



Delmarva
Ornithological
Society

PO Box 4247
Wilmington, DE 19807

November 12, 2015

To: Elena M. Stewart
Land Preservation Specialist
Delaware State Parks
89 Kings Highway
Dover, Delaware 19901

Re: Delaware Open Space Council Standards and Criteria

Submitted Electronically

Dear Ms. Stewart,

The Delmarva Ornithological Society (DOS) would like to submit the following comments to the Delaware Open Space Council regarding the Land Protection Act Draft Standards and Criteria currently being considered by the Open Space Council.

DOS is an *all-volunteer* 501(c)3 nonprofit representing more than 500 members in Delaware and adjacent areas. Our mission is the promotion of the study of birds, the advancement and diffusion of ornithological knowledge, and the conservation of birds and their environment.

DOS has contributed private funding from our annual Delaware Bird-a-Thon event as non-federal match for several acquisition projects involving Open Space funds, including the Yardley Dale, Morris, and Bennett acquisitions by the Delaware Division of Fish and Wildlife.

The DOS Conservation Committee would like to express our strong support for the continued role of the Open Space Council and Open Space funding in protecting critically important bird habitat throughout Delaware, including the projects mentioned above.

We strongly encourages the Council to adopt criteria referencing Species of Greatest Conservation Need (SGCN), as proposed in the draft standards and criteria. Further, we encourage the adoption of the proposed criterion referencing migration corridors, and suggest that state spatial data (such as the Delaware Ecological Network), as well as state spatial data on bird migration hotspots, as well as other appropriate state, regional, and national data be used to identify lands meeting this criterion.

The League of Women Voters of Delaware has commented that they believe that lands "which will be inundated under the most conservative of the [Sea Level Rise] scenarios (.5 meter) ought to be removed from the SRA list/maps." DOS respectfully disagrees with this suggestion and urges the Open Space Council not to place restrictions on acquisition based upon projected future sea level rise.

Land subject to future inundation meets the important draft criterion of "land that will allow natural systems or plants and animals to accommodate or adapt to climate change or other large-scale changes in ecosystem processes." These transitional and dynamic areas are often near the interface of upland and marsh, and appropriate management, restoration (such as conversion from agricultural production to native herbaceous vegetation), or green infrastructure engineering may help maintain or improve habitat while allowing coastal systems to migrate inland. Furthermore, the possibilities for funding and conducting Sea Level Rise adaptation practices on lands that will be subject to future inundation may be increased by state ownership.

Finally, the DOS Conservation Committee recognizes that Delaware's birds and other wildlife species and their habitats face significant threats from development, fragmentation, and climate change, at a time when both federal and state funding for species conservation is in decline. Therefore we believe that within the "evaluation system" that will be developed to help prioritize lands for Open Space funds, the Council should consider weighting those standards and criteria that incorporate wildlife and natural habitat more heavily relative to other proposed criteria.

Sincerely,

A handwritten signature in cursive script that reads "Matthew Sarver". The signature is written in black ink on a light-colored background.

Matthew Sarver, Conservation Chair