habitats may extend beyond formally designated Conservation Opportunity Areas.*

*The draft WAP notes that the District is home to an abundance of plant and animal species, in part due to its unique geology and the large number of dedicated park areas. Indeed, studies show that cities can be unexpected reservoirs of biodiversity. For example, recent research conducted by the Natural History Museum of Los Angeles County and other research partners found tremendous diversity in Diptera species in the city (Grimaldi et al., 2015, attached; and http://www.latimes.com/science/sciencenow/ lasci-sn-new-flies-la-20150326-story.html). This research was conducted on residential properties, highlighting the potential importance of these spaces for biodiversity protection. We understand that WAP requirements call for the designation of distinct Conservation Opportunity Areas for SGCNs, and indeed, these areas provide important sanctuaries for wildlife. However, as the previous Los Angeles County example illustrates, developed urban areas, especially residential neighborhoods, can be home to a surprising range of wildlife. Early in the document, the draft WAP acknowledges that urban and suburban portions of the District could be "integral components of the habitats that SGCN require." However, later the draft states that urban and suburban residential areas and other developed habitats have little habitat value (although a few examples of how they can be – such as the presence of canopy-height native trees – are included). We believe that it is especially important for a wildlife action plan in an urban area to acknowledge that nature exists throughout the city, not just in designated greenspaces. We encourage DOEE's Fisheries and Wildlife Division to incorporate the "gray" developed zones and the District's suburban residential areas into the WAP. Especially when grouped together, these areas can provide habitat for a variety of significant species. (See Belaire, Whelan, and Minor, 2014, attached.)*

> Adjusted language and fixed maps with new colors. These areas will be targeted under citizen science programs similar to DOEE's cottontail rabbit program.

*4. Conservation Opportunity Areas should be paired with urban Engagement Opportunity Areas for a robust conservation plan.*

*As noted above, the "gray" developed zones of the District are home to a variety of flora and fauna, some quite abundant, and these are the species that human residents are likely to come in contact with. From a Biophilic point of view, it is important that these species be acknowledged, and a culture of engagement, mutuality, and understanding be developed. Such zones can be considered Engagement Opportunity Areas where residents can enjoy the experience of nature close to home, school, and work, and where their knowledge of the natural world can grow. Engagement Opportunity Areas in developed parts of the city can be gateways to greater understanding of urban wildlife in general, and potentially for SGCNs needing special protection.*

> This document targets declining and rare species, which are typically uncommon in developed areas. Large groups of SGCN (such as salamanders and turtles) have been extirpated from most high-density residential and commercial industrial areas. While patches of habitat do have value for some common species, DOEE must focus thi splan on the rare and declining species whose habitat can be restored.

*5. Outreach and citizen engagement should be identified as primary conservation strategies in the WAP.*

*The draft WAP identifies citizen engagement and outreach among a number of activities that will take place during WAP implementation. We believe they should be considered primary, rather than secondary strategies for ensuring long-term conservation of SGCNs and of urban biodiversity in general. Without an educated and engaged citizenship, it will be difficult to implement the various physical interventions identified in the plan.*

> The USFWS requires SWAPs to include conservation actions that can be monitored and shown to improve population trends for rare species. Outreach and education activities are limited to 10% of expenditures of projects funded by the State Wildlife Grant program. DOEE will continue to operate several ongoing programs that engage citizens: aquatic resources education, schoolyard greening, the Urban Bird Treaty Grant, and others.

*6. Neighborhoods and private property owner engagement will support WAP goals.*

*We encourage DOEE to build relationships with neighborhoods, from suburban residential areas near Rock Creek Park and Fort Dupont Park to mixed-use neighborhoods such as Adams Morgan and Deanwood, and highly developed commercial neighborhoods such as NoMa. First, some of these neighborhoods (where property is held largely in private hands) lie along and between significant habitats. Such neighborhoods will be key to protecting, connecting, and extending viable habitats. Second, some of these neighborhoods are already home to abundant wildlife, and relationships with private property owners and residents will support conservation goals. Third, increasing and enhancing habitat on privately held lands can in itself be a useful outreach and education tool, and accessible habitats in neighborhoods will provide opportunities to enjoy wildlife without increasing the stress to protected areas caused by residents visiting these spaces, which is noted as a serious*

*threat to wildlife in the draft WAP. It is worth stating that most neighborhoods now have active communications hubs. Important messages related to conservation can be sent via active email lists, neighborhood social media, and association newsletters. Residents on some of these lists are already discussing conservation-related topics such as backyard habitat gardens, pollinator-friendly plants, tree health, and bird activity.*

> The USFWS requires SWAPs to include conservation actions that can be monitored and shown to improve population trends for rare species. Outreach and education activities are limited to 10% of expenditures of projects funded by the State Wildlife Grant program. DOEE will seek to perform outreach in residential areas, but is limited by the funding source. When new citizen science programs are instituted, DOEE will promote them in targeted neighborhoods.

*7. Schools and community center planning should incorporate WAP conservation goals and Biophilic environments.*

*Public and charter schools provide unique opportunity areas for habitat creation and human engagement with nature. The Marie Reed Community Learning Center in the District, in the final stages of planning, is an example. This innovative facility will integrate a preK–5 elementary school with a community health clinic, a pool, and a daycare center. The design team is taking a Biophilic approach, and incorporating native landscapes and stormwater retention techniques, such as the ones used at Ducketts Lane Elementary School in Howard County (http://www.bradleysitedesign.com/Project/Educational-0024-Cultural/Ducketts-Lane-Elementary-School.aspx). Nature-ful schools will bring health benefits to children and educators, and will accommodate small-scale wildlife habitats. The completed Discovery Hill Outdoor Learning Center in Austin, TX is another inspiring example of a wildlife habitat that supports learning and community wellbeing (https://www.youtube.com/watch?v=g4WbnRylruc). Low Impact Development (LID) projects, green roofs, and landscapes and gardens in schools can meet multi-purpose goals inclusive of wildlife habitat. Further, such schools can grow an engaged citizenry and future wildlife biologists! Sidwell Friends School's recent renovations offer yet another good example of integrated, multi-functional landscape design (http://dirt.asla.org/2011/12/14/how-to-integrate-design). Early information from citizen science programs such as Smithsonian E-Mammal (http://emammal.si.edu/regions/north-america) suggests that starting in elementary school, children can make meaningful contributions to citizen science through schoolbased STEM and enrichment programs. Student citizen science programs could potentially start on school-based landscapes.*

> Schools will be targeted under citizen science programs similar to DOEE's cottontail rabbit program.

*8. Partnerships for public engagement, citizen science and monitoring will strengthen WAP implementation.*

*The WAP identifies monitoring, data collection, citizen education, and citizen science as promising activities for long-term conservation. We agree. At the same time, the draft WAP notes that venues and resources for outreach and education are currently limited.*

*We observe that DOEE has many potential partners, with demonstrated expertise, including National Geographic, the Smithsonian, the Audubon Society, the Anacostia Watershed Society, members of the Biophilic DC Working Group, and area universities, which can help realize a robust citizen science program. A well-developed citizen science program could supplement limited DOEE staff resources, support data collection and education goals, and build a constituency for WAP-based conservation. Biophilic DC is especially supportive of and interested in working with DOEE and nonprofit partners, where resources are available, on:*

- *Pollinator and wildlife corridor development*
- *Innovative habitat creation on private and public properties*
- *A collaborative citizen science training workshop to develop a cohort of participants and best practices, to include Biophilic DC, National Geographic, Smithsonian, City Wildlife, and others*
- *Citizen science pilot projects*
- *Data collection and monitoring*
- *Development of media for citizen engagement*
- *A rooftop habitat education program to work with commercial and residential building owners; and a similar program to support creation of vernal pools and aquatic habitats*
- *Increased access to nature in support of WAP education and conservation goals. We encourage DOEE to build collaborations that will educate citizens on climate-related issues pertinent to habitat restoration. Several nonprofit organizations, in particular National Geographic, are already developing resources that can support the climate element of the WAP.*

DOEE will explore other partners and projects for citizen science.

*9. We encourage cross-agency and DOEE cross-division collaborations for WAP goals.*

*We are pleased to see plans for cross-agency collaboration that will protect and restore the District's wildlife habitats. We encourage DOEE to make the most of internal crossdivision collaborations, to include the Watershed, Stormwater, Green Building, and Sustainable Business programs. Opportunities that may come out of such collaborations include:*

- *Green roofs that collect stormwater and support habitat*
- *Bird-friendly building codes*
- *Incentives to make existing buildings bird- and generally wildlife-safe*

  *LID projects that support pollinator gardens, conservation corridors, vernal pools creation, and rain gardens as habitat*
- *Smart Business Challenge partners who make wildlife-friendly operations part of their standard practice.*

*10. WAP goals can be creatively met with multi-level sustainability-based projects*

*The University of the District of Columbia (UDC) native plant nursery, cited in the draft WAP, is a good example of a creative sustainability-based initiative that supports social, ecological, and economic goals. Similarly, green summer jobs programs that incorporate wildlife species education, and the District of Columbia Public Schools (DCPS) 5th grade nature experience component that is now part of standard curriculum are all excellent examples of creative projects that meet both human wellbeing and biodiversity goals. We look forward to seeing this kind of engagement flowing out of the WAP, and look forward to potentially collaborating on new creative projects.*

*11. Humane treatment of all wildlife species should be part of the WAP.*

*We encourage DOEE to employ non-lethal and humane means for managing invasive and/or overpopulated native species. Increasing concern for wildlife among District residents should be an important goal, and treating wildlife in a humane manner is central to reaching this goal.*

> The impact whitetail deer and resident Canada geese have had on critical SGCN habitats is sufficient to warrant rapid reduction in their populations. Therefore, DOEE supports NPS's decision to employ humane, lethal measures for the management of these species. In the case of resident Canada geese, these are a non-native subspecies that was introduced from western populations. The wetland plant communities did not evolve to withstand the browse pressure typical of summer goose populations. DOEE supports the full elimination of summer resident Canada goose populations. Winter-resident migratory Canada geese are not covered by these statements.

