

Appendix 0



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Common goldeneye

Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Lake Umbagog National Wildlife Refuge

Table of Contents for Service Responses to Comments by Subject

1.0 Planning Process and Policy 0-3

 1.1 Timeframes/Length of Comment Period. 0-4

 1.2 Public Involvement. 0-4

 1.3 Relationship to Other Planning Processes. 0-6

 1.4 Statutory Authority 0-7

 1.5 Jurisdiction 0-9

 1.5.a Dam Operations 0-10

 1.6 Implementation 0-11

 1.7 Agency (General comments, including trust and integrity). 0-11

 1.8 Coordination and Consultation 0-13

 1.9 Document (Clarity, Technical and Editorial) 0-15

2.0 Purpose and Need 0-17

 2.1 Scope 0-18

 2.2 Proposed Action 0-18

 2.3 Refuge Vision and Goals 0-18

 2.4 Issues Identified During Public Scoping Process 0-19

 2.5 Issues and Concerns Outside the Scope 0-19

 2.6 Monitoring and Evaluation. 0-19

 2.7 Cumulative Effects 0-20

3.0 Alternatives 0-21

 3.1 Alternative A: Current Management 0-21

 3.2 Alternative B: Service-preferred Alternative. 0-22

 3.3 Alternative C 0-23

 3.4 Actions Common to All Alternatives 0-24

 3.5 Actions Common to Alternatives B & C Only. 0-24

 3.6 Alternatives or Actions Considered but Eliminated 0-24

 3.7 Range/Comparison of Alternatives 0-25

4.0 Refuge Physical, Biological and Socioeconomic Resources 0-26

5.0 Refuge Administration 0-29

 5.1 Land Acquisition 0-32

 5.2 Buildings and Facilities 0-37

 5.3 Staffing and Funding. 0-41

 5.4 Road System 0-42

 5.5 Enforcement 0-42

 5.6 Volunteer and “Friends” Group 0-43

 5.7 Visitor Services 0-43

6.0 Social and Economic Values. 0-43

 6.1 General Management Direction 0-43

 6.2 Local Economy 0-44

 6.2.a Tourism 0-45

 6.2.b Property Tax 0-45

 6.3 Social Values 0-50

7.0 Air Quality 0-50

8.0 Hydrology and Water Quality 0-51

9.0 Soils 0-51

10.0 Open Water and Wetland Habitat & Species. 0-51

 10.1 General Management Direction 0-51

10.2	Open Water	0-51
10.2a	Invasive Species	0-51
10.3	Wetland Habitats (Fen & Flooded Meadow, Boreal Fen & Bog, Northern White Cedar Swamp; Scrub-Shrub Wetland)	0-52
10.4	Fish and Wildlife Species	0-52
10.4.a	Common Loon	0-52
10.4.b	Fish (e.g., brook trout)	0-54
10.5	Furbearer Management	0-54
11.0	Floodplain, Lakeshore, and Riparian Habitats and Species	0-55
11.1	General Management Direction	0-55
11.2	Habitats (Wooded Floodplain; Lakeshore Pine-Hemlock; Vernal Pools)	0-55
11.3	Wildlife Species	0-55
11.3a	Bald Eagles and Osprey	0-55
11.3b	Woodcock	0-55
12.0	Upland Forest Matrix Habitats and Species	0-55
12.1	General Management Direction	0-55
12.2	Habitats (Spruce-Fir; Mixed Woods; Northern Hardwoods)	0-55
12.2	Habitats	0-57
12.3	Wildlife Species—Mammals	0-57
12.3a	Lynx	0-57
12.4	Wildlife Species—Avian	0-57
13.0	Cultural and Historic Resources	0-58
13.1	General Management Direction	0-58
14.0	Priority Public Uses	0-58
14.1	General Management Direction	0-58
14.2	Visitor Safety	0-59
14.3	Access	0-59
14.4	Hunting	0-61
14.4.a	Waterfowl	0-63
14.4.b	Game or Other	0-63
14.5	Fishing	0-63
14.6	Viewing and Photographing Wildlife	0-64
14.7	Interpretative and Environmental Education	0-65
15.0	Other Public Uses	0-65
15.1	Remote Camping	0-66
15.2	Boating	0-67
15.3	Snowmobiling	0-67
15.4	Off Road Vehicle Use [ATVs, UTVs, dirt bikes and other off-road vehicles not legal for highway use]	0-68
15.5	Hiking	0-69
15.6	Uses Determined Inappropriate	0-69
15.6a	Bicycling	0-70
15.6b	Horseback Riding	0-70
15.6c	Berry Harvesting	0-71
15.6d	Dog Sledding or Mushing	0-71
15.7	Other Non-motorized Recreation	0-72
16.0	Appendixes	0-72
17.0	Comments Considered Out of Scope	0-73

Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Lake Umbagog National Wildlife Refuge

August 29, 2008

Introduction

In June 2007, we completed the “Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Lake Umbagog National Wildlife Refuge.” That draft outlines three alternatives for managing the refuge over the next 15 years, and identifies alternative B as the “Service-preferred Alternative.” We released the draft for 45 days of public review from July 6 to August 20, 2007. In response to public request, we extended that period another 32 days, to September 21, 2007.

We evaluated all the letters or e-mail we received and the oral testimony we recorded in our public hearings during that period. This document summarizes the public comments that raised issues and concerns within the scope of this final CCP/EIS and our responses to them. Based on our analysis in the draft CCP/EIS and our evaluation of those comments, we have modified alternative B, which remains our preferred alternative in the final CCP/EIS. Our modifications include additions, corrections, or clarifications of our preferred management actions. We have also determined that none of those modifications warrants our publishing a revised or amended draft before publishing the final CCP/EIS.

These are some important changes in the final.

1. In response to concerns about impacts on the local economy, our expansion proposal replaces some acquisitions in fee title with acquisitions of easements in Maine, and reduces their total number of acres. We now propose to acquire from willing sellers 47,807 acres (formerly, 49,718 acres), and have changed the acquisition ratio to 56 percent in fee title and 44 percent in easement (formerly, 65 percent fee and 35 percent easement). Appendix A, “Land Protection Plan,” describes that revised proposal.
2. Two new maps clarify our proposal on the roads and trails we would open for public use on both current refuge lands and refuge expansion lands. Chapter 2, “Alternatives Considered, Including the Service-preferred Alternative,” clarifies them in maps 2–8 and 2–9. Item 6, below, describes them.
3. We propose to postpone our decision on whether to manage furbearer species, and whether that management could include trapping. We will conduct further analysis and prepare a more detailed Furbearer Management Plan. That change, which we propose in both alternatives B and C, appears in chapter 2, in the section “Actions Common to Alternatives B and C Only.” Before trapping would be permitted under the Furbearer Management Plan, we will analyze the appropriateness of this use and issue a compatibility determination, if warranted, analyzing whether this use would be compatible with the mission of the National Wildlife Refuge System and refuge purposes, and under what conditions.
4. In the same section of chapter 2, we propose to postpone our decision on whether to expand our current hunt program by incorporating bobcat hunting in Maine and turkey hunting in Maine and New Hampshire. Although that would have made our hunt program consistent with the states’ hunt programs, we have determined the need to conduct further analysis in conjunction with an environmental assessment and additional public comment before revising our hunt plan. We propose that change in alternatives B and C. If the hunt program is expanded, we will issue a new compatibility determination with any changes to the program necessitated by the expansion.

5. The same section of chapter 2 also clarifies our hunting and fishing programs. The public comments we received reveal the misperception that our implementing alternatives B or C would result in new restrictions in those programs. That is not the case. We now explain the hunting and fishing programs better, and point out that we intend to implement them on any newly acquired lands.
6. We revise alternative B to allow, in designated areas, certain public uses that we originally planned not to allow: dog sledding, horseback riding, bicycling, and collecting certain berries, fiddleheads, mushrooms, and antler sheds for personal use.
7. We have replaced the Fire Management Plan in appendix I, with a new document titled “Fire Management Program Guidance.” Since the draft CCP/EIS was published, new requirements have been developed for fire management plans (FMP) that include interagency cooperation, consistency in terms of common language and format, and the need to address fire at a landscape scale across ownerships. The FMP published in the draft CCP/EIS does not meet the new standards. In the interim, while we prepare a new FMP, we provide the program guidance document to share our policy and strategic guidance on fire management on this refuge.

Our regional director will issue a final record of decision (ROD), after

- our director reviews and approves the land protection plan,
- we provide the final CCP/EIS to interested or affected parties for a 30-day period of review, and
- our regional director reaffirms that the final CCP achieves the purposes for which the refuge was established, helps fulfill the mission of the Refuge System, and complies with all legal and policy mandates.

Once he has signed and dated the ROD, we will publish a notice of the availability of the final documents in the *Federal Register*. That notice will complete the planning phase of the CCP process, and we can begin its implementation phase.

Summary of Comments Received

Because of the volume of comments we received and our interest in an objective analysis of them, we enlisted the U.S. Forest Service Recreation Solutions Enterprise Team in compiling a database and preparing a summary report. That team has particular expertise in providing unbiased summations of public comments on major proposals by federal land management agencies, a process called content analysis. The team evaluated and coded all of our public letters, e-mails, and transcripts. We posted the summary report, which sorts the comments into subject headings by issue, on the website <http://www.fws.gov/northeast/planning/Lake%20Umbagog/ccphome.html>. Our responses below follow the organization of their report, and we encourage a reading of it before reading our responses.

During the comment period, we received 14,269 responses, both oral and written. Organized response campaigns (forms) represent 97 percent (13,848) of that total.

We gathered oral comments in two informal information sessions and five formal public hearings.

- July 10, 2007: Errol Town Hall, Errol, New Hampshire (information session)
- July 30, 2007: Errol Town Hall, Errol, New Hampshire (public hearing)
- July 31, 2007: Bear River Grange, Newry, Maine (public hearing)
- August 1, 2007: Berlin Technical Community College, Berlin, New Hampshire (public hearing)
- August 6, 2007: New Hampshire Fish and Game Office, Concord, New Hampshire (public hearing)
- August 7, 2007: Holiday Inn, Augusta, Maine (public hearing)
- August 16, 2007: Errol Town Hall, Errol, New Hampshire (information session)

Three hundred seventy-eight people attended the public hearings; 55 presented oral testimony, which we recorded and later transcribed. Some who attended the hearings submitted their comments in writing instead of

as oral testimony, while others did both. We received written responses in 164 letters (9 of which we also received as email), 1 fax, and 14,049 e-mails.

We received comments from these government agencies and elected officials.

Maine Department of Inland Fisheries and Wildlife
Maine Land Use Regulation Commission
New Hampshire Department of Fish and Game
New Hampshire Department of Resources and Economic Development, Division of Forests and Lands
Executive Councilor, District 1, State of New Hampshire
State Senator, District 1, State of New Hampshire
City of Berlin, New Hampshire
Capitol Region Council of Governments, State of New Hampshire

We also received comments from these individuals or organizations.

14 conservation and preservation organizations
6 recreational organizations
5 animal rights groups
4 timber or wood products industry or associations
3 hunting and fishing sports clubs
2 energy industry companies
1 civic organization
1 outfitter/guide

In the discussions below, we address every comment the FS report identifies. Occasionally, the FS placed the same comment under two or more subject headings. In our responses, we often refer the reader to other places in this document where we address the same comment. Under a few subject headings, we introduce more detail on an issue than the FS report provides. That was simply a matter of our knowing the issue in greater detail, or our having conversed with the person who submitted the comment, so that we knew its gist better.

Directly beneath each subject heading, you will see a list of unique letter ID numbers that correspond to the reviewer letters. The cross-referenced list appears as attachment 1 to this appendix.

