MONTANA AUDUBON

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Dear Benton Lake National Wildlife Refuge Complex and US Fish and Wildlife Service Staff,

Please accept the following comments on behalf of Montana Audubon and Five Valleys Audubon on the *Draft Comprehensive Conservation Plan and Environmental Assessment* (Draft Plan): *Benton Lake National Wildlife Refuge Complex*. We know that extensive work that has gone into developing this refuge-wide plan, and we appreciate the opportunity to comment and the additional time to review the draft plan and prepare comments.

Montana Audubon represents approximately 3,800 Audubon members in the state. Five Valleys Audubon represents approximately 500 members in Missoula and the surrounding area. Although our membership is diverse, there is a consistent deep concern for wildlife and wildlife habitat in the state. Protection and enhancement of Montana's Wildlife Refuges and Important Bird Areas is a priority issue for Audubon in Montana. You may receive comments from other members in the Society, and especially from our local Upper Missouri Breaks Audubon Society Chapter, based in Great Falls.

Over the past two years we have participated in the development of the Benton Lake Comprehensive Conservation Planning (CCP) process and recommendations, providing comments during the scoping process, participating in the workshop held in June 2011, as well as consulting with refuge staff during the development of the Draft Plan. We have reviewed the draft Refuge complex CCP with particular attention to the alternatives proposed for Benton Lake National Wildlife Refuge (NWR). Our comments are focused on Benton Lake NWR because of the significant changes being proposed for the refuge in this Draft Plan, as well as the recognition that this refuge is one of forty Important Bird Areas (IBAs) identified in Montana.

As background, Benton Lake NWR is recognized as an Important Bird Area because of the presence of wetland- and grassland- dependent species. As you know, the refuge has one of the largest known breeding population of Black-necked Stilts in Montana and the largest nesting colony of Franklin's Gulls in Montana. It is also visited during spring and fall migration, by up to 150,000 ducks, 25,000 geese, 5,000 swans, and as many as 50,000 shorebirds. In addition, Benton Lake NWR is home to grassland species of conservation concern like the Chestnut-collared Longspur. Indeed, the significance this refuge plays for migratory and breeding wetland-dependent birds, as well as breeding grassland-dependent birds elevated this site to an IBA. This combination of habitats also explains why so many local birders—and birders from across Montana—come to Benton Lake NWR.

Given our understanding of the significant ecological health issues facing Benton Lake, we have been challenged by—and at times conflicted about—the best approaches for setting this refuge on the best track long-term. In the last fifty years, Benton Lake NWR has served as a wildlife "shock absorber" for a large part of central Montana. This region of the state has seen incredible losses of wetlands due to draining and crop conversions. In addition, crop conversions in this region have also reduced native grasslands. Together, the enhanced wetlands and grasslands found at the refuge have played a significant role offsetting habitat loss by providing excellent habitat for resident and migratory birds.

Proposed Alternatives

To begin, we strongly agree that the "no action" alternative is not an acceptable alternative, as changes in management are needed to address the significant issues of increased selenium concentrations, invasive species encroachment, botulism, and other problems addressed in the Draft Plan.

As organizations, Montana Audubon and Five Valleys Audubon generally consider operating and/or restoring ecological systems to their natural state to be the best desired outcome. However, after considerable analysis of the management options available for Benton Lake NWR, we believe that abruptly returning this refuge to a "natural management" regime, Alternative C, is not appropriate. We've come to this conclusion after considering the history of Benton Lake, the importance of enhanced wetlands to migratory and breeding wetland-dependent birds in central Montana, the importance of maintaining a combination of wetland and grassland-dependent species close to a major city, and the potential for success in improving the health of Benton Lake NWR habitats through active and strategic water management. Such an approach (a variant of Alternative B1) could provide more reliable bird habitat to the suite of species that rely on Benton Lake wetlands, and could build healthier, more sustainable, biologically diverse wildlife habitat on the refuge long-term. The continued use of wetland infrastructure and implementation of science-based wetland management techniques in an adaptive management framework could mimic dynamic flooding and drying cycles and create more mudflat and shallowly-flooded areas than the current water management does. This management regime could, in turn, result in more extensive and productive habitat for shorebirds. In addition to wetland habitats, grassland habitats and their associated species could continue to thrive.