*12. Private de facto management of wildlife should be acknowledged in the WAP.*

*The draft WAP states that the only mammal currently managed in the District is the whitetail deer. However, this does not take into account the de facto management that occurs through the hiring of Nuisance Animal Control companies by District residents. There has been little research done to determine the effect these companies have on species commonly found in urban areas, but we believe that this management should be acknowledged and considered under the WAP.*

*13. WAP implementation should be supported with sufficient resources.*

*Biophilic DC strongly supports allocation of more financial resources to DOEE's Fisheries and Wildlife Division for implementation of the final WAP.*

**2. City Wildlife; Paula Goldberg – Executive Director**

*1. City Wildlife appreciates the professionalism and great value of this report.*

*City Wildlife appreciates the exceptional work that has gone into this report and the results that show it. The report is thorough, highly informative, well-documented, and*

*well-written. It provides both the public and wildlife professionals with a wealth of information not readily available elsewhere on the subject of the District's wildlife. We believe the report will help boost understanding and appreciation for wildlife in the District and will serve as an authoritative source for those who wish to undertake both macro- and micro- efforts at wildlife conservation in the Nation's Capital.*

*2. The maps should be available to the public in a variety of formats and include major street names or other geographic references.*

*The maps are extremely informative and in fact essential to an understanding of the plan. However, they are not easily read either in an 8 ½ x 11 printed form or on a normal computer screen. The graphic keys are often too small to read and the geographic locations highlighted are not readily understandable without major street names or other orienting information (e.g. Figure 20). Since one of the valuable uses of this plan will be to support a wide variety of conservation efforts throughout the city, persons interested in these projects will want to display portions of these maps to show their neighborhood in relation to the whole – or isolated, as the case may be. Thus we hope these maps will be made publicly available, preferably online, in a way that permits enlargement and printing of segments of each map as well as the whole, in color and with identifying landmarks or street names. If this is possible, instructions for how to download these maps individually should be included in the report.*

> The maps in the 2015 SWAP will be made available on DOEE's website for public use.

*3. Several additional supportive activities could be mentioned in the list of Conservation Actions: Opportunities for habitat creation in the built environment.*

*There are a number of opportunities within the built environment (Developed Systems) that could engage the public and increase habitat or provide resources for urban wildlife. Examples include the following: • Wildlife gardens. Plant native plants that support invertebrates, especially in existing rights-of-way and other small, underutilized parcels of land. • Accessible water sources. In many of the city's formal water features, the water is inaccessible to wildlife, including most birds. Providing accessible water features throughout the city would help both resident and migrating species. (Two examples of wildlife-friendly water sources in the District are the Southwest Duck Pond at 6th and I Streets, SW, and the Regional Garden stream at the U.S. Botanic Garden, both of which have edges that slope to the water and are frequented by wildlife.) • Biodiverse green roofs. Biodiverse green roofs have been shown to provide habitat for birds and invertebrates both in the U.S. and abroad (particularly in England and Switzerland). The green roof at the California Academy of Sciences, for example, was designed to attract the threatened Bay Checkerspot and is now more biodiverse than the surrounding parkland. (http://www.calacademy.org/explore-science/academy-roof-research) Similarly, the roof of the Chicago City Hall was originally intended just to showcase native prairie plants, but it now attracts numerous species of neotropical migrants and some nesting birds, as well. The concept of "footprint replacement" -- i.e. replacement of habitat removed with an equal square footage of new roof habitat – is*

*a well-established development principle in England and could be implemented here. Green walls might offer similar opportunities.*

*If combined thoughtfully, opportunities such as these -- which are consistent with development -- might serve both to engage the public and to help preserve the integrity of -- or at least reduce gaps in -- natural wildlife corridors.*

The District has one of the most robust green roof programs in the nation, with more than 40 acres in 2014 and climbing. There are also bayscaping and urban wildlife habitat creation programs at DOEE for school, residences, and communities.

*Educational opportunities through the Wildlife Rehabilitation function.*

*Wildlife rehabilitation activities are not mentioned in the plan, but it should be noted that wildlife rehabilitation, while perhaps not altering overall populations dramatically, does save the lives of numerous Species of Greatest Conservation Need (SGCN) such as woodcocks, opossums, and box turtles -- and, more importantly, offers strong opportunities for education about the needs and value of our native wildlife. Most people who bring an injured animal to a wildlife rehabilitation center are highly motivated to learn about the animal they have brought in -- especially when the information is provided by people who handle and care for these animals on a daily basis. They leave with a much greater understanding of and appreciation for the habitat needs of that particular species, and they spread this information among their friends and families. Wildlife rehabilitators are also excellent providers of education for children. It is the hands-on nature of wildlife rehabilitation that gives rehabilitators such great credibility as educators.*

Noted.

*Additional Species Monitoring Programs.*

*Throughout the District of Columbia there are literally acres of glass windows – many that kill birds. Some buildings are worse than others, but large or small, by reflecting foliage or sky or by appearing transparent, they confuse birds, especially neotropical migrants. It has been estimated that up to 1 billion birds die from window strikes in the U.S. annually (http://www.bioone.org/doi/abs/10.1650/CONDOR-13-090).1 Since 2010, volunteers for the Lights Out DC program run by City Wildlife (noted in Section 6.4.5 of the plan) have monitored the area near Union Station during spring and fall migrations and documented more than 1,200 victims of glass collisions, many of them SGCN. Thus it might be appropriate to list Lights Out DC as another Ongoing Species Monitoring Program (Section 7.1.1, p. 164).*

*City Wildlife recommends a Box Turtle Citizen Science Survey, similar to the Cottontail Rabbit survey, to identify Box Turtles throughout the District and to raise public awareness about their needs. There are believed to be quite a few turtles that live wild -- but in people's yards -- especially on Capitol Hill. Because of the relative scarcity and seasonality of Box Turtle sightings, this survey might have to be more than a single year in duration. Collection of historic sightings could improve the database.*

*4. Stress the importance of adequate funding for the National Park Service (NPS), particularly for its natural resource manager positions.*

*The District is unusual among U.S. jurisdictions in that the National Park Service (NPS) has jurisdiction over 88% of the city's parkland. The plan identifies resource deficiencies as a threat and supports increased funding for all stakeholders in wildlife conservation in the District (Section 4.4). It is widely acknowledged that NPS is currently experiencing funding deficiencies. This is of particular concern in the District. City Wildlife supports increased funding for NPS and DOEE, with particular emphasis on NPS's resource manager positions, so that both agencies can devote the resources and time necessary to work together to protect wildlife and wildlife habitat in all of the District's Conservation Opportunity Areas.*

*5. Cultivate the better appreciation of wildlife that will be required to protect our wildlife habitats.*

*As our urban wildlife habitats are increasingly pressured by economic interests, creative ways to foster public support and to give economic value to wildlife habitat will be essential if we are to protect these dwindling areas. Mitigation fees, development rights transfers, and "footprint replacement" requirements, for example, are all efforts that have been tested in other communities. In some cases, designation of new protected areas may be appropriate. Public education about the inherent value of wildlife and wildlife habitat is critical.*

*6. City Wildlife supports the comments of the Humane Society of the United States*

*(HSUS) regarding lethal control of wildlife populations.*

*As a policy, City Wildlife favors non-lethal control of animal populations; thus we support the recommendations of HSUS which offer a variety of non-lethal control measures for adult geese and deer. For example, if a program for addling goose eggs is begun, City Wildlife will seek volunteers to help participate in this effort.*

*7. City Wildlife would be interested in considering (or continuing) a partnership with DOEE on certain Conservation Actions.*

*City Wildlife is a relatively new organization with a small staff and limited resources. However, we would like to consider partnering with DOEE on the following projects: • Eliminating opportunistic "social" trails (using Glover Archbold Park as a pilot)—signage and outreach*

- *Collecting wildlife/vehicle collision data from existing sources (similar to City*
- *Wildlife's proposal for DOEE NRA FY2011 RFA)*
- *Assisting with a Box Turtle Citizen Science Survey and awareness program*
- *In addition, City Wildlife would like to continue partnering with DOEE on the following*
- *ongoing programs:*
- *Promoting Bird-Safe Building Construction and Light Reduction*

- *Continuing the Lights Out DC bird/glass collision monitoring program*
- *Providing wildlife rehabilitation services in DC*
- *Providing wildlife education in DC schools*
- *Providing general education to the public to increase the appreciation of wildlife in DC*

**3. American Bird Conservancy – Anne Law,Deputy Director of Conservation Advocacy**

*September 3, 2015*

*District Department of Energy and Environment*
*Fisheries and Wildlife Division*
*1200 First Street NE*
*5th Floor*
*Washington, DC 20002*

*Attention: Wildlife Action Plan*

*American Bird Conservancy (ABC) is a 501(c)(3) national non-profit organization dedicated to the conservation of wild native birds and their habitats throughout the Americas. Founded in 1994, ABC is the only U.S.-based group dedicated solely to overcoming the greatest threats facing native birds in the Western Hemisphere. ABC is submitting comments below to support the Department's Wildlife Action Plan for the District.*

*4.6.3 Other Threats/6.4.5 Light Pollution*

*Light pollution should be minimized by incorporating the use of down-shielding lights whenever possible as well as putting lights in buildings and those that are found on the perimeter of buildings on motion sensors. Both of these measures would be beneficial to birds and other wildlife in addition to being energy efficient providing monetary savings.*

*Performance measures for light pollution should be more specific and should not be just based on the number of buildings participating in Lights Out programs and the number of buildings participating in light-reducing LID strategies because those are not the only sources of light pollution.*

> DOEE will work will DDOT to develop programs to incorporate light reducing design for street lights.

*4.6.3 Other Threats /6.4.6 Collisions with Glass and Buildings*

*Bird-friendly design is not restricted to fritted glass. There are a number of different options that are also bird-friendly that include but are not limited to opaque, etched, stained, frosted or translucent glass. The use of secondary facades, netting, screens, shutters, and exterior shades are also considered bird friendly design. In order for fritted glass to be effective, it has to have a visible, effective pattern which is usually designed in accordance with a rule that restricts horizontal spaces to less than 2 inches high and*

*vertical spaces to less than 4 inches wide which is commonly referred to as the '2X4 rule.' (The LEED pilot credit PC55: Bird Collision Deterrence is a good resource for what constitutes bird friendly design.) Long-term solutions include smart design and incorporating all these options and not just fritted glass.*

*Removing vegetation from window areas is not an effective short term solution. Even without plantings near windows, birds often fly from one landscape feature to another a considerable distance away and pass buildings along their route. Vegetation a significant distance away can reflect in windows. A much better, less expensive alternative is to make glass bird-friendly by incorporating external screens which works well, and to have landscaping that is friendly to birds and people.*

*The performance measures should be more specific. The reduction in number of building/window strikes should be directly connected to the buildings that City Wildlife monitors through their Lights Out DC program. The District should incorporate bird-friendly design principles into the building code and performance outcome should be the number of new buildings following bird-friendly design principles.*

DOEE will track the number of buildings using LEED PC #55 for bird collision deterrence. Through partnerships, efforts will be made to inform building owners and designers of the positive outcomes of bird friendly designs.