In several instances, we refer to the full text version of the draft CCP/EIS, and indicate how the final CCP/EIS reflects our proposed changes. You have several options for obtaining the full text version of either the draft or the final CCP/EIS. They are available online at <http://library.fws.gov/ccps.htm>. For a CD-R or a print copy, contact the refuge headquarters.

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Service Responses to Comments by Subject

1.0 Planning Process and Policy

(Letter ID#: 3, 90, 128, 134, 138, 149, 439)

Comment: Several commenters complimented our draft CCP/EIS, stating that we had done a “thorough job of scoping” and research, provided an “excellent summation,” and offered “a set of well constructed alternatives.” One reviewer, however, suggested that we revise and reissue the document as a “draft” for public review with the

“errors, omissions, and false materials corrected” so that the public could assess more accurately their beneficial or adverse effects.

Response: We appreciate the favorable reviews, and acknowledge the criticisms. These documents contain more than 700 pages of material we compiled from hundreds of sources. Given that volume, we believe it is reasonable to expect some errors. That is one reason we initially publish a draft. We were impressed that so many people reviewed the draft in detail, and took the time to point out its typos and factual errors, suggest changes in its wording and mapping, or share their opinions or analyses. That level of scrutiny ensures that the final documents are complete and understandable.

We regret that we published errors, and that they might have confused our readers. We try to correct them in the final CCP/EIS. None of the corrections, however, modify the proposals or analyses in our original alternatives to the extent that they are either baseless, invalid, or require publishing a revised draft. The discussions of specific topics below identify many of those corrections.

Without specific examples, we cannot respond directly to the comment that omissions or false materials make thoroughly assessing the alternatives difficult. We did not intentionally omit any information, nor did we include false materials to influence any outcome.

1.1 Timeframes/Length of Comment Period

(Letter ID#: 90, 121, 128, 135)

Comment: Several people commented that they appreciated the 32-day extension of the comment period for the draft CCP/EIS. One mentioned that the extension, coupled with our information sessions, allowed them to more thoroughly “digest all the materials” before commenting. However, another criticized the planning schedule, mentioning that the timeline we published on our planning webpage called for a “Spring 2007” release of the draft documents and public meetings when, in fact, they occurred mostly in July and August. The same commenter pointed out that the first printing of maps was “illegible,” and this, coupled with perceived inadequacies in public involvement, substantiated the need for more time to fully evaluate the alternatives.

Response: We publish a tentative schedule for all Northeast Region CCPs on our planning website, <http://www.fws.gov/northeast/planning/>. Typically, those schedules span years in displaying the timeline of the process for each CCP from start to final publication. That process is unpredictable, and makes providing exact dates difficult. Some of that uncertainty also arises because of our numerous internal agency and departmental reviews, which we at the planning level do not control. We do provide contact information on our regional planning website, the refuge website, and in planning newsletters and other outreach materials, so that anyone with questions on the process or its timeline has a way to reach us.

Our purpose in holding the two information sessions in Errol and hosting the open houses before the five public hearings was to provide additional opportunities to answer questions and clarify our proposals so that people had the level of information they wanted before they responded. We scheduled those public events midway through the public comment period, so people would have time to reflect on what they heard and ask additional questions before that period ended. We regret the problem with the maps in the first print run of the documents. Our contract printer generously printed the second run free of charge. We recognize that the maps in the first run might have frustrated some reviewers or delayed their comments. However, we made the revised maps available to anyone who contacted us, as well as at our public information sessions and hearings and on our website.

In summary, we feel the 77-day public comment period, which exceeds the 45-day minimum NEPA regulations require, combined with the number of our public information sessions, open houses, and hearings, offered ample opportunity for meaningful public comment on the draft CCP/EIS.

1.2 Public Involvement

(Letter ID#: 3, 4, 5, 10, 24, 35, 50, 63, 69, 85, 91, 93, 107, 111, 112, 135, 136, 138, 151, 152, 198, 199, 200, 257, 307, 326, 351, 352, 420, 594, 600, 706, 899)

Comment: We heard from several people and organizations who expressed their appreciation of the public information sessions or the opportunity to provide public input. Several offered their assistance and future collaboration as we implement the plan and develop more detailed step-down plans. The Maine Land Use Regulation Commission, New Hampshire Wildlife Federation, The Wilderness Society, and a river outfitter were among those who offered their assistance. Others expressed their appreciation for the opportunity to provide public comment, but mentioned some specific concerns about the way we stated the alternatives. Examples include comments from the State Line Snowmobile Club that thanked us for recognizing and receiving public input, but expressed some concerns about the management of snowmobile trails; a dog sled outfitter and guide who appreciated the opportunity to comment at a public meeting, but was concerned about restrictions on sledding; and, New Hampshire Audubon, who thanked us for taking their written comments, but included detailed concerns about migratory bird management. In response, we met with the snowmobile club, the dog sled outfitter, and a representative of New Hampshire Audubon to clarify their concerns and interests. We respond to those concerns and others that relate to specific management programs, activities, or actions under their topic headings below.

Several people criticized the level of public involvement as inadequate, particularly for local residents, and cited various reasons. Some stated that local residents should have had the opportunity to be more involved throughout the entire planning process. One suggested we might have gained more support if we had spent the summer of 2007 presenting a draft outline and talking with local residents and other stakeholders, such as out-of-state property owners, instead of releasing a fully developed draft CCP/EIS. Several mentioned that the comments of local residents should matter more than those from outside the local area. One wrote, “Those letters received from local people that have to live (with) the consequences of your decisions should carry more weight.” Others mentioned that a proposed action directly affects residents in its immediate vicinity, and they should have more influence on the final decision. For example, one person said, “Only the people who reside on or near Sturtevant pond should have the final say on this issue [proposed boat launch].”

We heard from others who were particularly concerned that the public information sessions were not well publicized, precluding the attendance of many who might have wanted to get involved, had they known of them. One person stated that the poor quality of the map we distributed and posted online hampered the opportunity for involvement, and the sizes of the document files we posted on our website made accessing them difficult.

Response: We appreciate those offers of assistance in implementing the final plan or working on more detailed step-down plans. In several topical sections below, we discuss our interest in working locally and regionally with others to accomplish refuge goals and objectives. In chapter 2 of both the draft and the final CCP/EIS, under the section “Actions Common to All Alternatives,” we highlight our desire to maintain our existing partnerships and establish new ones, maintain an active volunteer program, establish a Friends Group, and work harder to become an active, valued member of communities near the refuge.

During the development of the plan we have been active in the community, and have used many of those connections to alert people that the planning process was underway and encourage them to contact the refuge manager if they had any questions. For example, our outreach materials about the planning process were available at refuge events and at our headquarters office. We alerted people through our active involvement in the Coos County Economic Development Plan, NH Leadership Program, and Umbagog Area Chamber of Commerce. We briefed elected officials throughout the planning process. In both the draft and the final CCP/EIS, chapter 5, “Consultation and Coordination with Others,” describes our outreach prior to the release of the draft. We believe the opportunities we describe in chapter 5, in conjunction with the public events and outreach attending the release of the draft, meet the intent of NEPA, its CEQ regulations, and Service policy on public involvement.

We must respectfully disagree with those who think we should value the opinions and concerns of local residents more than those of other citizens. Our proposals strive to find the most appropriate balance between serving the entire American public by meeting our responsibilities as a federal agency entrusted with protecting federal trust resources in a way that fulfills our agency mission and achieves refuge purposes, and being a valued, trusted,

integral member of local communities near the refuge. We recognize that finding that perfect balance can be difficult. Rarely is everyone interested in the refuge satisfied with the direction of all aspects of its management. In fact, a thorough review of the public comments reveals that, even among local residents, there is no consensus on the direction of many aspects of refuge management. That makes finding an appropriate balance all the more challenging. However, in response to local public comments on several issues of public use, access, and recreation, we have modified the final CCP/EIS, alternative B. Please refer to those discussions below.

We would be irresponsible in implementing the consensus or majority opinion when it contradicts federal laws or Service policy. As one example, more than 2,000 people submitted the same comment on our draft CCP/EIS: We should ban the current hunting program on the refuge. Among the comments we received, that was the majority opinion about hunting. However, the Improvement Act and Service policy identify hunting as a priority public use to receive our enhanced consideration during CCP planning and to be accommodated on refuges to the extent it can meet the compatibility threshold. Simply put, we cannot disregard the intent of federal law and policy by eliminating a priority use that is now well established and occurred historically before we established the refuge. We discuss our hunting program more under that topic heading below.

We mailed a notice of our public information sessions and hearings to the more than 1,200 names and organizations on our project mailing list, advertised dates in local papers, posted them on our planning website, distributed a news release with dates to our regional media contacts, made public radio announcements, made announcements at community events, and alerted congressional offices. Announcements were made at least 2 weeks prior to each gathering. We believe this represents a concerted effort to notify people ahead of time.

We acknowledge the poor print quality of the maps in the first run of the draft CCP/EIS. As soon as we could, we rectified that problem in a new printing, and made the maps available at refuge headquarters, at all our public meetings, and to anyone who contacted us about them. The size of the files on our website was likely a problem for anyone on a dial-up modem. We tried to alleviate that problem by posting another set of files at smaller sizes on our website.

1.3 Relationship to Other Planning Processes

(Letter ID#: 98, 112, 135, 172, 352)

Comment: One commenter raised the concern that the Service never completed its “Draft EIS for Refuges 2003” (January 1993), and opined that was unfortunate, because it substantiates the commenter’s concerns about the impacts of hunting and other refuge uses. The commenter asked why the Service never completed that EIS, and felt we should not prepare this or any other CCP until we have completed that programmatic EIS for the Refuge System.

Response: “Refuges 2003” was a draft management plan and EIS the Service prepared “to help guide management of the National Wildlife Refuge System over the next decade.” Its stated purpose was “to meet the many challenges facing fish and wildlife resources and the public’s use and enjoyment of those resources into the 21st century” (Executive Summary, “Introduction,” p 1). The draft fully evaluates seven management alternatives and their expected impacts. At the end of its public review period, the Service began the huge task of analyzing and evaluating the public comments it had received. At the same time, the Service began to develop organic legislation for the Refuge System. That surpassed completing “Final EIS for Refuges 2003,” and resulted in the National Wildlife Refuge System Improvement Act of 1997.

Among other things, the Improvement Act establishes wildlife conservation as the principal mission of the System; reinforces the importance of comprehensive planning on all units of the System; identifies six priority public uses: hunting, fishing, wildlife observation and photography, and environmental education and interpretation; and gives refuge managers uniform direction and procedures for making decisions about wildlife conservation and the uses of the System. Our final CCP/EIS fully complies with the intent of the Act and Service policies.

Comment: One commenter expressed disappointment that in chapter 1, under “Conservation Plans and Initiatives Guiding the Project,” we did not refer to the Northern Forest Lands Study of 1990 and “Finding Common Ground,” the Report of the Northern Forest Lands Council (September 1994), or the Tenth Anniversary Forum Report, Northern Forest Lands Council (2005). Another comment suggested that our interpretation of priorities and goals in the Northern Forest Land Study of 1990 differs from those of local stakeholders, and that our proposed land protection plan implies that federal government controls on land use are superior and preferable to the controls of local or state government. That commenter opined, “local and state governments and agencies would probably have a better handle on what is suitable for the area....”

Response: We used those three reports in developing the final CCP/EIS, appendix A, “Land Protection Plan,” and list them in its section “Literature Cited.” We also cite them in chapter 1, under the section “Other Regional Information Sources.”

