



## Audubon Society of Rhode Island

March 16, 2025

Terrence Gray, Director  
Rhode Island Department of Environmental Management  
235 Promenade Street, Providence, RI 02908

Dear Director Gray:

Audubon Society of Rhode Island, representing our 17,000 members and supporters, strongly opposes any process that would develop Gould Island for recreational or other uses.

The Jamestown Town Council is advocating for passive recreation, including overnight camping, on Gould Island. Gould Island, a 53-acre island in Narragansett Bay, has been a state-owned wildlife sanctuary since 1989. It supports key species, including American Herring Gull, Great Black-backed Gull, Double-crested Cormorant, Black-crowned Night Heron, and American Oystercatcher.

A recent letter from you to the U.S. Army Corps of Engineers states, "the department anticipates the future use of the island will be for expanded public recreational use, including overnight camping." This recommendation includes the removal of a wildlife sanctuary deed restriction placed on the island when it was given to the state of Rhode Island from the Department of the Navy.

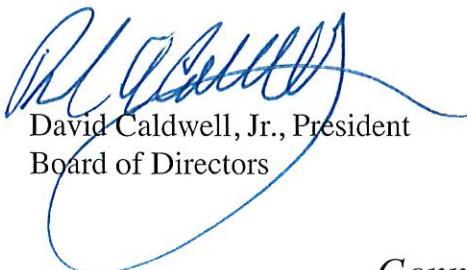
According to DEM's own collaborative efforts with the state's leading avian researchers, Gould Island supports four waterbird species included in DEM's Wildlife Action Plan as Species of Greatest Conservation Need. While the Restoration Advisory Board believes that their plan minimizes any danger to bird populations on the island, many researchers do not agree and are concerned about critical species.

The southern 39 acres of Gould Island has been a designated wildlife sanctuary, with the northern-most 14 acres still owned by the Navy. Any petitioning to remove the designation and deed restriction sets a dangerous ecological precedent for Rhode Island. Land that is protected for wildlife is essential to combating the loss of biodiversity, both regionally and globally, from habitat loss, climate change, and human resource consumption.

The waterbirds that breed on Gould Island require undeveloped and undisturbed habitat for their success. Removing a wildlife sanctuary deed restriction is tantamount to removing safe refuge for wildlife in need of conservation action.

Audubon Society of Rhode Island, along with our coalition partner Save The Bay, is calling for the immediate end to any consideration for the development of Gould Island.

Sincerely,



David Caldwell, Jr., President  
Board of Directors



Jeffrey C. Hall  
Executive Director

*Connecting All People With Nature*