*Whitetail Deer*

*Because of the significant effects whitetail deer overabundance can have on bird populations, both threatened bird species and common species alike, American Bird Conservancy supports the Department's effort to manage and monitor deer populations in the District.*

*ABC supports humane control of excessive deer populations. This may include non-lethal methods such as reproduction control, deer-proof fencing, or trap/relocate programs. Control may also include humanely-administered lethal methods such as increased and controlled hunting (using non-lead ammunition). Deer populations should be controlled at levels where natural understory and vegetation is maintained in order to ensure the health of bird populations and of the entire ecosystem.*

**4. Rock Creek Conservancy – Matthew Fleischer, Executive Director**

*Specific Comments*

***Coyotes and wild turkeys**: We recommend that Wildlife and Fisheries Division include coyotes and wild turkeys as SGVN and assign them at least a Tier 2 Priority. Both have naturally re-colonized Rock Creek Park. Several breeding adult pairs of coyotes now have at least two dens. Visitors regularly enjoy seeing wild turkeys around the Rock Creek Park Golf Course and seeing and hearing coyotes throughout the Park.*

Coyotes (*Canis lantrans*) are not considered native wildlife in the DC region, therefore they were not considered as candidates for SGCN designation.

Wild turkeys (*Meleagris gallopavo*) are common and have a stable population in the District. Wild turkey have been recorded in almost every park in the District, including; Rock Creek Park, Chesapeake and Ohio Historic Park, Fort Dupont, Kingman and Heritage Island, Popular Point, Shepard Parkway, Oxon Run, Bald Eagle Hill, and Kenilworth Aquatic Gardens.

***Sturgeon**: We recommend that shortnose sturgeon and Atlantic sturgeon, both of which are listed as Threatened under the Federal Endangered Species Act, be listed as Tier Priority 1. Because their habitat in the District is in the Anacostia and Potomac Rivers, DOEE Wildlife and Fisheries Division should be working closely with the National Marine Fisheries Service to find ways to improve habitat conditions to increase spawning in the tidal portions of District waterways. Recent improvements in water quality in both the Potomac and Anacostia should provide improved spawning habitat for both these species.*

The shortnose sturgeon (*Acipenser brevirostrum*) and Atlantic sturgeon (*Acipenser oxyrinchus*) are listed as Tier 2 and Tier 3 respectively in the 2015 WAP. Both fish are very slow to mature to adulthood and are not easily recoverable, which is a Tier 1 attribute. There has not been a record of an Atlantic sturgeon in District waters for more than 50 years, earning the species a Tier 3 designation.

***Problematic Native Species**: The Draft Plan identifies whitetail deer and Canada geese as two species that can adversely affect wildlife habitat in Section 4.5.4. In Section 6.1.4 the Draft Plan describes the impact of deer over-population in Rock Creek Park. RCC has witnessed the decimation of vegetation, particularly sub-canopy trees and shrubs, from deer in the Park. In areas where the National Park Service has excluded deer, healthy diverse vegetation is returning. The Conservancy supports the performance measure in the Draft Plan to reduce the density of whitetail deer to population levels that support healthy forest ecosystems essential to birds and small mammals.*

***Invasive Species as Threats to wildlife**: In Section 4.6.2 Invasive Animal Species (p. 99), the Draft Plan mentions threats caused by free-roaming cats, both domestic and feral, including statistics on bird and mammal losses they cause, citing papers from Loss et al. and American Bird Conservancy. These papers are the best available science on the impact of free-ranging cats on birds. Free-roaming cats in the city have the potential to have significant impacts particularly on ground-nesting bird species like wood thrush and ovenbirds, both of which Table 2 lists as Tier 1 Priority species and protected by the Federal Migratory Bird Treaty Act. Similarly free-roaming cats prey on Tier 1 priority mammal species like eastern chipmunks, Northern short-tailed shrews, and meadow voles. The conservation actions to address this in Section 6.4.1 (Non-Habitat/Species Based Actions, Invasive Species) do not adequately take action to stem the problem. Recommending that "Government-sanctioned Trap-Neuter-Release (TNR) programs in the District should be revisited" (pp 144 -145) is a weak solution to the problem from the Wildlife and Fisheries Division identifies. RCC recommends that:*

1. *TNR programs should immediately cease releasing neutered cats onto National Park Service property. In our conversations with NPS staff, they were not aware of TNR*

*animals being released on NPS lands. Doing so without adequate analysis and public comment is likely a violation of Federal law.*

2. *The Wildlife and Fisheries Division should urge the City Council to immediately stop supporting TNR programs with public dollars and reconsider outdated policies established to promote TNR.*
3. *The Wildlife and Fisheries Division should urge the City Council to institute a trapping program for free-roaming cats whereby the captured cats would be offered for adoption, and if not adopted, find alternative solutions for handling them other than releasing them where they can potentially do significant damage to priority species.*

*The "performance measures" for Section 6.4.1 are out of synch with the related discussion. It is unclear how the "number of participants in backyard habitat bird programs" solves the identified problems associated with cats, snakeheads, blue catfish, and other invasive species. Better performance measures would be: 1) elimination of public funding for TNR programs, and 2) reduction in number of feral cat colonies near public lands and potential wildlife habitats.*

Added appropriate performance measures.

***Collisions with Glass and Buildings*** *(pp. 100 and 147): The Draft Plan correctly points out that bird collisions with buildings and glass can kill birds of many species. Similarly, ornithologists regularly cite bird mortality associated with tall communication towers. Injuring or killing a migratory bird, even if unintentionally, can be a violation of the U.S. Migratory Bird Treaty Act. The U.S. Fish and Wildlife Service is considering ways to authorize incidental (unintentional) takes of migratory birds by considering industry-based best management practices to avoid such takes. Advances in reflectivity of commercial glass used in office buildings show potential for reducing collisions. As developers build new buildings seeking LEED certification, they should be using state-of-the-art glass technology to reduce collisions. We urge the Wildlife and Fisheries Division to work with DC Office of Regulatory Affairs (DCRA), which issues permits for buildings, to require that new buildings use bird-friendly glass. Similarly, DCRA should require any developer/owner of tall communications towers to install appropriate warning lights on towers that are bird-friendly.*

There is a LEED Pilot Credit #55 created by the U.S. Green Building Council for bird collision deterrence. Through partnerships, efforts will be made to inform building owners and designers of the positive outcomes of bird friendly designs.

*Backyard wildlife habitat: The Draft Plan briefly discusses "backyard wildlife habitat" programs and has two performance measures to increase the number of participants in backyard habitat and backyard bird programs (see discussion in Section 6.4.1 on pp 145 and 146). However, the Draft Plan provides little information about what current baselines are for the number of participants in these programs or descriptions of what the Wildlife and Fisheries Division intends to do to increase and measure participation. Rock Creek Conservancy has a long history of working closely with other branches of DOEE to increase public participation in stormwater runoff management and other community outreach programs. The Conservancy has a nascent backyard wildlife habitat certification program. We use the requirements/characteristics espoused by the*

*National Wildlife Federation in assisting homeowners improve their landscaping to benefit birds, pollinators, and other wildlife. We would welcome an opportunity to meet with Division of Wildlife and Fisheries and other organizations to find ways to improve wildlife habitat on private lands in the District.*

DOEE's RiverSmart Homes, RiverSmart Schools, and RiverSmart Communities programs create backyard habitats in urban areas. It would benefit a host of native wildlife species to expand backyard habitat programs, with partners in the District.

*Vernal pools: Section 6.5.5 calls for creation and restoration of vernal pools because of the important habitat they create for wildlife, amphibians, and insects. We agree and support this. This is a good opportunity for DOEE branches to work together. For instance, the Stormwater Management Division actively supports day lighting of buried streams and installation of stormwater regeneration ponds. Three examples of this in Rock Creek Park now provide outstanding habitat for a number of birds, amphibians, and insects. Getting authorization to do this work on federal property required many approvals. Nevertheless, benefits to wildlife because of improved habitat begin to appear within a year and last for decades. The Conservancy urges the Division of Wildlife and Fisheries to explicitly state that it will coordinate with other parts of DOEE and federal agencies to identify opportunities to install stormwater regeneration and stream day lighting facilities to improve wildlife habitat.*

Noted, and added in various locations in the document

**4. Capitol Hill Restoration Society; Lisa Dale Jones, President**

*Comments on revised Wildlife Action Plan*

*Dear Mr. Ossi:*

*The Capitol Hill Restoration Society (CHRS) commends the DC Department of Energy & Environment (DOEE) for its revision of the 2005 Wildlife Action Plan (WAP). The new revision builds on the 2005 plan, based on additional research, identifies additional species including invertebrates, adds to species in greatest conservation need, and suggests new initiatives. We offer the following comments, submitted by September 7, 2015.*

*<u>Comprehensive Plan</u>. The Comprehensive Plan is scheduled for revision. We urge DOEE to advocate for including priorities to preserve habitats by restricting development in Tier 1, Tier 2, and Tier 3, enhancing wildlife corridors (including separating wildlife from traffic), and increasing tree canopy to 40 percent.*

Added statement in 8.4.