As to the comment that our original write-up implied federal ownership was superior to local control, we regret the misunderstanding, because that was not our intent. State, private, local, and non-government partners have been integral in conservation both on the refuge and in the Northern Forest since before the refuge was established. We acknowledge that the refuge, with its federal ownership, is only one element in a huge, successful effort to protect and conserve land. We also recognize that we have a critical role to play. The patterns of land ownership and the local economy have changed markedly over the last two decades. Each of our partners has an important role to play, depending on the land and the availability of funding and other resources to protect it. Fortunately, we enjoy a strong relationship with our partners today and, whether it is the Town of Errol, a non-government organization, the states of Maine or New Hampshire, or a private land owner or timber company, each has assumed an active role in communicating its priorities and available resources. The partnership has worked very well in recent years, and we will continue to ensure that those relationships succeed for the betterment of natural resources in the Northern Forest.

Comment: One letter states that the draft plan would allow maximum hunting, fishing, trapping, and increasing visitation by all users groups, resulting in extensive resource impacts on and unregulated takes, thus undermining the goals and strategies for wildlife and habitats in the State of New Hampshire Wildlife Action Plan (NH WAP) of 2005. The author of this comment attached a letter to Governor Lynch that asked him to intervene in the CCP planning process and initiate a review of the draft CCP/EIS by state biologists most knowledgeable about, and vested in, the NH WAP, instead of relying on involvement from the state biologists who participated on the CCP core planning team.

Response: We disagree with the comment that our proposals undermine the NH WAP. We fully used those of both states in developing our proposals, and believe our proposals are fully consistent with those plans (in chapter 1, see “Conservation Plans and Initiatives Guiding the Project”). We enjoyed the full participation of the NHFG and MDIFW biologists who were appointed to our core planning team by their respective directors, in developing our draft and the final CCP/EIS. Other staff biologists in both agencies reviewed the draft before we distributed it to the public. During its development, we held briefings at both agency headquarters. During the public comment period, we received a letter from the Director of the NHFG stating, “The approach and expected outcomes outlined in the CCP are consistent with the state’s wildlife action plan.” We discuss that consistency with state regulations on hunting and fishing in chapter 2 of the final CCP/EIS, under “Actions Common to All Alternatives.” We also respond to other comments on our hunting, fishing, and trapping programs under their topic headings below. Other comments about state biologists, particularly whether they support the state WAPs, are irrelevant to the scope of the final CCP/EIS.

1.4 Statutory Authority

(Letter ID#: 37, 91, 98, 112, 118, 352, 604)

Comment: Several reviewers commented that alternative B in the draft CCP/EIS violates the Improvement Act and Service policy (602 FW 1.4A) by allowing certain uses, or by recommending that those uses be allowed. The comments specify hunting, fishing, trapping, motor boating, jet skiing, and snowmobiling as detrimental

to wildlife and undermining “wildlife and wildlife conservation must come first.” They acknowledge hunting as a designated priority use of the Refuge System, but believe that “rigorous scientific research into the status of refuge wildlife populations” must occur before we allow it.

Response: The Improvement Act establishes hunting and fishing as priority public uses on national wildlife refuges. We discuss their implementation under their section headings below. As for trapping, the final CCP/EIS discusses why we are postponing our decision on whether and how to manage furbearer species, and whether that management could include trapping, until we can conduct a further analysis and prepare a more detailed Furbearer Management Plan. Boating is currently allowed to facilitate priority wildlife-dependent public uses, and is regulated in sensitive areas of the refuge. In both the draft and the final CCP/EIS, appendix B, “Findings of Appropriateness and Compatibility Determinations,” includes our determination on snowmobiling, which includes stipulations to ensure its compliance with the Improvement Act and Service policy. We remind the Animal Protection Institute and other interested parties that each compatibility determination includes a discussion of potential or known impacts, and lists stipulations that we will implement to ensure that all the activities we allow on the refuge are compatible with the mission of the Refuge System and the purposes for which the refuge was established.

Comment: Several reviewers supported our determination that pursuing National Wilderness Preservation System (NWPS) designation for refuge lands is unwarranted. However, others argued that our analysis in that determination was inadequate, and the “decision to use size as a reason not to further analyze the wilderness potential is...misguided.”

Response: Both the draft and the final CCP/EIS include appendix D, “Wilderness Review.” That appendix includes our recommendation not to pursue NWPS status for refuge lands we own in fee title. We recognize that some wilderness units in the NWPS are smaller than 5,000 acres, and that size alone is not a reason to disqualify land from consideration. However, we also considered other criteria, including the ability to manage as wilderness and still meet refuge purposes. We stand by our conclusion in the final CCP/EIS appendix D, “Wilderness Review.”

Comment: The Humane Society of the United States (HSUS) commented that the draft CCP/EIS violates NEPA, because the Service has not completed an EIS on its national wildlife refuge hunting program.

Response: We do not believe there is a need to do a national EIS for hunting. The House Report (HR 1420) that accompanied the Improvement Act states that, by providing a statutory compatibility standard and requiring the Service to develop and implement a process for compatibility determinations, the Act ensures our management of the Refuge System and individual refuges to fulfill their missions for the long-term benefit of the American people. Service policy (603 FW 2) delegates authority to the refuge manager to determine the compatibility of priority public uses, such as hunting.

Comment: The HSUS also states that the draft CCP/EIS violates section 7 of the Endangered Species Act (ESA), which requires each federal agency to ensure that its actions do not jeopardize the continued existence of any endangered species. The comments mention the intra-agency consultation process required to fulfill section 7 of the ESA.

Response: We are well aware of our responsibilities to comply with the ESA and complete its section 7 consultation process. As part of that process, we submitted the final CCP/EIS and an intra-Service section 7 consultation form to our Ecological Services Field Office in Old Town, Maine. The results of that consultation are incorporated in the final CCP/EIS as appendix P.

Comment: Florida Power and Light—Energy (FPL Energy) questioned whether the Service had misused monies from the Migratory Bird Conservation Fund to acquire refuge lands. In particular, they are concerned that we acquired land without the approval of the governor or appropriate agencies of the state affected. We are required to seek approval from state agencies when we wish to acquire land where a power site is located, such as the Errol Hydro Project licensed by FERC.

Response: We are not aware of any violation of the Migratory Bird Conservation Fund Act in refuge land acquisition. Further, we submit that this comment is outside the scope and purpose of the CCP and final EIS, which provide management direction over the next 15 years for existing and proposed refuge lands. Those final documents are not intended to provide a detailed history of every tract acquisition. We ask that FPL Energy direct its questions about specific tracts to the Northeast Region Chief, Division of Realty, at 300 Westgate Center Drive, Hadley, MA 01035.

Comment: The Maine Land Use Regulation Commission states, “Each of the goals and implementation measures provided in the draft CCP, as part of all three alternatives, appear to be consistent with the Maine Land Use Regulation Commission Comprehensive Land Use Plan. In fact, many of them are exemplary of the Commission’s goals, policies, Vision, and overall purpose.”

Response: We are very pleased to hear that our proposed alternatives are in line with the state’s comprehensive land use plan. Complementing the conservation goals of the state is very important to us.

1.5 Jurisdiction

(Letter ID#: 3, 101, 107, 108, 111, 112, 118, 136, 139, 152, 196, 198, 200, 310, 324)

Comment: The comments we received about jurisdiction focused on two main issues: questions about the ownership of lands above the original Great Ponds and the approved FERC boundary (open water); and, water-level management within the FERC boundary.

The comments on issues of land ownership and jurisdiction involved who controls the “open water,” who manages the open water of the lake, and who is responsible for managing access and public use throughout the lake.

Response: Regarding the control of open water, as we state in our original EA (1991), the states of Maine and New Hampshire have the responsibility for navigable waters, and state regulations apply. In certain circumstances, the Service can control temporarily the use of those navigable waters within the refuge when that use affects the refuge purpose. One example is our closing temporarily the waters adjacent to a loon or eagle nest to prevent the disturbance of nesting birds. In all such cases, the Service acts jointly with the respective state, and enforces jointly with that state.

The United States, in establishing the refuge and acquiring shorefront properties, acquired a fee interest in the land between the original Great Ponds and the current shoreline, subject to the outstanding property rights of other parties, primarily, flowage rights owned by the FERC licensee. That brought to the forefront several questions about jurisdiction as it relates to the license. Over the last few years the Service and FPL Energy, the current licensee of the Errol project, have been working to clarify their respective rights on the lands in which both have some rights. Currently, we do not agree on the extent of the rights FPL Energy owns. We will continue to clarify those rights with respect to the areas between the original Great Ponds and the current shoreline. We based the management goals and objectives in our final CCP/EIS on our understanding of the rights of the United States. We might vary the level at which we implement those goals and objectives if that understanding changes.

When we discuss public use and access in this final CCP/EIS, we are referring to public use on refuge lands. We consider their management to lie within the authority of the Service and the refuge. It is our understanding that we acquired the necessary rights to support the exercise of that authority with the fee interest in the shorefront property.

Comment: Comments regarding water level management highlighted concerns that the proposals in the final CCP/EIS represented an over-assertion of refuge and Service authority within the FERC license area that would have a significant impact on users downstream.

Response: We consider that concern a misinterpretation of what we propose in the draft and the final CCP/EIS. We acknowledge that FPL Energy owns flowage rights permitting it to flow the lands around the original Great

Ponds at least up to elevation 1,247 feet USGS Datum. We also recognize that the water level management of Umbagog Lake is FPL Energy's responsibility under its FERC license, and that there is a process in place to provide input on that water level management under the current FERC license. We clearly state in chapter 2 of the final CCP/EIS, under "Coordinating Umbagog Lake Water Level Management" that, under all the alternatives, we will continue to work cooperatively with the licensee under article 27 of the current license to influence water level management. In each alternative, we will work to accomplish its water level management objective through the FERC process. We also state that, in proposing something that lies beyond the terms of the current FERC license, we would be recommending it, but the licensee would be implementing it voluntarily. We are not asserting our authority over water levels beyond that which already exists. See also our response in this document under the sections "Dam Operations" and "Coordination and Consultation."

Comment: Several comments supported the management, research, and land conservation proposals in the draft CCP/EIS. Some cited consistency with existing plans within the local jurisdiction, and others supported the refuge ability to monitor and study the effects of management actions within one FERC project, and how it can be used to address issues in other FERC projects.

Response: We thank the reviewers for their support, and agree with the benefits this proposal provides.

1.5.a Dam Operations

Comment: Several reviewers commented on the role of Umbagog Lake in flood control and the maintenance of downstream flows. They were concerned about language in the draft CCP/EIS discussing our desire to modify lake levels based on the philosophy of each alternative: for example, in chapter 2 under "Actions Common to All Alternatives," "Coordinating Umbagog Lake Water Level Management"; in alternative B, goal 1, objective 1.1 and its strategies; in chapter 3 under "Refuge Natural Resources," Hydrology"; and, in chapter 4, under "Effects on Hydrology and Water Quality."

Response: We recognize the potential impacts on users downstream and people living downstream of the Errol Dam. We recognize that provisions in the FERC license allow for annual meetings of state wildlife management agencies, the Service, Audubon Society of New Hampshire (represented by the Loon Preservation Committee), and the licensee to determine a scheme of water level management during the wildlife nesting season. The wildlife nesting season is now the only time that outside groups have any influence over lake levels. That meeting and the ensuing scheme of lake level management take into consideration any effects on flood control and minimum flows.

The final CCP/EIS includes the same sections of the draft document we note above. In them, when we discuss the possibility of modifying lake level management outside the wildlife nesting season, we clearly state that our ability to achieve it would depend on our ability to work with the holder of the FERC license for the Errol Project (currently FPL Energy). The limits of the FERC license would constrain any modification of water level management. Therefore, we anticipate no modification of minimum flows that would affect pollutant discharge levels for downstream users.

Comment: Other commenters felt that the dam should be managed for a uniform lake level.

