

***New Jersey Chapter
The Wildlife Society***



Public Comments Processing
Attn: Docket No. FWS-HQ-ES-2018-0004
Division of Policy, Performance, and Management Programs
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: BPHC
Falls Church, Virginia 22041-3808

RE: John H. Chafee Coastal Barrier Resources System; Hurricane Sandy Remapping Project for Delaware, Massachusetts, New Hampshire, and New Jersey

May 22, 2018

Dear U.S. Fish and Wildlife Service:

The New Jersey Chapter of The Wildlife Society (NJTWS) recommends reconsideration of NJ-07P (Little Egg Inlet) as a full System Unit, currently mapped as an Otherwise Protected Area (OPA) within the Coastal Barrier Resources System. As an OPA the only federal expenditure prohibition is that related to Federal flood insurance, which has very little bearing on areas within NJ-07P since, based on current regulations, none of the areas provide buildable land. However, protection as a full System Unit would provide full protection from federal expenditures beyond Federal flood insurance that could result in the loss or adverse impact of this important coastal inlet and adjacent beach and marsh areas.

Little Egg Inlet is the only unmodified (i.e. natural) inlet between New York and Virginia, a shoreline distance of about 350 miles. It supports federally designated Wilderness Area, part of Edwin B. Forsythe National Wildlife Refuge on both sides of the inlet. It is New Jersey's second largest concentration of nesting piping plovers (*Charadrius melodus*), a federally listed threatened species. It is also an important fall stopover habitat for the federally threatened red knot (*Calidris canutus rufa*). NJ-07P also

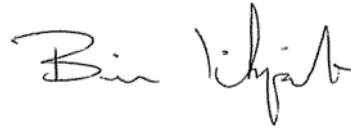
The Wildlife Society (TWS), founded in 1937, is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals to conserve diversity, sustain productivity, and ensure responsible use of wildlife resources for the benefit of society. The Wildlife Society encourages professional growth through [certification](#), peer-review [publications](#), [conferences](#), and [working groups](#).

provides habitat for the federally threatened seabeach amaranth (*Amaranthus pumilus*). Unmodified inlets provide optimal habitat for all three of these listed species. This inlet is also part of the Jacques Cousteau National Estuarine Research Reserve.

The Coastal Barrier Resources Act (CBRA) encourages the conservation of hurricane prone, biologically rich coastal barriers by restricting federal expenditures and financial assistance that encourages development. Similar to rationale used to map NJ-09 (Hereford Inlet) as a full system unit, the Little Egg Inlet (NJ-07P) should also be considered and mapped as a full system unit. These critical inlets and the adjacent habitats that they support are among the few remaining natural inlets in New Jersey, which is one of the reasons why they continue to support a variety of federally listed and at-risk species. The Little Egg Inlet is neither a Federal nor a State navigation channel.

Little Egg Inlet (NJ-07P) supports habitat for three federally listed species, in large part because is the only natural inlet in the northeast region. Therefore, NJTWS encourages the U.S. Fish and Wildlife Service to remap NJ-07P (Little Egg Inlet) as a Full System unit under CBRA to afford it the full protections offered by this legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Kirpatrick". The signature is fluid and cursive, with the first name "Brian" being more prominent than the last name "Kirpatrick".

Brian Kirpatrick, CWB
Vice President
New Jersey Chapter of The Wildlife Society

Cc: Senator Robert Mendendez
Senator Cory Booker
Congressman Frank Lobiondo