*<u>Wildlife corridors</u>. The plan correctly identifies the important goal of expanding wildlife corridors. A corollary goal is to preserve existing wildlife corridors intact. The RFK Stadium area includes a Tier 1 (the most significant) wildlife habitat and is recommended for wetlands restoration. Heritage Island and Kingman Island are Conservation Opportunity*

*Areas. The WAP also identifies roads as a potential threat to wildlife. WAP, pp. 77, 81-83, 87. Nevertheless, DC Department of Transportation has repeatedly proposed building a "park road" (a commuter road) along the Anacostia River from Benning Road to Barney Circle. This road would bifurcate the wildlife habitat along this section of the Anacostia River and harm wildlife. We urge that the WAP strongly and expressly recommend against new roads in wildlife corridors. See revision to 6.5.8*

*Coordination among DC government agencies to further WAP goals. Two important goals of the WAP are reaching 40 percent tree canopy and reduction in storm water run-off. At an ANC 6A meeting on August 18, 2015, Department of Recreation and Parks (DPR) announced a pilot project for a "Zen garden" at the triangle park at 15th and North Carolina Avenue, NE. This park has multiple trees, paid for and watered by nearby neighbors. DPR's detailed plan calls for grade changes in the park, building earth mounds between trees, and adding paving where none exists now. DPR's plans appear to conflict with goals of the WAP. The DPR representative indicated that DOEE had not yet been consulted about the Zen garden and that because the park was under DPR's jurisdiction, there was no need to consult with the DC Department of Transportation. We urge DOEE to encourage all DC government agencies to work together with DOEE to further the goals of the WAP.*

Added language about coordination and collaboration to 8.4

**5. Casey Trees; Kristin D. Taddei, Planning Advocate**

*Re: Comments on the Draft 2015 District of Columbia Wildlife Action Plan*

*Dear Damien Ossi:*

*Casey Trees strives to connect District residents with the many benefits trees provide. Trees and help manage stormwater, reduce the urban heat island effect and provide much needed habitat for wildlife in our city. However, in the past 60 years, tree canopy in the District has declined from 50 to 36 percent. Therefore, Casey Trees appreciates the opportunity to provide comment to the Department of Energy and Environment (DOEE) on the Draft 2015 District of Columbia Wildlife Action Plan (the Plan).*

*We are dedicated to helping the District reach its 40 percent tree canopy goal by 2032, which has the potential to improve habitat for birds, invertebrates, mammals, and other Species of Greatest Conservation Need (SGCN) across the District. This goal is achievable only if the District protects existing mature trees, chooses to plant hearty, tolerant species in restoration efforts and fosters urban spaces where trees can live long, healthy lives.*

*We support the Plan's draft recommendations. However, in order to ensure a verdant tree canopy in the District's future, we recommend that DOEE prioritizes the following conservation and management strategies in the Plan:*

*First, we applaud DOEE's recommendation to limit the removal of mature trees in closed canopy forests, as this will contribute to achieving the District's tree canopy goal. As such, tree canopy should be included as a Conservation Target in Table 27,*

*and percent tree canopy should be an indicator of success for this Conservation Target.*

Noted and added

*Second, while we agree that native trees provide habitat value; native trees are not always the best option for urban streets or areas that will be impacted by climate change. Naturalized, non-native trees may be heartier, more drought-tolerant, and more resistant to the harsh conditions in these areas, increasing the chance of survival to maturity. To reflect this, we recommend the following language changes:*

*Current Language:*

"The aging of the street tree and suburban tree canopy may result in the loss of mature tree canopy and reduce the value of these areas. Increasing the use of native street trees where practicable instead of non-natives such as Norway maple (Acer platanoides) or Japanese zelkova (Zelkova serrata) could improve the value *of urban habitats" (page 101).*

*Recommended Language:*

The aging of the street tree and suburban tree canopy may result in the loss of mature tree canopy and reduce the value of these areas. Planting a mix of native and naturalized non-native street trees could increase resilience to the harsh conditions of our urban streets and improve the long-term value of urban habitats.

DOEE FWD does not advocate planting non-native plants, even in harsh conditions of the right-of-way. The invasive potential of non-native trees and plants is not rigorously reviewed before plants are integrated into the horticultural trade. Natural resource agencies must use extreme caution in supporting the planting of trees that could be invasive.

*Current Language:*

"When planting, restoring, or maintaining riparian buffers, managers will attempt to plant only native tree and shrub species that can tolerate flood conditions, and inundation tolerance will be considered when selecting plant species (page 118)."

*Recommended Language:*

When planting, restoring, or maintaining riparian buffers, managers will plant native and/or naturalized, non-native tree and shrub species that can tolerate flood conditions, and inundation tolerance will be considered when selecting plant species.

DOEE FWD does not advocate planting non-native plants, especially in high value riparian habitat. The potential for invasiveness of non-native trees and plants is not rigorously reviewed before plants are integrated into the horticultural trade. Natural resource agencies must use extreme caution in supporting the planting of trees that could be invasive. In this case species should be selected

to resist inundation and other potential habitat changes that occur due to climate change.

*Finally, we were excited to see eight conservation opportunity areas (COAs) selected as targets for conservation efforts. The Plan separately describes the current status of District habitats, and many of these habitats are present in the eight COAs. We recommend that DOEE prioritize the following four COAs because there are few young trees in these areas, and because trees in these areas are also being impacted by fragmentation or climate change:*

***Potomac River and Floodplain (COA 1):*** *As stated on page 47 of the plan, the "Northeastern Wetland Forest; Northeastern Floodplain Forest; Central Appalachian River Floodplain" habitat is found in the Potomac River Floodplain. This habitat typically includes oak and red maple trees but there are currently few tree seedlings and few saplings less than 15 years old in the Potomac River Floodplain.*

***Theodore Roosevelt Island (COA 2):*** *As stated on pages 47 and 49 of the plan, the "Northeastern Wetland Forest; Northeastern Floodplain Forest; Central Appalachian River Floodplain" and "Northeastern Wetland Forest; Coastal Plain Swamp; Northern Atlantic Coastal Plain Tidal Swamp" habitats are found on Theodore Roosevelt Island. These habitats typically include oak and red maple trees; and ash, black gum, red maple, American elm, and black willow trees, respectively. However, currently, Theodore Roosevelt Island is being impacted by fragmentation, and has few tree seedlings and few saplings less than 15 years old.*

***Northern Rock Creek Park (COA 4):*** *Central Oak-Pine habitat, which is found in Northern Rock Creek Park, is listed as vulnerable in the Plan. As stated on pages 46 and 112 of the Plan, there are few seedlings and saplings less than 15 years old in Northern Rock Creek Park, and the number of northern red oaks, present in this location, are predicted to decline due to climate change.*

***Large Fort Circle Parks (COA 7):*** *According to page 46 of the Plan, the Large Fort Circle Parks have the highest quality forest habitat in the District. However, Central Oak-Pine habitat, which is found in these parks, has been listed as vulnerable.*

These habitats are most impacted by invasive plant species and are overbrowsed by whitetail deer. Effective management of these two threats should restore the natural tree recruitment and succession within these forest habitats.

**6. National Park Service – National Capital Region; Robert A. Vogel, Regional Director**

*Attention: Wildlife Action Plan*

*Dear Mr. Ossi:*

*The National Park Service (NPS), National Capital Region has reviewed the 2015 State Wildlife Action Plan (SWAP) update and submits the following general comments with specific comments in attachment 1. The NPS understands that District of Columbia*

*Department of Energy & Environment (DOEE), in cooperation with federal, regional, and local partners, completed the SWAP in July 2015 and held public hearings in August 2015 to obtain public and agency comments on the findings contained within the SWAP. The draft plan identifies current needs, priorities, and conservation actions for the Districts' species of greatest conservation need.*

***General Comments***

*With much of the wildlife habitat in the District on National Park land, the NPS is identified as lead or co-lead to develop, coordinate, and implement many of the recommended conservation actions. NPS performs ongoing wildlife conservation efforts but the SWAP does not oblige NPS to provide funds, personnel, services, or other NPS resources unless otherwise agreed upon. Conservation actions identifying NPS as lead or co-lead must have concurrence from the respective park unit's superintendent. Please revise the Conservation Action Tables (Tables 11-*

*25) to include projected time frames (short-term, long-term), funding status, and describe actions more broadly so as not to imply that specific sites will receive certain actions. This will ensure transparency and clear implementation expectations. The NPS understands successful implementation depends on the strength and coordination of partnerships between agencies and organizations. The NPS is very interested in working with DOEE on wildlife conservation efforts and looks forward to developing a strategy together.*

*The SWAP should be a dynamic document and easily updated with best available science. The NPS suggests that DOEE consider developing and describing an addendum process, so that new species can be added without waiting until the next SWAP update in 2025. This will ensure that the plan is a living document, and that species will be afforded protection at the earliest possible moment.*

*NPS parks serve different purposes as defined in their enabling legislation. In certain cases, design features of the historic landscape include certain planned conditions (e.g., mowed areas) or plant selection (e.g., non-native species) contribute to the landscape. There are opportunities to evaluate if sustainable changes are possible, but as a historic district, certain design features are not appropriate.*

*Finally, the NPS understands that DOEE, United States Geological Survey, United States Fish and Wildlife Service, United States Department of Agriculture, State partners and non- governmental organizations have collaborated throughout the entirety of this project, and is appreciative of how receptive the DOEE has been to the input that the NPS has provided. For continued coordination with NPS National Capital Region, please contact Carol A. Pollio, Chief, Natural Resources and Science at National Capital Region, 4598 MacArthur Blvd NW Washington, DC 20007. Ms. Pollio can be reached by phone at (202) 339-8308 or email carol_pollio@nps.gov.*

*The NPS appreciates the opportunity to provide these comments.*

*Attachment 1 – NPS Specific Comments 9/11/2015*

| No. | Page | Section | Comment/Proposed Revision |
|---|---|---|---|
| 1 | V | Preface | *Replace "Analostan Island (also known as Theodore Roosevelt Island)" with "Theodore Roosevelt Island (historically known as Analostan Island)"*<br><br>Noted; language adjusted; note that this section is a colloquial account of the plan. |
| 2 | V | Preface | *Please consider including the eight species of ground beetles known in DC only from Theodore Roosevelt Island. {Anisodactylus dulcicollis (LaFerté-Sénectère), Elaphropus anceps (LeConte), E. saturatus (Casey), Oodes americanus Dejean, Pterostichus permundus, Scarites vicinus, Tachys oblitus (Casey) and T. potomaca (Erwin)} See: Steury, B.W. & P.W. Messer. 2014. Twelve Ground Beetles New to Virginia or the District of Columbia and an Annotated Checklist of the Geadephaga (Coleoptera, Adephaga) from the George Washington Memorial Parkway. Banisteria 43:40-55.*<br><br>*Steury, B.W., P.W. Messer, & J.F. Cavey. 2014. Noteworthy beetle records from Virginia, Maryland, and the District of Columbia (Coleoptera: Carabidae and Chrysomelidae). Banisteria 44: 23-25.*<br><br>Noted; please note that this section is a colloquial account of the plan. We can adjust the SGCN list according to the data in these publications. |
| 3 | V | Preface | *(3rd paragraph, first sentence) Please consider adding "for their own sake and" just before "for the benefit and enjoyment of residents and visitors".*<br><br>Noted and revised. |
| 4 | V | Preface | *(5th paragraph, Last sentence) Please consider including rain gardens, rain barrels, etc. and other storm water mitigation opportunities for residents through the River Smart program.*<br><br>No revision: note that this section is a colloquial account of the plan. |
| 5 | V | Preface | *(2nd paragraph, first sentence) Please consider adding "alongside federal agencies and other partners" to the end of the sentence.* |