Response: The life cycles and survival strategies of many wetland and riparian plants, submerged aquatic vegetation, shrubs, and trees are linked to the seasonal fluctuation of water levels. Holding water levels steady can impair the ability of those plants to germinate, survive, reproduce, and ultimately, provide food sources for wildlife. For example, wild rice and beggar ticks grow in areas of shallow water and in areas where receding water levels leave "moist soil." Those species provide a source of seeds necessary for migrating waterfowl. Maintaining a steady water level could result in a decrease in the diversity of wetland plants and the invertebrates that also occupy those shoreline zones. Different bird species also require different water depths for foraging. Seasonal declines in water level provide opportunities for many of those species to find depths appropriate for foraging, particularly during migration.

1.6 Implementation

(Letter ID#: 134, 497, 513, 517)

Comment: A few comments stated that we should use funding to do a better job of implementing alternative A. Some specifically wanted increased funding for education and recreation programming before, or in place of, expanding the refuge. Some also stated that we were not cleaning up properties fast enough or thoroughly enough.

Response: We developed a CCP that clearly states the desired future condition of the refuge and serves as a master strategic plan for all aspects of refuge operations. The following statement can be found on the inside front cover of the final CCP/EIS: “Comprehensive Conservation Plans provide long-term guidance for management decisions and set forth goals, objectives, and strategies needed to accomplish refuge purposes and identify the Service’s best estimate of future needs.”

One sentiment underlying the comments is that we should do better with what we have before proposing or moving forward with expanding the refuge. However, although we propose expanding the refuge and enhancing education programming together as part of alternative B, the funding sources for those programs are not the same, and we cannot use them interchangeably. Our land protection plan does not take funding away from our other planned improvements, many of which the comments mentioned. We propose in alternative B what we believe best meets the mission of the refuge under its present and future conditions. Expanding the refuge land base is one important aspect of that plan to meet wildlife needs, based on changing patterns of land ownership and habitat. Please refer also to our responses in this document under “Land Acquisition” and “Buildings and Facilities.”

The CCP clearly states our desire to “enhance our existing priority public use opportunities.” Please refer also to chapter 2 in the final CCP/EIS, alternative B, goal 4, for the specific strategies we recommend to improve our education and recreation programs. See also in chapter 2, under “Actions Common to All Alternatives,” the section “Removing Unnecessary Structures and Site Restoration.” We believe that the goals, objectives, and strategies in alternative B of the final CCP/EIS better match the reviewers’ desire to improve education and recreation programs than do those in alternative A (the “current management” alternative). In other words, in alternative B we are proposing to work toward the reviewers’ desired goals of improving the education and recreation programs and clearing or cleaning up properties we recently purchased.

Once our regional director selects an alternative and approves it in a record of decision, we can start implementing the strategies in that alternative. However, there is one exception. Our land acquisition program is subject to separate funding appropriations and the availability of willing sellers. We believe that the future condition the final CCP/EIS describes, with the exception of the proposed refuge expansion, is similar to the commenters’ expressed wishes. The final approval of a CCP will allow us to work toward our common goals.

1.7 Agency (General comments, including trust and integrity)

(Letter ID#: 2, 6, 20, 21, 223, 24, 50, 51, 56, 62, 68, 69, 70, 73, 75, 81, 85, 88, 93, 98, 107, 108, 111, 125, 135, 136, 138, 148, 199, 259, 315, 317, 352, 385, 386, 432, 437, 476, 479, 513, 592, 925)

Comment: Some comments objected to hunting on any refuge. Others commented that the Service is compromising the biological and ecological integrity of refuges by allowing hunting. Those comments refer to the definition of the word “refuge” and its apparent conflict with the word “hunting.”

Response: Please refer to the section “Hunting” in this document, and to the compatibility determination on public hunting in the final CCP/EIS, appendix C, “Findings of Appropriateness and Compatibility Determinations,” for an explanation of the laws, directives, and policies that direct our management of hunting on national wildlife refuges.

Comment: We received comments about trust of the government, the Service, the refuge, and refuge staff. Some were positive, some negative.

Response: We appreciate the support of those support the refuge, the refuge staff, and refuge planning. However, we recognize a certain amount of distrust of the government, the Service, or even individual refuge staff. The National Environmental Policy Act of 1964 (NEPA) was established, in part, to provide for public engagement in and comment on federal actions. NEPA and the Improvement Act have laid a framework that emphasizes a planning process with public involvement during several stages of developing a CCP.

We know that building trust in the local community requires work. We hope that, by describing our vision, goals, objectives, and strategies in the final plan, and involving the public during the planning process, we will improve that level of trust. As we implement that plan over the next 15 years, the public will see that we are accomplishing our goals and objectives, thereby realizing our vision for the refuge. That includes increasing outreach to the community, which we expect to foster improved relations and public trust in our ability to accomplish those goals without adversely affecting the community.

Comment: Several commenters suggested forming a citizens' advisory group.

Response: We recognize that definitions differ on what a citizens' advisory group should be. Some commenters are looking for better communication between the refuge and the local community. We recognize the value of interacting with members of the public whose lives and livelihoods our refuge management decisions affect. We agree that we can do a better job in that area, and will work to improve communications between the refuge and the public. In addition to improving our involvement in community and civic activities, we plan to host quarterly informal open houses in local community facilities to facilitate communication, as long as the public remains interested.

Others would like to see an advisory group that helps us make decisions about managing the refuge. As a public agency, we must listen to and respond to public comments. At times, that process is formal, as in public involvement in the CCP process; at other times it is informal, as in a conversation with a refuge staff member at any time. We value public input and, in making decisions about refuge management, take into consideration all public input.

Congress has delegated the management of the National Wildlife Refuge System to the Service, and the Service may not legally abdicate that responsibility in favor of any other entity. Accordingly, the Service welcomes public comment and viewpoints of others, but cannot delegate its decision-making responsibilities.

Forming a group like a "Friends Group" to help refuge staff conduct outreach, or advocate for and support the refuge in accomplishing refuge priorities, and/or hosting quarterly meetings open to the public to share individual concerns, opinions, information and viewpoints, is valued and we wholly support these ideas.

Comment: We received several comments about the final environmental assessment (1991 EA) establishing the refuge and its promises to continue traditional use and access.

Response: We consulted that EA, and understand the frustration those commenters voiced. Its language on that subject is often inconsistent or ambiguous. Its lack of clarity led people to form their own definitions of what, exactly, the traditional uses are.

The references to traditional uses and access can be found on the second and third pages of its summary and on pages 1, 14, 15, and 29 of its body. The early references are ambiguous, merely mentioning the terms "traditional uses" and "access." Those terms gain some clarity later in the document, when it specifically mentions some uses: timber management, wildlife-oriented public uses [observing and photographing wildlife, hunting, and fishing], shoreline access, hiking, and cross-country skiing. It further qualifies those and other uses, as in "when and where they are considered compatible with the primary purposes for which the lands were acquired, in this case to protect eagles, waterfowl, and other wildlife from increased disturbance and habitat degradation" (p. 14), or "where compatible with wildlife management goals" (p. 15).

In our final CCP/EIS, chapter 4, "Environmental Consequences," this sentence is perhaps the clearest: "Traditional access to the shoreline and wildlife-oriented public uses, such as wildlife observation and

photography, fishing, hunting, hiking, and cross-country skiing, at existing levels, would be preserved where compatible with wildlife management goals, as at most national wildlife refuges.”

The language we used to clarify the uses “compatible” is specific to refuge policies at the time that have since become law in the Improvement Act. They result in the findings of appropriateness and compatibility determinations in the CCP that specify which public uses we will allow on the refuge. Two of the purposes for a CCP (see final CCP/EIS, chapter 1, “Purpose and Need”), are to “explain clearly to state agencies, refuge neighbors, visitors, and partners the reasons for management actions”; and “ensuring that present and future public uses are compatible with the purposes of the refuge.”

We believe that our development of this final CCP/EIS conforms to the intent of NEPA and its regulations. We also believe we have provided sufficient review and analysis of the existing public uses and ample opportunity for the public to bring up additional ones. We also feel we have addressed all the uses the 1991 EA refers to as “traditional.” The public uses we found appropriate and compatible in the CCP represent the entire list of allowable uses for the foreseeable life of this plan. At their current levels, they do not materially detract from or interfere with the mission of the Refuge System or the establishing purposes of the refuge. Each compatibility determination for a particular use or activity lists the stipulations necessary to ensure its compatibility.

Comment: We received several comments opposing increased regulations imposed by the refuge.

Response: Some of those comments relate to refuge-specific regulations on hunting. Please refer to our response in this document under “Hunting.”

Comment: Others opposed increased regulations on public use with no clear explanation of them.

Response: One of the purposes of a CCP (see final CCP/EIS, chapter 1, “Purpose and Need”) is to “explain clearly to state agencies, refuge neighbors, visitors, and partners the reasons for management actions.” We believe we have accomplished that in the final CCP/EIS. Clear explanations of the regulations for all public uses allowed can be found both in the main document and in the relevant compatibility determinations.

Comment: One commenter advocated rebuilding currently strained conservation partnerships, and planning based on sound science.

Response: We agree that good science, combined with a spirit of collaborative partnership, will enhance local, regional and national conservation and improve the management of the refuge. In fact, sound science is a Service policy.

We participate in many conservation partnerships that are strong and are working well. We also remain hopeful that we can rebuild any partnerships that have lapsed or weakened in the past. We look forward to improving those relationships in the future.

Comment: People also were frustrated that the government will do what it wants and not listen to the public.

Response: We have listened actively throughout this planning process, and will continue to do so even after we publish the final plan. We have considered many requests and, although we cannot satisfy every one of them, we have done our best to accommodate them when we could. We have now added compatibility determinations for dog-sledding, certain types of recreational berry-picking, horseback riding, and bicycling. We want the public to feel that their voices have been heard in the modifications we have made between the draft and the final CCP/EIS. We recognize that better outreach throughout the planning process might have alleviated some of the frustration voiced in the public comment period, and are committed to providing additional outreach in planning refuge activities in the future.

1.8 Coordination and Consultation

(Letter ID#: 4, 7, 11, 61, 99, 100, 107, 111, 112, 118, 133, 135, 136, 149, 151, 199, 200, 257, 292, 351, 451)

Comment: Several reviewers recommended that we include elected local, county, and state officials in both Maine and New Hampshire on any official or advisory groups or committees. One reviewer cited a particular need to work with each state governor's office, departments of fish and game, state tourism and parks and recreation.

Response: We believe we have done a good job of including the MDIFW, the NHFG, and NH State Parks throughout the planning process. On the other hand, we recognize that we have not done the same thorough job in informing the governor's offices and local and county officials during that process. The final CCP/EIS, chapter 5, "Consultation and Coordination with Others," mentions our numerous outreach efforts related specifically to plan development. Local town and county elected officials, our congressional representatives, and the respective governor's offices are on our project mailing list, and received every public notification we sent.

Comment: Several organizations, in addition to their other shared comments, offered their particular expertise in assisting refuge staff in implementing the final CCP: for example, the New Hampshire Community College, the Forest Society, Northern Forest Canoe Trail (NFCT), Rangeley Lakes Heritage Trust (RLHT), and NH Lakes Association. The New Hampshire Community College "would be pleased to work with the refuge management as an educational partner...in educating the next generation about our natural resources." The Forest Society "looks forward to working with the Service and refuge staff in advancing the conservation goals identified in Alternative B." The NFCT offered to lend assistance in evaluating camping sites or otherwise supporting activities that facilitate the use of canoes and kayaks along the trail. The RLHT would like to continue their strong partnership with the refuge in identifying conservation lands of high resource value in need of protection by the Service and others. NH Lakes encourages us to use their organization and other non-profits dedicated to lake protection as consultants on the Umbagog Lake Working Group. Many others suggested that local and county government representatives, local residents, adjacent landowners, or members of user groups, in particular, should be a part of the working group. One commenter wondered how the working group could resolve user conflicts on the lake without having members from among those groups. The NH Wildlife Federation wants the working group to include hunters and hunter advocacy groups. Another commenter felt that including local and county officials would meet two important goals: (1) create a consistent set of law enforcement objectives and protocols, and (2) develop a comprehensive watershed plan to coordinate resource planning and management.