Our conclusion to support a variant of Alternative B1 is also based on a historical perspective when it comes to our Refuge system nationally. In the refuge system, we understand that various wetland and water-based inland refuges were specifically purchased and managed to, in part, mitigate the loss of wetlands from agricultural tillage and human development. Benton Lake plays this role well in central Montana. So the fact that Benton Lake NWR provides altered habitats, with an enhanced wetland complex, which were not historically present, does not necessarily warrant change.

There are several other reasons to support maintenance of enhanced wetland systems at Benton Lake NWR. To begin, as stated in our February 2011 letter to refuge staff, the value of delivered water to augment and enhance wetland habitat cannot be overstated as Benton Lake NWR becomes warmer because of climate change. Given climate change trends, Benton Lake will likely become even more critical as a nesting and staging area for waterfowl on the northern Great Plains.

Second, although we appreciate the Refuges' interest in reducing its energy use and cost associated with water pumping, we believe that there are feasible systems that would allow Benton Lake NWR to increase its energy self-sufficiency. We support increasing solar electricity generation around the building complex. We encourage staff to assess the feasibility of micro-hydro systems in which energy from the water moving through the pipes is captured and incorporated into the pumping system. We do not know what is most feasible or cost effective at this time, but encourage research in this arena.

Finally, and perhaps most importantly, we will restate from our February 2011 letter: as an accessible wetland complex so close to Great Falls, we cannot stress enough how valuable this area is to local birders,

educators, and other wildlife enthusiasts. We have members who "bird" at the Refuge regularly throughout the year; some of these members have returned year in and year out to Benton Lake for thirty or more years. A Refuge so close to one of Montana's largest cities needs to be managed in a way that adds value to the resource, as well as the people who cherish it. The opportunity to visit Benton Lake NWR—to view the birds attracted to this special place—is simply a high value experience to Montana Audubon and many of its members.

Other Issues That Need Addressing

Montana Audubon and Five Valleys Audubon also support the following management solutions proposed in the Draft Plan:

- To address selenium, we strongly support specific plans to reduce inputs from adjacent private lands. We encourage refuge staff to pursue this option.

- We support removing trees that have been planted on the refuge, especially non-native trees such as Russian olive. The presence of trees creates two major problems for grassland birds. First, it encourages predation on grassland species by providing a perch for avian predators that would not normally be found in this habitat. Second, it fragments habitat. Outside of woody draws, most of this habitat is devoid of all trees. Grassland areas with trees are often avoided by grassland birds. As an example, during their breeding season Long-billed Curlews are found in "the simplest, most open habitat available" as they are "avoiding trees, tall weedy vegetation, and tall dense shrubs ..." (Fellows and Jones 2009). Native grassland habitat is relatively rare on the landscape in central Montana, as much of the land has already been converted to agriculture. Thus, the conservation and restoration of remaining grassland habitat patches is critical to the persistence of the bird species that depend on them.

Conclusion

Thank you for this opportunity to comment on this draft CCP. We continue to hope that the USFWS can respond to the myriad challenges at Benton NWR in a way the preserves the value of habitat for such a rich array of species. Please keep us apprised of the management directions for the Benton Lake NWR. We remain committed to working with the Refuge, other organizations and agencies, and interested citizens to significantly improve the management system and conditions at the Refuge.

Please let us know if you have questions or need clarification regarding these comments.

Sincerely,

Amy Cilimburg
Director of Bird Conservation, Montana Audubon

Jim Brown
Five Valleys Audubon

cc Senator Max Baucus
Senator Jon Tester