| No. | Page | Section | Comment/Proposed Revision |
|---|---|---|---|
| | | | Noted and revised. |
| 6 | 2 | 1.2 | *Please clarify the extent of jurisdiction that DOEE has, taking into consideration the extent of federal land in DC.*<br><br>Added clarifying language. |
| 7 | 7 | 1.5.2 | *Please clarify if there are any invertebrate taxa (such as true bugs or beetles) that were not included within this criteria.*<br><br>Added clarifying language. |
| 8 | 11 | 2.1 | *(First Sentence) Please consider adding that high wildlife diversity is also due to the large amount of protected federal land (NPS land, Arboretum, etc.)*<br><br>Added clarifying language. |
| 9 | 12 | 2.1.1 | *Beavers are well beyond the recovery stage. They are considered to be "common" or "well-established".*<br><br>This section points out that beaver are notable for their ongoing successful recovery in the District. |
| 10 | 13 | 2.1.3 | *(First sentence) Please consider stating that "some birds are adaptable to the human environment..."*<br><br>Noted; added. |
| 11 | 13 | 2.1.3 | *(Mammals): Please clarify why chipmunks are mentioned as a SGCN?*<br><br>Some mammals found in the District are habitat generalists and are widespread, but even habitat generalists can be rare. |
| 12 | 13 | 2.1.3 | *(Mammals) Please clarify the status of the northern long-eared bat (i.e., has the long-eared bat shown decline within the District?)*<br><br>Widespread decline throughout its range due to WNS. Species is listed due to range-wide decline and recent ESA listing. Status is unknown in DC. Research is ongoing (mist-netting). |
| 13 | 13 | 2.1.3 | *(Reptiles) Please consider adding Batrachochytrium salamandrivorans (chytridiomycosis) as a potential, emerging* |

| No. | Page | Section | Comment/Proposed Revision |
|---|---|---|---|
| | | | *threat. (also applies to page 99, section 4.6.1)* |
| 16 | 14 | 2.1.3 | *(Fish) Please consider including in the last sentence both the endangered Atlantic and shortnose Sturgeon.*<br><br>There are no contemporary records of either Atlantic or shortnose sturgeon spawning or residing in District waters. |
| 17 | 14 | 2.1.3 | *Please consider adding to the number of invertebrate species observed and recorded since 2005 – see the Steury references above to add to this list. Contact, brent_steury@nps.gov to obtain copies.*<br><br>Noted; language adjusted. |
| 14 | 14 | 2.2 | *(Second paragraph, first sentence) Please consider adding "native" in the sentence so it reads "It is critical to conserve all types of native wildlife species"*<br><br>Noted; language adjusted. |
| 18 | 15 | 2.2 | *(First paragraph) Please note that the NPS can only verify the extent of Kenk's amphipod and Hay's spring amphipod in the area of the Rock Creek Valley under its jurisdiction (also applies to page 59, section 3.3.4).*<br><br>Noted; language adjusted. |
| 19 | 15 | 2.2 | *Please reconsider the statement, "The District has no federally threatened or endangered amphibian or avian SGCN" – Federally threatened Charadrius melodus (*piping plover*) and Calidris canutus (*red knot*) have both been observed at the mouth of Hunting Creek during migration. It is very likely that these birds pass through DC.*<br><br>Added. |
| 20 | 20 | 2.5 | *Throughout the document, please ensure the correct spelling of the following: Blarina (pg 20 section 2.5; pg 24 table 2; pg 116 section 5.6.2)*<br><br>*Lontra (pg 20 section 2.5)*<br><br>*sylvaticus (pg 21 section 2.5, pg 25 table 2)*<br><br>*Ondatra (pg 24 table 2)* |

| No. | Page | Section | Comment/Proposed Revision |
|---|---|---|---|
| | | | *Plestiodon (pg 24 table 2)*<br><br>*sirtalis (pg 24 table 2)*<br><br>Noted, fixed. |
| | | | *Notophthalmus (pg 25 table 2)*<br><br>*anomalum (pg 28 table 3)* |
| *22* | *21* | *2.5* | *Also see the following publication for a list of aquatic snail species from the DC area: Steury, B.W. 2014. Aquatic snails (Gastropoda) from national park sites in northern Virginia and adjacent Maryland, with an updated checklist of regional species. Banisteria 44:13–18.* |
| *26* | *26* | *2.5* | *In addition to the DC snail records provided in Steury & Pearce (2014) from Theodore Roosevelt Island the following native species are in the National Park Service collections maintained at GWMP which were added after the publication of Steury & Pearce (2014). All are from Theodore Roosevelt Island.*<br><br>*Carychium exiguum (Say) – Two C. exiguum were found crawling on the outside of a moist fallen branch at the floodplain forest/marsh ecotone.*<br><br>*Vertigo ovata Say – Two V. ovata were found in small crevices of a water logged branch at the floodplain forest/marsh ecotone. This snail was not documented from the District of Columbia by Hubricht (1985) but is listed from the DC vicinity by Richards (1934).*<br><br>*Glyphyalinia indentata complex (Authors) – One shell was found under a log in floodplain forest. There are three species, G. carolinensis (Cockerell), G. indentata, and G. praecox (H.B. Baker), with identical shell sculpture known from the Washington, DC area.*<br><br>*Hawaiia minuscula (A. Binney) – Two H. minuscula were found in a rotting waterlogged branch at the floodplain forest/marsh ecotone. The animals observed on Theodore Roosevelt Island were the more typical white color as opposed to the yellowish animals reported from swamp habitats near Washington, DC by (Steury & Pearce 2014).*<br><br>*Philomycus carolinianus (Bosc) – One of these native slugs was observed in a crevice of a waterlogged branch at the* |

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| | | | *marsh/floodplain forest ecotone.*<br><br>SGCN list has been updated. |
| 27 | 26 | 2.5 | *Please verify that listing the "regal fritillary" is correct Regal fritillary is a G3 species found only in a few patches of tall grass prairie in the east central US.*<br><br>Removed as SGCN, all references removed. |
| 28 | 26–27 | 2.5 | *Please reconsider the inclusion of* Oxyloma effusum and Oxyloma subeffusa *in this document, as it may be premature. Steury & Pearce (2014) report these two species as cf. (confer) and indicate that "detailed genetic analysis of* Oxyloma *from the District of Columbia area is warranted." The National Park Service has funding for a genetic study of DC area* Oxyloma *in 2016. If all* Oxyloma *in the DC area are worthy of listing they may be included here as* Oxyloma *sps.*<br><br>Noted; removed as SGCN pending taxonomic clarification. |
| 29 | 28 | Table 3 | *Please clarify why the eastern hognose snake received a SGCN score (on page 17), but is then being delisted due to "no current records of occurrence" (on page 28).*<br><br>All regional or historical species were assessed using Millsap. Eastern hognose received a Millsap score below 40 which was the cutoff score for reptiles. |
| 30 | 28 | 2.6 | *Greenside darter was delisted. Although it is native in nearby waters, please confirm that this species is native within DC...*<br><br>Species is native to the Potomac River. |
| 31 | 28 | Table 3 | *Birds: Remove Acadian Flycatcher? This is a forest interior neo-tropical species that seems to be at risk*<br><br>The Acadian flycatcher (*Empidonax virescens*) is one of the more common forest interior species in the District and populations are currently stable. This is in large part to the federally protected forests of the National Park system in the District. |
| 32 | 28 | Table 3 | *(Dragonflies and Damselflies)- Please note that Richard Orr located a historical record for Tachopteryx (Grey Petaltail) for* |

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| | | | *Rock Creek Park*<br><br>Restored to SGCN list. |
| *34* | *36* | *3.3* | *Please correct the park reference to "Chesapeake and Ohio Canal National Historical Park".*<br><br>Corrected. |
| *35* | *43–45* | *3.3.2* | *For figures 4, 5, & 6, please consider limiting the map key to only those "Habitat Systems" in the view of the focused-area maps, to ease the reading and understanding of the maps.*<br><br>Adjusted. |
| *36* | *46* | *3.3.2* | *For the following habitats (NE Upland Forest – Central Oak-Pine on page 46, Northern Hardwood and Conifer on page 47, and NE Floodplain Forest on page 48) please consider adding the sentence, "Formal and informal trails also fragment interior forest habitat and allow disturbance by humans and pets that otherwise would be there."*<br><br>Added. |
| *39* | *50–52* | *3.3.2* | *Freshwater tidal marshes also occur on Theodore Roosevelt Island. These are dominated by narrow-leaf cattail (*Typha angustifolia*) and the Virginia state threatened (*Bolboschoenus fluviatilis*) River Bulrush.*<br><br>Added. |
| *40* | *53* | *3.3.4* | *(Figure 7.) Would it be possible to emphasize (or even perhaps over-emphasize) the "Small River- Rock Creek" and "Creek & Headwater Creek" layers on the map? This would help to show the extensive network of tributaries to the Potomac and Anacostia.*<br><br>Added.<br><br>*Also, does the layer "Creek & Headwater Creek" include features such as intermittent stream channels or stormwater conveyance ditches?*<br><br>No.<br><br>*Lastly, has any sub-meter modelling been conducted to determine potential locations of vernal pools?* |

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| 41 | 55 | 3.3.4 | (Creek and Headwater Creek) Please consider adding "Hazen Run, Luzon Branch, Fenwick Branch, Portal Branch" to the list of streams.<br><br>Added. |
| 43 | 60 | 3.3.5 | (Developed Systems, first paragraph, third sentence) Please consider (re)stating the following, "These areas typically hold little value for wildlife," although golf courses can hold some value, especially birds. Also, add water features like fountains to developed systems.<br><br>Noted and added; "unless specific effort is made to include and maintain pockets of high quality habitat." |
| 44 | 61 | 3.3.5 | (Developed systems, first paragraph) – Please consider adding water features (like fountains) to develop systems.<br><br>Added. |
| 45 | 81 | 3.6 | (#4- Northern Rock Creek Park) Please correct as Hay's spring amphipod is not found in the northern part of Rock Creek Park.<br><br>Corrected. |
| 46 | 81 | 3.6 | Please add a period after "hickory shad".<br><br>Added. |
| 47 | 94 | 4.5.1 | (Second paragraph) Please correct to read that the northern snakehead is also found in Rock Creek (below Pierce Mill Dam).<br><br>Added. |
| 48 | 94 | 4.5.2 | Please consider creating a map of point sources and CSOs, as it would be good to visualize where they enter into aquatic habitats.<br><br>Added. |
| 50 | 95 | 4.5.3 | Please consider adding that "sedimentation is also problem along Rock Creek".<br><br>Added. |