Response: We appreciate the offers of assistance and collaboration, and look forward to continuing to work with our existing partners and develop new ones in implementing the CCP. Please contact refuge headquarters to discuss projects that you believe are of mutual benefit and interest.

Regarding participation on the Umbagog Lake Working Group, we propose in chapter 2 of the final CCP/EIS, under "Actions Common to All Alternatives," that the working group membership consist of federal and state agencies with management authority on the lake. As a participant in that working group, we would encourage others to share their information, ideas, or suggestions. We would encourage a regular forum in which the group would solicit others' input. In response to the reviewer who believes the group should establish consistent law enforcement objectives and protocols and develop a comprehensive watershed plan, we agree that those are desirable goals, but it is also important to recognize the group would not be a statutory or regulatory body, although it would be able to send its recommendations to those federal and state authorities who do set regulations. In that capacity, the goals suggested seem reasonable for the working group to consider.

Comment: FPL Energy highlights in their comments that the draft CCP/EIS in several places fails to identify them as an entity with which we would coordinate lake management activities, particularly those that relate to protecting and monitoring bald eagle, osprey, and loon nests. They refer to draft CCP/EIS chapter 2, pages 2-6, 2-27, and 2-28 as examples.

Response: We correct that omission in the final CCP/EIS, chapter 2, objectives 1.1 and 1.6 under alternatives A, B, and C. We discuss other aspects of the coordination, authority, and jurisdiction under the FERC license agreement under the section "Dam Operations."

Comment: One reviewer wrote a concern about the failures in collaboration on loon population research among the refuge, the LPC, and other former partners, many of whom were working to conserve loons before we

established the refuge. Their early work was instrumental in identifying the significance of Umbagog Lake for loons. In that commenter's view, the pursuit of good science has been sacrificed, the partnership has fallen apart, and we have lost valuable time in assessing the reasons for the decline of adult loons on the lake, all to the detriment of the loon population. The commenter also states that "LPC would welcome the opportunity, as a stakeholder in this group, to have input into specific territory by territory management being considered by the refuge, the FERC licensee, and other government agencies."

Response: We regret we must acknowledge that our relationship with LPC has become strained. We sincerely appreciate the strong attachments that several people associated with LPC have to the loon project on Umbagog Lake. We also recognize the huge investment in time and effort LPC has made in the conservation of common loons and the long-term loon population data set they have established. We are interested in mending that relationship and broadening our partnerships with other loon scientists and biologists of state and federal agencies.

We respectfully disagree with the comment that good science has been sacrificed in recent years. The designs of all our recent research projects underwent peer review, and that review will continue as they progress. The review and scrutiny of the research and monitoring being conducted is to everyone's benefit, especially considering the resources being studied. Peer-reviewed scientific study that results in land managers, such as refuge staff, making more informed management decisions should be everyone's goal.

1.9 Document (Clarity, Technical and Editorial)

(Letter ID#: 48, 100, 138, 352)

Comment: New Hampshire Audubon thoroughly reviewed the draft CCP/EIS, and noted several technical errors or made recommendations related to our descriptions of habitat or wildlife. Some of those recommendations follow.

- Chapter 1, in the section "Conservation Plans and Initiatives Guiding Project," should include objectives for Bird Conservation Region 14.
- Chapter 1, in the section "Refuge Goals," goal 6, should acknowledge and anticipate the likelihood that increasing demands for renewable energy will have impacts on the Northern Forest.
- Chapter 1, in the section "Refuge Goals," goal 7, should acknowledge the proximity of the Bartlett and Hubbard Brook U.S. Forest Service Experimental Forests and the importance of coordination.
- Chapter 2, alternative B, goal 1, objective 1.6, should include the American three-toed woodpecker.
- Chapter 2, alternative B, goal 1, objectives 1.5 and 1.6, should clarify the management authority of open water and adopt a mussel species as an additional focal species.
- Chapter 2, alternative B, goal 3, objective 3.1, should add "standing dead wood" in various places where it mentions live cavity trees and coarse woody debris, and include a strategy to establish reserves in each forest type that will not be subject to active forest management.
- Chapter 2, alternative B, goal 3, objective 3.1, should clarify that outbreaks of spruce-budworm and bark beetle regenerate spruce and fir forests, but do not convert them to other forest types.

Response: We met with a representative of New Hampshire Audubon to go over the numerous technical comments they provided. We discussed the specific changes they recommended, virtually all of which we incorporated into the final CCP/EIS. None of those changes warranted additional analyses in a new draft.

Comment: We received many comments, in writing and at our public hearing, of concerns or confusion about restrictions on berry picking. One reviewer specifically commented on that compatibility determination and its stipulations, and referred to it as "bureaucratic overkill."

Response: We revised our compatibility determination for berry picking (see in appendix C “Recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms, and antler sheds”). Although we recognize that some people will find any restrictions on berry picking unacceptable, we believe our revised compatibility determination is clearer and more reasonable (see also our response in this document under 15.6c, “Berry Harvesting”).

Comment: One reviewer was concerned that the draft CCP/EIS lacks a map or discussion of plans for maintaining roads and trails on the refuge or those on expansion lands, and that the language in the plan was inconsistent about removing roads and culverts and putting roads to bed, while the Fire Protection Plan calls for restoring roads and increasing the carrying capacity of bridges to support fire trucks and safety vehicles.

Response: In the discussion of alternative B in chapter 2 of the final CCP/EIS, we provide two new maps. Maps 2–8 and 2–9 depict the roads and trails we would keep open for activities on refuge lands and proposed expansion lands. We will put all of the roads and trails we propose for public use on the refuge into the Service Asset Maintenance Management System (SAMMS) database as assets for scheduled maintenance.

Comment: One commenter feels that the tragic flaw in the draft CCP/EIS is its economic analysis and faulty discussion of the benefits and adverse impacts of the proposed alternatives. In that commenter’s opinion, once we have corrected that information, it will show that alternative A has a higher economic benefit than has alternative B. The commenter believes the problem with the analysis is so great that either we were incompetent or we deliberately distorted information, which could be construed as fraud.

Response: That commenter acknowledges that, to clarify his concerns, we facilitated his discussing those topics with us and the U.S. Geological Service economist we asked to do our analysis. That economist, well versed in conducting economic assessments for federal land management agencies, used the IMPLAN model, which the FS uses in all their forest plan analyses, as well as Service-funded research publications on the economic impacts of hunting, fishing, and other wildlife-dependent activities.

In that discussion, the commenter voiced two major areas of concern. The first was that our current estimates of visitation were inaccurate, and underestimated current visitor use by not including wildlife viewing by motorists, dog sledding, ATV use, horseback riding, mountain biking, and other uses. We explained that we had included wildlife viewing motorists, and accounted for a majority of the visits in both the draft and the final CCP/EIS, appendix G, “Economic Analysis,” table G–6, under “wildlife viewing: nature trails and other wildlife observation.” We had not officially opened, through refuge appropriateness or compatibility determinations, the other activities the commenter had noted and, therefore, would not have included them in the visitor estimates.

We listened to public comments on access and recreation, and modified our proposal to take into account many of those uses. As a result of public input, we have proposed opening the refuge to the following additional uses with stipulations to ensure their compatibility: horseback riding, bicycle riding, dog sledding, and the recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds (please refer to chapter 2, alternative B, goal 4, and appendix C, “Compatibility Determinations”). However, we do not have enough information on those uses to estimate the current or expected visits for them. If we modified the analysis in alternative A to account for them, they would also be included in alternatives B and C, and would not create a higher economic benefit for alternative A.

The second concern was that alternatives B and C misrepresented the increased visitation. For each activity, the economic analysis in appendix G of the final CCP/EIS clearly states the level of visitation that is a transfer of visitors to refuge land from other land, which does not represent a new increase in visitation or economic activity. However, the proposed acquisition of land in alternative B will keep access on those lands open to the public. That visitor access is not guaranteed under alternative A. The commenter acknowledged that the economic report (appendix G) made that clear, but suggested making sure we clarify it in the Executive Summary and final CCP/EIS chapter 4, “Environmental Consequences.” We have done so in appendix G and chapter 4 by adding footnotes to the corresponding tables.

Comment: We heard from many people who criticized the draft CCP/EIS for its size, and how very difficult it was to give a concise comment or opinion on the hundreds of pages of detailed information.

Response: We appreciate that criticism. The size of the draft when we had finally assembled it also surprised us. The complexity of our proposed action, fully analyzing three alternatives, and sharing much of our supporting documentation and analyses in appendixes, increased its bulk. However, our experience in developing other final CCPs has shown that they become a valuable resource continually used by refuge staff and shared with others. We offered many times during the public comment period to explain its contents so that reviewers could direct their attention to particular areas of interest. We also provided an overview of the contents of each chapter in our presentation at the two information sessions in Errol. We realize that not everyone could attend, but we did our best in encouraging people to contact us if they had questions and including contact information in all of our outreach.

2.0 Purpose and Need

(Letter ID#: 112)

Comment: One commenter was concerned that the draft CCP/EIS, in chapter 1, under “Refuge Establishment History” and in chapter 3, under “Refuge Administration...Establishment,” portrays only the federal perspective, and does not “reflect the very important basis for the creation of the refuge...,” which was about partnerships and a mosaic of ownerships that met varying conservation objectives. In that commenter’s recollection, those partners also wanted the refuge established for public recreation and sustainable forestry. The commenter wants the fact acknowledged that many partners with varying conservation objectives, including recreation and sustainable forestry, supported establishing refuge. In addition, the commenter also noted that map 1–2 in chapter 1 of the draft does not recognize the State of New Hampshire conservation easement within the refuge boundary.

Response: The same reviewer provided the comment under “Relationship to Other Planning Processes,” that our land protection implies that federal government controls on land use are superior and preferable to local and state government controls. We are interpreting those comments similarly. Basically, we believe this reviewer is concerned that we have not duly acknowledged or appreciated the many diverse partners working to successfully conserve land in the refuge area. Our response is similar to our response to the other comment: that is, we never intended to imply that federal ownership is always the best or highest priority ownership. We recognize that the refuge, with its ownership of federal land, is only one partner in a huge, successful land protection and conservation partnership in the Northern Forest involving state, private, local, and non-government partners. Fortunately, the relationship among them today is strong; each has assumed an active role in communicating priorities and available resources. We will continue to work toward ensuring that those relationships succeed for the betterment of natural resources in the Northern Forest.

We describe the partnership that was instrumental in establishing the refuge in chapter 3. Please see our revision in chapter 3 of the final CCP/EIS, under “The Refuge and its Resources...Refuge Administration...Establishment.” We also highlight the partnership in chapter 1, issue #2, and in chapter 2, under “Actions Common to All Alternatives...Land Conservation.” In chapter 1, map 1–2 codes the State of New Hampshire easement lands along the shoreline of Umbagog Lake as “conservation lands.”

Comment: One reviewer suggested that the goals and purposes in the draft CCP/EIS differ from those authorized in establishing the refuge. According to this reviewer, the most significant difference was to move away from “protecting the habitat adjacent to the waters of Umbagog Lake and the Magalloway and Androscoggin rivers, to asserting control of the waters themselves that were specifically excluded in its formation.” The reviewer continues, “This change is inconsistent with law, and at a minimum, requires a full and thorough discussion and analysis in the EIS.”