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| 51 | 98 | 4.6.1 | *Please consider adding that "white-footed mice are an important component of the Borrelia life cycle" (also applies to page 124, section 6.1.4).*<br><br>Added. |
| 53 | 99 | 4.6.2 | *Please consider listing the Emerald Ash Borer as an invasive animal species.*<br><br>Added. |
| 54 | 113 | 5.6.2 | *It would be important to note climate change predictions on invasive plant behavior for D.C. and globally.*<br><br>There is not time to add that analysis before the plan is due. This may be something DOEE could include in its Climate Adaptation Plan. |
| 57 | 120 | 6.1.1 | *(Invasive Plants) Please correct the group listing to read "the National Park Service (NPS)" by deleting "exotic Plant Management Team (EPMT). NPS partners, as well as the 4 NPS parks in DC, also actively manage invasive plants, alongside the EPMT.*<br><br>Corrected. |
| 58 | 120 | 6.1.1 | *(Invasive Species, first paragraph, first sentence) Please consider adding that invasive species can also cause harm to human health.*<br><br>Added. |
| 60 | 121 | 6.1.1 | *Include Latin names to all species common names.* |
| 61 | 121 | 6.1.1 | *Please revise to reflect that EAB has spread throughout DC in all critical habitat, not just Anacostia River, etc.*<br><br>Revised. |
| 62 | 121 | 6.1.1 | *Please add a parenthesis after the words "*Anoplophora glabripennis*".*<br><br>Added. |
| 63 | 123 | 6.1.3 | *Please consider revisiting that the Nutrification/Sedimentation section makes no mention of the overuse of Orthophosphate in the municipal water system (to buffer against the effects* |

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| | | | *chloramine on the outdated conveyance system) and the role it plays in the eutrophication of DC natural waters (read leaky pipes, municipal water discharges), nor what steps are being taken to reduce this significant source of Phosphorus.* |
| 64 | 124 | 6.1.4 | *(Second paragraph) Please revise to read "...lack of population controls including predation...."*<br><br>Added. |
| 65 | 124 | 6.1.4 | *Please consider adding non-lethal control measures as well.*<br><br>Amended. |
| 67 | 124 | 6.1.4 | *Problematic Native Species - Based on its deer population counts at Fort Washington and Greenbelt parks, and on comparative analysis with other national parks in our region, NPS National Capital Parks East concurs that white tailed deer are overly abundance and have a direct impact on SGCN species and habitats. The native understory is destroyed and seedling regeneration is reduced. NACE has not yet, but may in the future, focus on management of these species throughout the Civil War Defenses of Washington corridor and Anacostia Park, including Kenilworth Aquatic Gardens, as recommended in DOEE's draft plan.*<br><br>Amended to include this information. |
| 68 | 125 | 6.1.4 | *Please consider re-wording "the goal should be to reduce... lethal control measures" to read, "DOEE's goal should be to reduce the resident Canada geese population to zero through a variety of control measures." Also, please consider adding that "even if the resident, non-migratory goose population is brought to zero, DC will still continue to be visited by migratory geese in the late fall and winter."*<br><br>Noted; added. |
| 70 | 125 | 6.1.5 | *(Recreational Activities and Infrastructure) Please consider adding a note about encouraging trail users to keep dogs on leash and clarifying that mowing of grassy areas along trails is timed to minimize damage to nesting birds and other SGCN and specify the desired period of time.*<br><br>Noted; added. |

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| 71 | 125 | 6.1.5 | *Please remove information regarding the trails through Rock Creek Park. The NPS has not completed data gathering and does not wish to publish numbers at this time.*<br><br>Noted; removed. |
| 72 | 125 | 6.1.5 | *(Rec Activities and Infrastructure,2nd paragraph, 3rd sentence) Please revise to read "... eliminate unauthorized social trails (which are informal trails created by repeated, erosive human foot traffic)..."*<br><br>Noted; added. |
| 73 | 125 | 6.1.5 | *Second paragraph – say eliminate "unauthorized" social trails and eliminate "informal trails created by erosion due to human foot traffic." Erosion results from foot traffic, but doesn't cause informal trails.*<br><br>Noted; amended. |
| 74 | 126 | 6.1.6 | *(Ecosystem Modifications) Please consider including stream restoration mitigation strategies (i.e. Regenerative Storm water Conveyance Systems) as one of the bullet items, asthis offers significant opportunities for habitat improvement. (also applies to page 135, table 17 & page 148, section 6.5, Focal Conservation Actions, second paragraph)*<br><br>Noted; amended. |

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| 77 | 127 & 131 | Tables 11<br><br>15 | Please correct the table to read that the NPS is the lead for deer management activities as it relates to Rock Creek Park's area of jurisdiction. At this time, the NPS has no plans to conduct population monitoring in Kenilworth Park or other Fort Circle Parks. Additionally, the NPS is not positioned to begin direct deer management, outside of Rock Creek Park, without first considering the impacts, and therefore cannot serve as a lead or partner agency for said areas. Please consider expressing actions more broadly so as not to imply that each drainage basin will receive the same actions on the same time table (and incorporate a time table in to the tables).<br><br>Please correct the table to read that the NPS is the lead for deer management activities as it relates to Rock Creek Park's area of jurisdiction. At this time, the NPS has no plans to conduct population monitoring in Kenilworth Park or other Fort Circle Parks. Additionally, the NPS is not positioned to begin direct deer management, outside of Rock Creek Park, without first considering the impacts, and therefore cannot serve as a lead or partner agency for said areas. Please consider expressing actions more broadly so as not to imply that each drainage basin will receive the same actions on the same time table (and incorporate a time table in to the tables). |
| 79 | 128–131 | Tables | (All tables – Invasive Non-Native Species)<br><br>Please clarify the reasoning behind selecting these specific plant species.<br><br>These are examples of invasive plants that are commonly found in these habitats. These lists are not comprehensive. |
| 80 | 128–145 | 6.3 | Tables 11–25. The National Park Service has been identified as the Lead Agency responsible for a number of conservation actions, and in some cases, as the only agency responsible. These will need to be assessed on a case-by-case basis by the relevant park superintendent. Additionally, please consider incorporating "funding status" and "projected timeline" as columns in all tables, as the NPS cannot agree to be the lead or partner agency for a number of actions without consideration of time, costs, and legal compliance. Lastly, there are a number of actions for which the NPS can be considered a funded and willing lead or partner. Please work with NPS parks and staff to identify these actions. |

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| | | | See new language in 6.3. |
| 81 | 128,<br>130,132 | Tables<br>12, 13, 15 | (Tourism and Recreational Areas/Recreation)Please consider adding DC (DDOT is building and semi-managing a number of trails), MWCOG, and NCPC as partners.<br>Added. |
| 82 | 128,<br>129,<br>130,<br>132,<br>134,<br>144,<br>145 | Tables<br>11, 12,<br>13, 15,<br>16, 24, 25 | Please consider including DOEE and DC Metropolitan Police as at least a partner in enforcing<br>Leash laws.<br>Added. |
| 84 | 129 | Table 12 | Please rewrite “sub-lethal” to read “non-lethal”. (also applies to page 131, table 14)<br>Corrected. |
| 85 | 130 | Table 13 | (Table 13 – Biological controls for mile-a-minute) Please remove the NPS as a partner agency, as this action has not been considered at this time.<br>Corrected. |
| 88 | 131 | 6.3 | Please define, or reword, the term "opportunistic litter." It isn't defined in the body of the plan.<br>Reworded. |
| 89 | 132 | 6.3 | Please rewrite “plat” to read “plants.”<br>Corrected. |
| 91 | 133 | Table 16 | (Problematic Native Species - SAV restoration)Please note that NACE recently revised its draft ROD for the Anacostia Park Wetlands and Resident Canada Goose Management Plan/EIS to reflect that the park may take this approach, but expects not to need to do so if the resident Canada goose population is significantly reduced, taking the stress off of existing SAV and |

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| | | | *allowing for natural rejuvenation without the need for direct plantings.*<br><br>Noted. DOEE and AWS are continuing to pursue SAV restoration in District waters. |
| 95 | 146 | 6.4.1 | *Please revise to read "TNR animals are often illegally released on National Park Service property and into prime wildlife habitats." It is illegal to release any trapped animal onto NPS property. This needs to be made clear in this section.*<br><br>Please note major revisions of this section. |
| 99 | 148 | 6.5.1 | *Please note, in Table 26, that the NPS will need to review proposals for meadow areas under its jurisdiction and specifically verify the DDOT Rights of Way for K Street & Rock Creek and Potomac Parkway, Virginia Avenue & Rock Creek and Potomac Parkway, as well as for Broad Branch Road & Linnean Avenue. Additionally, please provide additional information regarding how these sites were selected and how they are to be installed.*<br><br>Meadow areas in NPS are listed as potential locations for new meadows. DOEE owns no land in the District and will work in partnership with all landowners before proposing any specific restoration projects. DDOT ownership was determined using the DCGIS Owner_poly data layer and publicly available NPS boundary data layer. They are estimates only. Sites were selected visually using aerial photographs in a GIS. Mowed grassy areas along roadways were the primary targets during the selection process. Unmowed grassy areas were the secondary targets. Installation methods are yet to be determined. Several methods will be tested in a pilot project at a highway-style cloverleaf at North Capital and Irving Streets NE. |
| 100 | 151 | Figure 23 | *Please note that Memorial Circle, as well as Theodore Roosevelt Island, are both documented Cultural Landscapes within the boundaries of the George Washington Memorial Parkway Historic District. In certain cases, design features of the historic landscape include certain planned conditions (mowed areas) or plant selection (non-native) that are contributing to the landscape. There are opportunities to look at changes to be more sustainable, but in certain cases this would not be* |

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| | | | *appropriate.*<br><br>Noted. DOEE will work closely with NPS before proposing specific meadow restoration projects on NPS land. |
| 102 | 156 | 6.5.3 | *(Native Plant Propagation) Please clarify the capabilities of the UDC native plant nursery, as it relates to its sufficiency to meet current and expected needs.*<br><br>The nursery is as yet unbuilt. When completed it will consist of a 30x60 foot greenhouse with automatic heating and ventilation, refrigerated seed storage, soil warming tables for seed germination, and approximately 7200 square feet of shaded grow-out space.<br><br>Also, please note that the George Washington Memorial Parkway has a greenhouse at Daingerfield Island and works closely with Earth Sangha (http://www.earthsangha.org) on native plants for our restoration projects within the park. Perhaps there is an opportunity to work collaboratively on both sides of the Potomac.<br><br>DOEE and DC-CWMA will pursue such collaboration. |
| 103 | 156 | 6.5.4 | *(Second paragraph – First sentence) Please include impervious surfaces, groundwater depletion, as top threats.*<br><br>Added. |
| 104 | 158 | 6.5.6 | *(Trustee for Natural Resources) Please consider other Federal facilities in the District – National Zoo, Naval Observatory, Navy Yard, Ft. McNair, Bolling, Soldier's Home as potential trustees.*<br><br>Added. |
| 105 | 158 | 6.5.6 | *Please consider including Oxon Run (non-federal) as non-federally owned parcel for prime wildlife habitat*<br><br>Added. |
| 106 | 158 | 6.5.7 | *Please note that the George Washington Memorial Parkway has a small Citizen Science Program that focuses volunteer efforts on our "Bug Lab" work. Perhaps there is another opportunity to share best practices and work collaboratively on both sides of the Potomac.* |

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| | | | Added a reference. |
| 107 | 164 | 7.1.1 | *Please include fish monitoring (DOEE) as a bullet item as well as macroinvertebrate monitoring (DOEE). Include bee surveys {NPS and citizen science)*<br>Added. |
| 108 | 165 | 7.3 | *(Important Data Gaps, Invertebrate survey needs) Please consider including arachnids, beetles, moths, etc.*<br>Added. |
| 109 | 165 | 7.3 | *Under "Partner coordination," under snails, please include "NPS, George Washington Memorial Parkway," (see Steury & Pearce 2014 & Steury 2014), along with Howard University. Also, create a new line for "beetles" and include "NPS, George Washington Memorial Parkway," see (Steury, & Messer 2014 and Steury et al. 2014).*<br>Added. |

DOEE also received comments from organizations such as Friends of Kenilworth Aquatic Gardens, U.S. Fish and Wildlife Service–Chesapeake Bay Field Office, Anacostia Watershed Society, Committee of 100 on the Federal City, Capitol Hill Restoration Society, The Nature Conservancy MD/DC Chapter, and Howard Youth, author of A Field Guide to the Natural History of Washington, D.C.

## G.3 Comments Referring to Free-roaming Cats

### Comments and Letters

The draft of the Wildlife Action Plan that was published for public review on July 29, 2015 contained three paragraphs that referred to the threat to wildlife from free-roaming cats in habitats in the District. Section 4.6.2 Invasive Animal Species, which read as follows:

> *Invasive animal species not only impact habitats, they are responsible for the direct take of species through depredation and competition for resources. Free roaming cats kill an estimated1.3–4.0 billion birds and 6.3–22.3 billion small mammals in the United States annually (Loss, Will, and Marra 2013, North American Bird Conservation Initiative 2014, American Bird Conservancy 2015a).*

Section 6.4.1 Invasive Species read:

> *Cats (Felis catus) are non-native predators that have been among the worst invasive species globally (Lowe, Browne, and Boudjelas 2000). In the District, they take the form of free-ranging animals that damage bird, mammal, and reptile populations. Government-sanctioned Trap-Neuter-Return (TNR) programs in the District should be revisited. TNR animals are often released on National Park Service property and into prime wildlife habitats. Captured free-ranging cats can be taken in by several adoption facilities operating in the District. Education and outreach programs supporting 'cats indoors' programs should be promoted.*

In response to this language DOEE received more than 11,000 form emails and 998 form letters (667 initiated by Alley Cat Allies, 36 initiated by the Washington Humane Society, and 295 from other sources). While voluminous, the substance of the form letters and emails was nearly identical. DOEE also received comments from the Washington Animal Rescue League, the Virginia Federation of Humane Societies, the American Society for the Prevention of Cruelty to Animals, the Best Friends Animal Society, the Humane Society of the United States, Alley Cat Allies, the Alliance for Stray Animals & People, and Prince George's Feral Friends. These comments expressed opposition to the language referring to free-roaming cats in the draft plan. DOEE received 16 individual letters and more than 350 form letters from American Bird Conservancy. DOEE also received comments from People for the Ethical Treatment of Animals, Audubon Society of the District of Columbia, Maryland Ornithological Society, and American Bird Conservancy. These comments expressed support of the language referring to free-roaming cats in the draft plan.

**Public Hearing**

On September 4, 2015, the Committee on Transportation & the Environment of the Council of the District of Columbia published notice of intent to hold a Public Roundtable on the "Draft 2015 District of Columbia Wildlife Plan", and DOEE published a notice to extend the public comment period of SWAP 2015 to include testimony from the hearing:

*DEPARTMENT OF ENERGY AND ENVIRONMENT*

*NOTICE OF EXTENDED PUBLIC COMMENT*

*2015 District of Columbia Wildlife Action Plan*

*On August 7, 2015 the Department of Energy and Environment (the Department) published notice of its intent to solicit comments from the public on the District of Columbia Wildlife Action Plan. The Department of the Interior and Related Agencies Appropriations Act of 2002 (Title I, Public Law 107-63) directs all states and the District of Columbia to update their Wildlife Action Plan every ten years and to make this plan available for public review and comment. In accordance with this requirement, the Department developed and published a draft District of Columbia Wildlife Acton Plan for a 30-day public comment between August 7, 2015 and September 7, 2015.*

*On September 4, 2015, the Committee on Transportation & the Environment of the Council of the District of Columbia (the Committee) published notice of intent to hold a Public Roundtable on the "Draft 2015 District of Columbia Wildlife Plan". The Department is committed to considering any unique comments not already presented during the Department's public comment process while finalizing this Plan and will incorporate the testimony and record generated by the Public Roundtable to the extent that it provides new substantive information.*

*Please contact the Committee to ascertain their rules for submitting testimony and comments. Contact information is as follows: Aukima Benjamin, staff assistant to the Committee on Transportation and the Environment, John A. Wilson Building, 1350 Pennsylvania Avenue NW, Suite 108, Washington, DC 20004 or abenjamin@dccouncil.us. The Committee's record will close at the end of the business day on September 21, 2015.*

The published witness list:

**WITNESS LIST**

**NOTICE OF PUBLIC ROUNDTABLE ON**

**The Draft 2015 District of Columbia Wildlife Plan**

Friday, September 18, 2015
at 10:00 a.m.
in Room 412 of the
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

**PUBLIC WITNESSES**

1. Rebekah DeHaven, Alley Cat Allies
2. Peter Wolf, Bestfriends Animal Society
3. Scott Giacoppo, Washington Humane Society
4. Cary LaCheen, TNR
5. Anne Thiel, Public Witness
6. Paula Goldberg, Executive Director, City Wildlife
7. Emily Roderer, Public Witness
8. Marty King, Public Witness
9. Brittany Peet, PETA (People for the Ethical Treatment of Animals)
10. Jocelyn Ziemian, Public Witness
11. Grant Sizemore, American Bird Conservancy
12. Anne Law, American Bird Conservancy
13. Marc Selinger, Public Witness
14. Kurt Schwarz, NGO
15. Maryanne Dolan, Public Witness
16. Nancy Perry, American Society for the Prevention of Cruelty to Animals
17. David Bryant, Metro Ferals
18. Dana Hubbard, Four Paws Rescue Inc.
19. Susan Wallace, Four Paws Rescue
20. Sarah Blackwood, Public Witness
21. Hannah Shaw, Public Witness
22. Eric Robinson, Public Witness
23. David Cottingham, Rock Creek Conservancy
24. Carol Murphy, The Wildlife Society
25. Deborah Press, Public Witness
26. Adam Jablonski, Alley Cat Rescue
27. Zach Slavin, Audubon Society of DC
28. Dan Smith, Anacostia Watershed Society
29. Audrey Perdue, Public Witness

30. Jacqueline West, Public Witness
31. Dorothy Brizill, Executive Director, DC Watch
32. Paula Van Lare, Public Witness
33. Richard Patch, Public Witness
34. Stella Tarnay, Biophilic DC
35. Danielle Bays, Public Witness

**GOVERNMENT WITNESSES**

1. Tommy Wells, Director, DOEE
2. Damien Ossi, Fish and Wildlife Biolgist, DOEE
3. Bryan King, Associate Director for Fisheries and Wildlife, DOEE

Submitted written testimony:

**WRITTEN TESTIMONY**

1. S. Christina Raia
2. Seth Maloney
3. Sofia Crutchfield
4. Sue Houghton
5. Tom Conner
6. Tonya Allen
7. Veronica Zea
8. Nathan J. Winograd, No Kill Advocacy Center
9. Pete Farina
10. Rev. Linda B. Troy
11. Roberta Waterworth
12. Maria Smet
13. Maria Venuto
14. Marianne McDermott
15. Maryanne Dolan
16. Matthew Scoppic
17. Max Gibbons
18. Michele L. Frazier
19. Christina Reitz
20. Colleen Rodak
21. Karissa Silver
22. Karen Fishler
23. Kelleen Farrell
24. Kristine Oakhurst
25. Danielle Bays
26. David Cottingham
27. Deborah Press
28. Donna Parker
29. Elizabeth Silva

30. Emi Lynn Yamauchi
31. Gary Norman
32. Hannah Shaw
33. Emily M. Brown
34. Jennifer Murrow, University of Maryland (author of Chapter 5 Climate Change Vulnerability Assessments)
35. John McCoy
36. Anne Barton
37. Betsey Hathaway
38. Boudicca Todi

**Opposition**

The following is a summary of points raised in comments and testimony received in opposition to DOEE's position on free-roaming cats in SWAP 2015. DOEE responses are in block quotes.

*TNR program is effective.*

> This statement is unproven (Longcore et.al. 2009). The Washington Humane Society (WHS) estimated that there are 20,000 feral cats in the District (estimated during testimony) and Alley Cat Allies estimated 40,000 feral cats (estimated in a written follow up to testimony). Those population estimates, and WHS's testimony on its own neutering rate over ten years of TNR in the District result in an estimated 5%–8% neutering rate. In a closed population and given cats' high reproductive rates, TNR programs would need to achieve a 90% neutering rate to result in a stable population of feral cats. Higher rates are necessary to create a negative growth rate (i.e., to reduce the population) (Schimdt et. al. 2009). Populations in the District are open populations, with new individuals entering the population.
>
> TNR programs are not effective at alleviating the threats of feral and free-roaming cat colonies on feline health, human health, or native wildlife populations. Sterilization programs are ineffective in managing free-roaming cat populations (Jewgenow, et. al. 2006), and do not address the ecological impacts these cat populations can have on our natural resources (Guttilla 2010, Fayrer-Hosken 2006).