Response: The refuge was established for several purposes, including the conservation of wetlands, migratory birds and other fish and wildlife resources. It is true that the 1991 EA emphasizes the protection of Umbagog Lake and its watershed. The lake was clearly the focal point of conservation at that time. However, since 1991, we

have learned a great deal about landscape-level conservation in the Northern Forest and the need for large, core areas of forest connected by forested corridors to sustain the movement of aquatic and terrestrial wildlife. The assertion that the Service is trying to expand the refuge purpose to assert control of the waters itself is simply untrue. For additional clarification, please read our response in this document under “Jurisdiction.”

2.1 Scope

No specific comments received

2.2. Proposed Action

No specific comments received

2.3 Refuge Vision and Goals

(Letter ID#: 20, 100, 108, 112, 117, 118, 135, 136, 139, 240, 352, 432, 683, 692, 106, 713, 809, 818, 819, 827, 915, 927)

Comment: Many people commented on the proposed name change to “Umbagog National Wildlife Refuge.” Some supported the name change for the reasons we set forth in chapter 2 of the draft CCP/EIS in “Actions Common to All Alternatives.” Others felt the name change was unwarranted, would result in unnecessary, costly changes in refuge signs and brochures, or would detract from the focus on Umbagog Lake.

Response: We stand by our reasoning for the name change under “Actions Common to All Alternatives” in alternatives B and C in both the draft and the final CCP/EIS. Also, we do not agree that the change would incur huge costs. We would need to replace three refuge entrance signs, make use of the brochures and literature we have, and incur the cost of the name-change when we use up those reserves and reprint them.

Comment: One reviewer commented that we made unrealistic assumptions about the timelines for completing future projects. That comment lists more than 20 studies, assessments, or projects to be completed within 1 year of CCP approval.

Response: We agree that the list of studies, assessments, and projects in the draft and the final CCP/EIS is ambitious. However, it is important to recognize that this is a 15-year plan, and the descriptions of some of our strategies include the caveat “as funding and staffing allow.” We also list the time frames for starting projects to give a sense of their priority. Some of them are ongoing, established activities, or require only one or two days of input. Some require only a short time: for example, the annual meeting with the FERC licensee.

We adjusted some timeframes as we reconsidered the projects in the final CCP/EIS. We ask our readers to note that partners lead some of the listed projects, such as the inventory of active bald eagle nests. After reviewing our recommendations for the schedule of projects, we believe no change is warranted.

We also would like to reiterate the official Service disclaimer on the inside front cover of the final CCP/EIS: “[This CCP provides] the Service’s best estimate of future needs” and “details program planning levels that are sometimes substantially above current budget allocations and, as such, are primarily for Service strategic planning and program prioritization purposes. These plans do not constitute a commitment for staffing increases, operational and maintenance increases, or funding for future land acquisition.”

Comment: We heard from people who suggested modifying the vision and goals to advocate for a refuge that was a true sanctuary for the preservation of wildlife, to protect lands in a “pristine” condition, and minimize human impacts. One person said the refuge should be “preserved as a natural ecological treasure” so that “grandchildren can enjoy [treasures] in the same way we do.”

Response: Writing a vision statement can be very challenging. Service planning policy (602 FW 1.6) defines a vision statement as “A concise statement of what the planning unit should be, or what we hope to do, based primarily upon the Refuge System mission and specific refuge purposes, and other mandates. We will tie the vision statement for the refuge to the mission of the Refuge System; the purposes of the refuge; the maintenance or restoration of the ecological integrity of each refuge and the Refuge System; and other mandates.”

We believe our vision statement captures the intent of the Refuge System mission, refuge purposes, and desired future condition. It emphasizes wildlife and habitat conservation, but also recognizes the importance of humans in the landscape, whether recreating, conducting research, living, or working.

Regarding our goal statements, we also believe they support the Refuge System mission, Service mandates, policies and conservation plans. We mention under “Goals” in chapter 1 of both the draft and the final CCP/EIS that “The biological goals take precedence; but otherwise, we do not present them in any particular order.” We have three biological goals, two public use goals, and one conservation partnership goal. In our opinion, that is a reasonable balance of emphasis on natural resources and human activities.

2.4 Issues Identified During Public Scoping Process

No specific comments received

2.5 Issues and Concerns Outside the Scope

(Letter ID#: 92, 139, 310)

Comment: Several commenters, after lengthy descriptions of how the Upper Androscoggin River storage functions as a system, with Umbagog Lake serving a key role, and all the benefits that provides downstream, express concern that our proposals to change the water levels in the lake could have significant impacts on the downstream uses and biology of the refuge, and that the draft CCP/EIS does not adequately address them.

Response: Our response under “Dam Operations” in this document emphasizes that we recognize the provisions in the FERC license, and that the limits of that license would constrain any modifications of water-level management. In other words, any changes in water-level management would be in collaboration with the FERC licensee of the Errol project, an entity that, presumably, would be cautious of water-level management that would significantly impact beneficial uses downstream.

2.6 Monitoring and Evaluation

(Letter ID#: 91, 100, 112)

Comment: Some commenters expressed concern about time lines they perceive as unrealistic for the completion of refuge projects, including monitoring and research.

Response: We agree that the time lines for some of our proposed monitoring strategies might be ambitious. In many cases, we are proposing to begin our activities within those time lines, not necessarily to complete them. We also envision using a number of different approaches to accomplish our goals, including cooperative agreements with state agencies and other organizations and contracting some work to academic institutions or others (see also our response under “Refuge Vision and Goals” in this document).

Comment: The commenter supported the proposed cooperation between the refuge and the New Hampshire Natural Heritage Inventory program, but suggested that we conduct rare plant inventories before we conduct any timber harvest or other management activities that might affect communities of unique or rare plants. The commenter also suggested that we conduct plant inventories prior to the 7-year period proposed in the draft CCP/EIS.

Response: We agree with the commenter’s emphasis on the importance of inventorying and monitoring. One prominent strategy we list under most of the habitat types we describe in our discussion of alternative B in chapter 2 of the final CCP/EIS is to implement a monitoring plan to assess the baseline community composition of both animals and plants. We have already inventoried the vegetation of two of our major wetland complexes (Leonard Marsh and Harper’s Meadow), and have established permanent plots that we will continue to monitor.

In terms of timber management, chapter 2, alternative B, goal 3, “Manage upland forest habitats...General Strategies,” proposes that we “conduct resource surveys prior to forest management to ensure that resources of concern are identified and impacts minimized or eliminated.” We have already conducted or are conducting

baseline avian and amphibian surveys in many of our forested habitats. As we indicate above, we intend to carry out comprehensive pre-management surveys prior to all our proposed timber management, to identify any rare plant communities or other resources of concern in the area of, or likely to be affected by, our proposed activity (refer to final CCP/EIS appendix C, “Compatibility Determination for Forest Management”). We will modify those management actions to minimize their impacts. We will prioritize surveys and inventories so that the habitats targeted for early management activity will be inventoried first. Although we will strive to inventory all our habitats as soon as is feasible, we feel that a 7-year time frame is a reasonable one for accomplishing this task.

Comment: One commenter suggested monitoring suites of bird species rather than focal species.

Response: We view our focal species as representing the suite of species with similar habitat requirements (refer to chapter 2, alternative B, “Introduction,” in the final CCP/EIS). However, our ongoing annual breeding bird surveys monitor all bird species detected from point count stations along survey routes, not just our focal species. Breeding bird surveys have been carried out continuously since 1999, and should make it possible for us to carry out the types of species richness analyses the commenter suggests.

Comment: One commenter advocated that we “put wildlife first,” on the refuge, and incorporate an inventory and habitat management plan for all species, including lynx, into the final CCP/EIS. That commenter emphasized the importance of monitoring the impacts of public use on wildlife, particularly the impacts of snowmobile activity.

Response: We recognize the importance of inventorying and monitoring species and habitats to successfully accomplish our mission (see response above). We also recognize the importance of monitoring the impacts of public use and our management activities on wildlife and habitat. For those reasons, we list surveying and monitoring as strategies under most of the habitat types in the discussion of alternative B in chapter 2 of the final CCP/EIS.

We have already carried out surveys on a wide variety of natural resources and habitat types, including vernal pools, various groups of avian and mammal species (including lynx), aquatic invertebrates, and a number of wetland and upland forest vegetation communities. We also started surveys or research on summer visitor use and the impacts of disturbance on wildlife. For a description of our approach to inventorying and monitoring on the refuge, refer to “Implementing and Prioritizing a Biological Monitoring and Inventory Program” in chapter 2 of the final CCP/EIS. We will incorporate detailed habitat management and inventorying and monitoring plans into two step-down plans: a Habitat Management Plan (HMP) and an Inventory and Monitoring Plan (IMP). Developing them will be a high priority after we complete the final CCP (see final CCP/EIS chapter 2, under “Actions Common to All of the Alternatives...Developing Refuge Step-down Plans”). Those plans will address the specifics of managing and monitoring all refuge natural resources, including rare, threatened, or species of concern, such as Canada lynx.

Although we have not inventoried resources with the potential to be impacted by snowmobile trails, the compatibility determination for snowmobiling (see appendix C) calls for such an inventory, in the section “Stipulations Necessary to Ensure Compatibility.” Other stipulations include evaluating and potentially rerouting trails likely to negatively affect refuge resources (see also our response in this document under “Snowmobiling”).

2.7 Cumulative Effects

(Letter ID#: 37, 98)

Comment: We received one comment that the CCP did not fully analyze the cumulative impact of all proposed activities affecting the environment and wildlife inhabiting the refuge.

Response: We note the comment, but contend that the analysis of cumulative impacts was sufficient for this final CCP/EIS.

Comment: One commenter stated that the CCP must look at “the cumulative impacts of hunting on wildlife, migratory birds, and non-hunting refuge visitors at refuges throughout the Refuge System before permitting hunting to continue via CCP”

Response: We note the comment, but contend that the analyses of cumulative impacts we completed, not only for this final CCP/EIS but also for the 2007 EA of public hunting, were sufficient.

3.0 Alternatives

(Letter ID#: 16, 319, 597, 600)

Comment: A few commenters suggested that we take certain actions from one alternative in the draft CCP/EIS and combine them with those of another. For example, one reviewer stated, “Although I favor the habitat management policy of alternative B, I prefer the larger boundary configuration of Alternative C.” Some people stated that many of the objectives we identify under alternatives B and C could be achieved on existing refuge lands without the extensive building of infrastructure.

Response: We have shared the suggested combinations with our regional director, who also has reviewed this document. He will decide whether to adopt one of the alternatives in the final CCP/EIS in its entirety or select specific actions from among the alternatives for the ROD.

3.1 Alternative A: Current Management

(Letter ID#: 17, 18, 20, 22, 23, 25, 30, 35, 50, 51, 56, 64, 65, 71, 72, 73, 76, 77, 82, 84, 86, 93, 97, 102, 105, 107, 110, 111, 125, 133, 135, 137, 153, 199, 307, 312, 315, 360, 363, 364, 370, 375, 386, 394, 470, 473, 476, 479, 483, 492, 497, 507, 513, 517)

Comment: We received comments both for and against alternative A, for a broad range of reasons. Some generally supported it, while others cited specific reasons against it: for example, it adds too many regulations, denies public access, or we should manage our current land base more effectively before we expand it.

Response: We will start implementing the strategies in the final CCP/EIS after it is approved. That will happen independently of the expansion of the refuge, which depends on the availability of funding and willing sellers. In other words, we believe that the future condition we describe in alternative B, our preferred alternative (with the exception of the refuge expansion), is similar to the future condition the commenters desire. The approval of a final CCP allows us to work toward those goals. For comments relating to funding sources, the better management of the current refuge prior to expansion, and further discussion of those issues, please refer to our response in the “Implementation” section, below.

We acknowledge that the public had access to much of the land now under refuge ownership long before the refuge was established. We appreciate the tradition of outdoor recreation in the area, and the close ties people feel to the land. We also recognize that many have used the land responsibly, and their impacts have been minimal. As public land managers, we are responsible for ensuring that the levels and types of public use do not compromise the establishing purposes of the refuge. For that reason, we need to consider whether increasing the levels of public use might affect refuge resources, or the uses might conflict with one another. We also recognize the importance of outdoor recreation for the local economy.

We intend to maintain the designated roads in a way similar to the way previous landowners maintained them: periodic major maintenance of designated roads, especially before, during, and after logging operations. The rest of the time, refuge staff and private contractors will perform only minor maintenance until we need the roads again for management purposes. We will allow the public access at their own risk over the designated roads in their current conditions. For comments and further discussion of access, please refer to “Road System” and “Access.” We reserve the authority to close designated roads at any time due to adverse or unsafe conditions, which was also the practice of past landowners.

One of the purposes for the final CCP/EIS in chapter 1, “Introduction,” is to “explain clearly to state agencies, refuge neighbors, visitors, and partners the reasons for management actions.” We believe that we have

accomplished that in the final CCP/EIS. Clear explanations of the regulations for all allowed public uses can be found both in the main document and in the relevant compatibility determinations.

Comment: Many who generally favored alternative A did so because they oppose expanding the refuge.

Response: Please refer to our response in this document under the sections “Implementation” and “Land Acquisition.”

Comment: We received a few comments that the refuge was unnecessary, and that wildlife species could take care of themselves. One mentioned that enough money has been spent already on wildlife, and that the area population of some species is increasing, such as eagles, black ducks, and ring-necked ducks, showing that what we are doing is working.

Response: We note the comment, and would like to refer the commenter to the official need for the refuge stated in the 1991 EA, “Proposal to Protect Wildlife Habitat Adjacent to Lake Umbagog”: “The Service recognizes previous land use patterns and private land stewardship as having maintained the unique wildlife values of the study area in the past. However, increasing demand for lakeshore lands and rising pressures for subdivision and second-home development are extending north to the Umbagog area. There is growing concern over increasing potential for timberland sales to large land development corporations.” Please see also our response in the section “Social Values” for a synopsis of the change in ownership patterns since 1991.

Comment: Commenters expressed the sentiment, especially at local public meetings, that the final alternative could be decided by a vote or show of hands, and that the response at those meetings was indicative of all public sentiment regarding the refuge and the planning process. Some stated that the feelings of the local residents should not be outvoted by the larger population outside the local area.

Response: The Service has been directed by Congress to make the final decision on a final alternative to be selected on behalf of the United States, and the Service may not legally delegate this decision to any subset of the Nation’s citizens. We held public meetings and solicited public comment in compliance with NEPA, and have taken all comments into consideration in formulating the final CCP/EIS. As a federal agency, we recognize that our decisions more directly affect local communities, and do our best to balance local needs with national interests and responsibilities. We have made several changes between the draft and final documents that reflect local interests, such as adding compatibility determinations for berry-picking, horseback riding, dog-sledding, and bicycling, with stipulations, and changing some of our proposals for boat launches.

All final decisions also must take into account the establishing purposes of the refuge, along with the laws, directives and policies that govern refuge management. For additional discussions of them, please refer to our responses in this document under “Access,” “Hunting,” and “Uses Determined Inappropriate”.

We received 14,269 separate comments on the draft CCP/EIS, 13,848 of which were organized, form letter responses. We received the remainder (421) at public hearings or in individual letters. The refuge staff read all of the comments, and considered them in preparing the final CCP/EIS.

3.2 Alternative B: Service-preferred Alternative

(Letter ID#: 4, 18, 19, 40, 61, 68, 69, 79, 81, 87, 89, 93, ,95, 99, 100, 101, 104, 109, 111, 117, 122, 126, 128, 133, 134, 136, 137, 143, 149, 151, 152, 155, 196, 233, 306, 308, 340, 359, 363, 398, 402, 899)

Comment: Some comments we received in favor of alternative B, the Service-preferred alternative, mentioned its wildlife management, habitat management, protection of biological diversity and biological integrity, watershed protection, enhanced opportunities for public use, and protection from development as reasons to support it. Other comments favored its active habitat management and targeted management strategies with measurable indicators.

Response: Thank you for your comments. We appreciate them.

Comments: We also received comments suggesting that we combine the management of alternative B with the land expansion of alternative C.

Response: We thank the commenters for their support, and refer them to the introductions to alternatives B and C in chapter 2 of the final CCP/EIS for our reasoning on the size of their proposed expansions. The planning team continues to support the modified refuge expansion proposal in alternative B in the final CCP/EIS.

Comments: A few comments specifically opposed alternative B. They stated that it would be detrimental to local citizens from an “economic and civil liberties standpoint.” Others expressed concerns about restrictions on recreation.

Response: Please refer to our response in this document under “Local Economy” and “Property Taxes,” the revised analysis of economic impacts in chapter 4 of the final CCP/EIS, under “Impacts on the Socioeconomic Environment,” and appendix G, “Economic Analysis.” Most of the comments related to perceived restrictions on access or recreational uses. In response, we have reconsidered our proposals for several public uses. In addition to the uses allowed in the draft CCP/EIS, alternatives B and C in the final CCP/EIS propose to allow dog sledding, the recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds, horseback riding and bicycling. Please refer to our responses in this document under “Priority Public Uses,” “Access,” “Other Public Uses,” “Remote Camping,” “Boating,” “Snowmobiling,” “Hiking,” “Uses Determined Inappropriate,” “Horseback Riding,” “Berry Harvesting,” “Dog Sledding,” and “Other non-motorized Recreation” for discussions of our modifications for those activities in the final CCP/EIS.

3.3 Alternative C

(Letter ID#: 4, 48, 62, 91, 103, 109, 111, 132, 133, 141, 151, 1518, 199, 233, 239, 240, 266, 273, 291, 315, 342, 344, 347, 349, 363, 3998, 451, 454, 575, 597, 631, 642, 696, 702, 708, 709, 713, 720, 721, 722, 726, 753, 767, 771, 790, 799, 823, 853, 855, 857, 864, 875)

Comment: A large volume of comments supported alternative C. Most of them specifically mentioned the refuge expansion, restoration of ecological processes, connectivity with other conserved lands, and the long-term protection of the area. They also cited alternative C as a long-term solution to habitat fragmentation and degradation of ecosystem function.

Response: Those comments generally recognize the refuge role in the larger landscape for the future. We agree that a larger refuge expansion would further protect the watershed of Umbagog Lake and increase the connectivity of habitats and conserved lands. We also appreciate the sentiment that the size of the proposed expansion under alternative C does the most in protecting land for future generations.

However, we feel that most of those values and processes will occur under our preferred alternative B. Furthermore, the conservation of wildlife and habitat in the Umbagog Lake area has been, and will continue to be, a partnership among the federal and state governments working alongside conservation organizations and private interests. We believe that partnership approach best serves wildlife conservation, and that our partners might protect some of the area proposed in alternative C.

Comment: Others mentioned a preference for alternative C because of its potential to provide a more primitive experience, by eliminating motorized recreation (typically snowmobiles) or segregating the refuge into areas of motorized or non-motorized use.

Response: We agree that the management philosophies in alternative C of the final CCP/EIS provide increased opportunities to enjoy a primitive experience and solitude. Although those recreational values are important to many commenters, we must balance our mission with local, regional and national interests to achieve our goals. We believe we can optimize wildlife habitat management by implementing alternative B while effectively providing priority uses and other public uses.

Although designating wilderness areas would restrict motorized use, our wilderness review of the current refuge (see appendix D, “Wilderness Review,” in the final CCP/EIS) found that it lacks large, contiguous blocks of land suitable for wilderness designation. However, non-motorized recreation is the only available means of travel in the areas without roads on the refuge. Visitors who want to experience the refuge under their own power might find satisfaction in those areas. If our regional director were to choose alternative C for implementation, then future wilderness reviews could result in proposals to designate wilderness areas.

Comment: Opposition to alternative C came from commenters who believe that it proposes purchasing too much land, which would result in an adverse impact on the local economy and the local way of life, especially if it imposed restrictions.

Response: We note the comments, and appreciate that concern. Please refer to appendix G, “Economic Analysis,” in the final CCP/EIS for an update on economic impacts. Also, please refer to our responses in this document that relate specifically to recreational uses of the land to see what changes we made between the draft CCP/EIS and the final CCP/EIS. After public comment and considerable reconsideration, we have allowed more public uses in the final.

3.4 Actions Common to All Alternatives

(Letter ID#: 100, 112)

Comment: We received a few comments about “Actions Common to All Alternatives” in chapter 2 of the draft CCP/EIS. They either supported generally, or were specifically in favor of, protecting rare habitats and systems and expanding the Floating Island National Natural Landmark.

Response: We appreciate those favorable comments.

3.5 Actions Common to Alternatives B & C Only

(Letter ID#: 21, 112, 137, 163, 168, 248, 408)

Comments: The comments compiled under this heading included support for either alternative B or C, or both, or a hybrid of the two. Other comments compiled under this heading critiqued the forest management plan in appendix K.

Response: Our responses in the sections “Alternative B,” “Alternative C,” and “Upland Forest Matrix Habitats and Species” address those comments.

3.6 Alternatives or Actions Considered but Eliminated

(Letter ID#: 31, 112)

Comment: One commenter wanted us to reassess managing refuge forested lands as a commercial private timber company would. The comment states that public lands are important as demonstration areas for good management practices, while ensuring the conservation of wildlife habitat along with timber production. It further states that the timber produced from public lands is important in supporting the forest products economy, and that the revenue provided by timber sales could support the management of public lands.

Response: We agree with the comment that public lands are important demonstration areas, which is one reason we propose a Land Management Research Demonstration Program (LMRD) for the refuge in goal 7 of alternatives B and C in chapter 2 of the final CCP/EIS. That is especially true for objective 7.2, “Outreach for Research and Applied Management Program,” an objective in both alternatives.

As we state in chapter 2 of the final CCP/EIS, under “Alternatives or Actions Considered but Eliminated from Detailed Study,” operating in a way similar to that of a commercial private timber company would not meet the goals and objectives we have established for the refuge. Although our ultimate goal is wildlife management, we

also intend to use commercial harvest techniques for habitat management, and believe that they will be effective and profitable. We intend to use the revenue from timber sales to support habitat management. Please refer to our economic analysis in chapter 4 of the final CCP/EIS and in appendix G, “Economic Analysis,” for our discussion of the anticipated impact on the forest product economy, as well as our responses in this document under “Upland Forest Habitat” and “Land Acquisition.”

Comment: The same commenter urged us to work with the Natural Heritage Bureau for assistance with specific strategies for protecting and managing sensitive wetland systems.

Response: We appreciate the comment, and plan to work with the bureau on future projects.

3.7 Range/Comparison of Alternatives

(Letter ID#: 96, 98, 107, 152, 292)

Comment: One commenter stated that the process we used in developing the range of alternatives was exemplary. However, others were critical. Some commented that many of the actions we propose in alternatives B and C could be done on existing refuge lands. Another felt that none of the alternatives represented “what the people in the area want.”