*TNR'ed feral cats are fed, healthy, stable.*

> Peer-reviewed research shows otherwise. Free-roaming cats lead a stressful life. Diseases, depredation, and accidental or intentional injuries significantly decrease the quality of life for free-roaming cats, even if nonprofits or volunteers have the resources to intensively manage a colony. Zoonotic diseases commonly found in cat colonies include rabies, feline leukemia, feline immunodeficiency virus, roundworm, ringworm, fleas, ticks, ear mites, abscesses, respiratory infections, urinary tract infections, and eye infections(Kalz et. al. 2000).

Some diseases are incurable, while others may require multiple treatments. Free-ranging cats are also vulnerable to vehicle impacts, injury, and depredation by native wildlife (Winter 2006).

*Feral cats have demonstrated minimal evidence of predation of wild birds.*

Peer-reviewed research shows otherwise. Free-ranging cat diets have been shown to consist of 69% mammal, 24% bird, and 5% reptile/amphibian species (Woods 2003). Free-ranging cats are likely the single greatest source of anthropogenic (human caused) mortality for U.S. birds and mammals (Dauphine 2011, Loss et. al. 2015). Studies have also shown that food provisions from colonies attract immigrating cats and other wildlife species (Gerhold 2011), and native wildlife closest to feeding stations are at the greatest risk of depredation by free-ranging cats (Smith et. al. 2002).

*Removing community cats from an area creates a "vacuum effect", where cats from neighboring areas move into the empty space to take advantage of food and shelter*

Peer-reviewed research has not shown this effect (Longcore et.al. 2009 and Gerhold 2012).

*The Plan should incorporate other factors that have a greater impact on wildlife, such as the increase in commercial and residential development, polluted air and water.*

SWAP 2015 includes a list of many additional threats to wildlife (Chapter 4), and specifies conservation actions that address all threats (Chapter 6).

*The Plan should advocate for expanded TNR efforts, to ensure that all outdoor cats are sterilized and vaccinated against rabies and other diseases which may be transmissible to wildlife.*

This is not appropriate to the stated goals of the plan to conserve rare species and critical habitats. Under the current TNR scenario, this would not be feasible for the estimated 20,000–40,000 feral cats in the District (Gerhold 2012).

*People who care for DC's community cats won't participate in a catch and kill program as they do with TNR, leaving more unsterilized and unvaccinated cats roaming our streets.*

DOEE cannot address this comment. The goal of SWAP 2015 is to conserve rare species and critical habitats.

*DOEE should consult with local agencies currently conducting TNR in the District before finalizing any plan.*

Language in the plan must focus on actions that will minimize all threats to SGCN. Discussion of how that can be implemented will begin after the plan is approved by the USFWS. DOEE will meet with TNR groups after the plan is finalized.

*The Wildlife Action Plan should not rely on input from national organizations known to be opposed to DC's current TNR policy. The Wildlife Action Plan was developed without consulting with the Washington Humane Society.*

> DOEE relied on input from more than 40 stakeholders. Most were federal land managers (NPS), academics, and local conservation organizations which could provide support in assessing species' population trends, listing SGCN, assessing threats to SGCN and critical habitats, and discuss potential conservation actions.

*The data being relied on is outdated junk science which has been widely criticized by scientists*

> The papers cited have been critically reviewed in peer-reviewed publications. DOEE has found no published, peer-reviewed repudiations of the papers cited.

*Rounding up feral cats is unrealistic. Suggesting that feral cats be sent to indoor facilities for adoption indicates a total lack of understanding of feral cat biology.*

> The plan refers to the threats of all free-roaming cats, which includes feral cats, abandoned pets, and outdoor pets. Abandoned pets and outdoor pets are adoptable. Young feral cats are adoptable (Alley Cat Allies).

*Euthanizing cats is inhumane.*

> The plan does not endorse euthanasia of cats.

*TNR practitioners do not relocate feral cats to National Park Service land. This statement is without any factual basis.*

> NPS staff have informed DOEE of other occurrences of feral cats on NPS property. DOEE has found and photographed ear-tipped cats in Poplar Point, Kenilworth Aquatic Gardens, and Rock Creek Park, far from urban areas. If they are part of TNR colonies, this is evidence that these cats can roam more than ½ mile from TNR colonies.

*Feral cats are a part of the balance of nature.*

> While change and disturbance in any ecosystem is constant, ecological systems can become significantly disrupted when invasive species are present and dominant. Invasive species are species that are not native to the ecosystem in question (meaning they arrived with human assistance of some sort), and by their presence cause economic harm, harm to human health, or harm to the environment. Free-ranging cats alter the ecological balance of a region, as would any other non-native animal. The domestic cats fit this definition, as do Norway rats, European starlings, northern snakehead and many other animals and plants.

*Focus on educating and fining cat owners who abandon cats of allow pest to roam outdoors.*

> This is a potential item that would be included in DOEE's suggestion to revisit the TNR program.

*Education and outreach on spay and neuter programs.*

> This is a potential item that would be included in DOEE's suggestion to revisit the TNR program.

*Limited use of euthanasia in critical habitats may be acceptable, but not as the primary strategy citywide.*

> This is a potential item that would be included in DOEE's suggestion to revisit the TNR program.

*This bill should be dropped.*

> SWAP 2015 is not a bill, nor is it a policy document.

*Cats are not an invasive species.*

> Invasive species are species that are not native to the ecosystem in question (meaning they arrived with human assistance of some sort), and by their presence cause economic harm, harm to human health, or harm to the environment. Domestic cats fit this definition, as do Norway rats, European starlings, northern snakehead and many other animals and plants.

*Plan to end TNR is cruel and inhumane.*

> SWAP 2015 suggests revisiting the TNR policy. No specifics were included.

*Threats to birds from cats are incorrect and not confirmed. Estimations are based on weak and questionable methods. Researchers were biased.*

> The papers cited have been critically reviewed in peer-reviewed publications (Blancher 2013).

*Feral cats are a part of my community.*

> SWAP 2015 is primarily concerned with restoring critical habitat for SGCN. That habitat is typically not in urban and suburban part of the District, but much of the critical habitat is close to developed areas. DOEE is concerned by the number of cats seen and documented in undeveloped habitat areas, and much less concerned about colonies of cats in alleys.

*The American Bird Conservancy was consulted but the Washington Humane Society was not. This constitutes favoritism. No agency should formulate a plan with a group that has well-known bias against cats.*

> DOEE relied on input from more than 40 stakeholders. Most were federal land managers (such as NPS), academics, and local conservation organizations who could provide support in assessing species' population trends, listing SGCN, assessing threats to SGCN and critical habitats, and discuss potential conservation actions.

*What is the provenance of your data and is it correct? What data shows proof bird populations are declining? What is the accuracy of that data? Who collects the data?*

> The sources for bird population trends data are cited in SWAP 2015 in section 2.3

*Is there proof that feral cat populations are increasing? Is there evidence of cats influencing bird population decline?*

> SWAP 2015 does not assert that feral cat populations are rising. WHS estimated that there are 20,000 feral cats in the District. The threat of free-roaming cats is based on several studies that are cited in SWAP 2015.

*Who is counting feral cats?*

> No formal surveys of cats in natural areas have been done in the District. Cats have been photographed by DOEE biologists in many locations, including national parks. Cats have been recorded in meso-mammal track plate studies as well.

*TNR practice is in jeopardy of being discontinued.*

> SWAP 2015 suggests that the District revisit TNR program.

*Feral cats are fed by people and reside in populated urban environments. Urban cats are not a threat to birds.*

> Free-roaming cats have been found to hunt effectively in urban and suburban settings. Fed cats are more effective predators than those that subsist on their own hunting skills (Baker et al 2008), and even well-fed cats will prey on native wildlife (Hildreth 2008).

*The plan does not represent the diversity of the DC region by including areas of the region of the District, but excluding stakeholders from outside the District.*

> SWAP 2015 is limited to the District. DOEE relied on input from more than 40 stakeholders. Most were federal land managers (such as NPS), academics, and local conservation organizations that operate both in the District and regionally. These groups provided support in assessing species' population trends, listing



SGCN, assessing threats to SGCN and critical habitats, and discuss potential conservation actions.

*There is no evidence that "Cats Indoors" programs have any effect.*

All conservation actions that might reduce the impacts of invasive species on SGCN and critical habitats are listed as potential actions.

**Support**

The following is a summary of points raised in comments and testimony received in support of DOEE's position on free-roaming cats in SWAP 2015. DOEE responses are in block quotes.

TNR has been shown through unbiased studies to be ineffective at reducing feral cat populations.

DOEE agrees.

Great concern because of the risk (if not likelihood) of my two young sons contracting toxoplasmosis. On a daily basis, we have feral cats in our front and rear yards, depositing their feces and urine, where my children are exposed.

DOEE agrees that free-roaming cats can pose a transmission threat to humans, but transmission of Toxoplasmosis to SGCN and other animals is more properly the concern of SWAP 2015.

*Any responsible wildlife management program must include strategies for management of free roaming cats. The depredation on wildlife by cats as well as the increase in toxoplasmosis from cat feces must be a concern that is addressed. The recent national trend to elevate one species over all others to the detriment and potential eradication of less favored species is not one I support.*

DOEE agrees. In SWAP 2015 DOEE, as instructed by Congress and USFWS, assessed rare and declining species of many animal taxa.

*Protect our wildlife by removing feral cats. Not only will you be protecting wildlife but also protecting the right of citizens to enjoy the DC area without having to worry about coming in contact with toxoplasmosis and rabies.*

DOEE agrees that free-roaming cats can pose a transmission threat to humans, but transmission of Toxoplasmosis and rabies to SGCN and other animals is more properly the concern of SWAP 2015.

*TNR is ineffective within open populations.*

Research supports this statement (Longcore et. al. 2009).

*No other invasive exotic animal threatens DC wildlife more than the feral or day-wandering house cat.*

As listed in SWAP 2015 many species of invasive animals threaten SGCN and habitats.

*Cats kill billions of animals each year in the U.S. Each cat can kill 200 or more animals a year. Hungry or not, cats hunt, and they are efficient killers. Despite their popularity as pets and important place in our culture, cats do not belong anywhere near DC parks.*

DOEE cited research as such, but has not done extensive surveys in the District.

*Even a spayed or neutered cat will kill rabbits, chipmunks, wood thrush, and many other of the District's wild inhabitants.*

DOEE cited research as such, but has not done extensive surveys in the District.