Response: We thank those who complimented our range of alternatives and the detailed analysis that accompanied it. We must respectfully disagree with those who felt we did not develop and evaluate a reasonable range of alternatives. We believe we developed a reasonable range, given the purpose and need of the document and the purposes for which the refuge was established (see final CCP/EIS chapter 1). Those who felt that many of the actions we propose in alternatives B and C could be done on existing refuge lands appear primarily to oppose the refuge expansion proposal. We will alert our regional director, who will make the final decision on which actions to implement, about public concerns over refuge expansion. He will also have the chance to review all the public comments. In making his final decision, he has the authority to choose an alternative as we present it in the final CCP/EIS, or select from among the alternatives a combination of the actions we evaluate. The commenter who felt that none of the alternatives reflected what locals want did not provide any specifics, so we cannot respond directly to that comment.

Comment: One commenter suggested we scale back our inventorying, monitoring, and biological research, because all that activity around wildlife might be disturbing them.

Response: Alternative B in chapter 2 of our final CCP/EIS proposes a level of inventorying, monitoring, and biological research that we think is reasonable and commensurate with the funding and resources we seek over the next 15 years. In our opinion, doing less would not meet our Service or Refuge System missions or the purposes for which the refuge was established.

Comment: One commenter felt that evaluating a reasonable range of alternatives should include an alternative without sport hunting. That person felt that our incorporating the 2007 EA we prepared for the refuge hunt plan, which did include a “no hunt” alternative, constrains the range of alternatives.

Response: The Improvement Act establishes hunting as a priority public use on national wildlife refuges. We have an established, quality hunting program on the refuge. We evaluated it, including public comment, in 2007. It is not unusual, and fully within NEPA regulations, to incorporate by reference the decision in a relatively recent NEPA document, which is what we have done in referring to the hunt plan EA decision in the final CCP/EIS.

3.8 New Alternatives Proposed by Commenter

(Letter ID#: 110, 138, 152, 292)

Comment: One commenter proposed we relocate refuge personnel to other refuges, and let nature take care of the refuge. Then we should compare who did the better job.

Response: We do not feel that would be prudent or responsible. We believe that we have analyzed a sufficiently wide range of alternatives, as we discuss in the previous section. Eliminating staff from this refuge would not meet the purpose and need of the proposed action, nor would it meet the purposes of the refuge or the mission of the Refuge System. We would not be able to offer services and programs on the refuge, which many people enjoy. Furthermore, closing major areas on the refuge to protect resources and ensure visitor safety might become necessary. The diminishment of those benefits would be a big loss to the community.

Issues with individuals or the collective refuge staff fall outside the scope of this document. Those should be raised with the Refuge Supervisor —North, stationed at our Northeast Regional Office in Hadley, Massachusetts.

Comment: Another commenter stated that a fourth alternative might be to expand the present refuge boundaries (approximately 6,000 acres) to the original conservation partnership proposal defined in the 1991 EA establishing the refuge.

Response: We appreciate that comment, but feel that, in light of the current changes in patterns of land ownership and use, the need for watershed protection, and the species needs identified in conservation plans for the region (see in chapter 1 of the final CCP/EIS “Conservation Plans and Initiatives Guiding the Project”), a broader land conservation effort is needed. We believe that we have analyzed a sufficient range of alternatives (see previous section).

Comment: Another commenter suggested that we manage the refuge for mature forests.

Response: We appreciate the comment, but do not feel that it warrants an entirely new alternative. Please refer to our response in this document under “Upland Forest Matrix Habitats and Species.”

4.0 Refuge Physical, Biological and Socioeconomic Resources

(Letter ID#: 6, 16, 35, 50, 86, 87, 90, 91, 101, 109, 111, 112, 114, 118, 120, 121, 128, 131, 134, 137, 152, 158, 160, 229, 230, 248, 256, 269, 308, 315, 320, 326, 341, 345, 346, 364, 388, 393, 415, 428, 431, 434, 445, 592, 594, 596, 600, 604, 624, 625, 626, 627, 631, 678, 685, 710, 717, 804, 809, 835)

Comment: We received several comments on the value of conserving lands and ecosystems in the Northeast, where human population densities are high. Some individuals expressed the desire to see land protected both for wildlife and recreation as well as for research. Some felt that expanding the refuge might contribute economically, through increased tourism, or might help mitigate global warming. One pointed out the economic value of the “natural services” intact ecosystems provide, including the storage of floodwater, protection of water quality, prevention of erosion, etc.

Response: We thank those commenters for their support of our proposed land protection. We agree that our land protection plan is likely to protect wildlife habitat and offer recreational opportunities. Keeping land from being developed, and maintaining it in a generally forested condition, is also likely to promote carbon sequestration. We also expect economic benefits to accrue to the local community from the expansion, programs, and management of the refuge.

Comment: Some commenters expressed a preference for the quiet that comes with the absence of motorized vehicles.

Response: Final CCP/EIS appendix D, “Wilderness Review,” presents our rationale for not proposing any part of the refuge for wilderness designation (a designation that would prohibit motorized activity). Certain areas of the refuge will remain inaccessible to motorized vehicles, and might provide the desired solitude. Please refer to our responses in this document under “Other Non-motorized Recreation,” “Access,” “Priority Public Uses,” “Boating,” “Off Road Vehicle Use” and “Snowmobiling, Alternative C”

Comment: A number of commenters opposed the refuge expansion. Their reasons included concerns about negative economic impacts on the local community, including the loss of forest-related jobs, and concerns about losing access or opportunities for recreation. Some commenters also felt that the refuge should do a “better job

with what they have” before we consider any expansion. Others thought we were not considering the needs of people enough.

Our analysis in the final CCP/EIS chapter 4, “Environmental Consequences,” under “Socioeconomic effects of Alternative B,” and in appendix G, “Economic Analysis,” projects an overall increase in visitation and economic benefit that would be greater under alternative B than it would under alternative A. Because alternative A lacks a timber harvest, but alternative B offers one, we can expect alternative B to contribute more to the local forest products economy (refer to chapter 4; also chapter 2, alternative B, goal 3; and appendix K, “Forest Management Guidelines”). We expect that the owners will have removed the harvestable timber from most of the land we purchase. The jobs generated by timber harvesting would continue before the sale, and would also continue on private lands around the refuge. We would like to remind our readers that we would acquire land over many years, and that change would be gradual. Should we acquire well-stocked, harvestable forests, we would apply the forest management techniques we describe in the CCP to improve wildlife habitat, during which time, and periodically throughout the management of those habitats, the employment driven by forest products would continue. Please refer also to our responses in this document under “Social and Economic Values,” “Local Economy,” and “Tourism.”

We listened to the public comments on access and recreation, and have modified our preferred alternative B in the final CCP/EIS to take into account many of those concerns. As a result of public input, we propose in chapter 2, alternatives B and C, to open the refuge for the following additional uses, with stipulations to ensure their compatibility: horseback riding, bicycle riding, dog sledding, and the recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds. Appendix C, “Compatibility Determinations,” presents our rationale for each of them. We believe that alternative B offers the best opportunity to improve our habitat and species management as well as our visitor services, and would allow us to do a “better job with what we have” than we could do under alternative A. Also refer to our responses in this document under “Land Acquisition,” “Implementation,” “Priority Public Uses,” “Other Public Uses,” and “Other Non-Motorized Recreation.”

Comment: Several commenters expressed the support for alternative B and our proposed focal species habitat management, conservation of the mixed matrix forest, and enhancement of priority public uses.

Response: We thank them for their support of our proposed refuge management priorities.

Comment: Some commenters expressed concerns about the implementation of the preferred focal species management approach under alternative B. They warned that the proposed refuge forest management strategies for certain species, such as woodcock, might result in the fragmentation of habitat for other focal species that depend on large blocks of unfragmented, closed canopy forest.

Response: Although we considered that concern in our planning team discussions, we have now made it more explicit in the final CCP/EIS. We intend to develop a forest habitat management plan that takes into account the refuge- and landscape-level impacts of our management activities. As one commenter noted, many of our upland focal species require large blocks of unfragmented habitat, or require a generally forested landscape. To be effective over time, our management will need to provide the appropriate structure, patch size, and connectivity those focal species require.

The objectives and strategies the final CCP/EIS lists under goal 3 of alternative B mention that we would use a range of silvicultural approaches in forest management, consistent with site capability, to benefit federal trust species and other species of conservation concern. We do not intend to use all of those harvesting methods on every acre of upland habitat. Instead, we will tailor our approach to specific site conditions and the requirements of our focal species (including their patch size requirements), using each method only where it is appropriate. Although some of our forest management activities might, in the near term, reduce habitat suitability for some species in some areas, our objective is to create and sustain functioning blocks of habitat on the landscape over the long term. Most of our focal upland bird species share similar requirements for relatively large blocks of closed-canopy forest, so our managing for those species should not create conflicts among our management approaches (see final CCP/EIS appendix N, “Process for Establishing Alternative B Focal Species”).

Our management for species that require larger openings, such as the American woodcock, would concentrate in designated woodcock focus areas (see final CCP/EIS, chapter 2, map 2-2, “Woodcock Focus Areas”), thus leaving large blocks of forest that we will manage primarily for our other focal species. For the 15-year span of the final CCP, we are also proposing to concentrate active forest management primarily in our low resource sensitivity zone (see final CCP/EIS appendix K, map K-1 and table K-1). Much of the refuge consists of forested wetlands and some forested uplands that are included in our “high resource sensitivity zone” and will not, for the most part, be subject to significant active timber management. Those will provide substantial areas of unmanaged forest for species that require interior forest (map K-1; also refer to our responses in this document under “Upland Forest Matrix Habitats and Species”). We also do not anticipate acquiring large blocks of well-stocked upland forest in the proposed expansion area over the 15-year course of the plan. That makes significant commercial timber harvesting on new acquisitions unlikely during that time.

Comment: Several commenters expressed their confusion over how we prioritized refuge habitats for management, particularly in appendix N, table N-5. They were concerned that we assigned several types of wetland habitat a lower priority than some types of upland forest habitat, and that our management might favor those upland types at the expense of the wetland types. They also questioned our designating the American black duck as a focal species, when it is hunted.

Response: The final CCP/EIS, appendix N, “Process for Establishing Alternative B Focal Species,” states that the conservation of wetland habitats is our highest priority (see section 3.1 and table N-1). The conservation of federal trust resources is also part of the Refuge System mission and a high priority for the refuge. We recognize that table N-5 might have been confusing, and changed it to help clarify it. It shows the habitat types we intend to manage actively over the next 15 years, and their associated focal trust resources. We do not intend it to establish a hierarchy of conservation priorities. The table includes boreal fens and bogs and cedar habitats as a moderate management priority, and some mixed forest types as a high management priority, because we feel that our upland spruce-fir and mixed woods habitat types would require active management over the next 15 years, while we anticipate little active management of our bogs and cedar swamps during that period. We would direct our resources at the fen and cedar habitat types, but our strategies would focus on acquiring and protecting the wetland types, rather than more active management. We have no intention of managing refuge upland habitat types at the expense of wetland types. We will only implement forest management using the methods, and in areas, that will not impact wetlands (see final CCP/EIS appendix K, “Forest Management Guidelines,” map K-1).

We identified the American black duck as a focal species for management primarily because of its status as a trust resource, its dependence on wetlands, the emphasis it received in the 1991EA establishing the refuge, and its importance in a number of avian conservation plans (see final CCP/EIS chapter 2, alternative B, goal 1). We consider federal trust resources all migratory birds, including waterfowl, that we are mandated to conserve. That mandate applies to migratory bird species, regardless of whether they are hunted. The hunting of black ducks and other waterfowl is managed on a flyway basis, to ensure against over-harvesting (see also in this document our response under “Hunting”). Although populations of the black duck historically have declined, they are now stable or increasing. Our management for black duck habitat will help keep populations stable, and will aid in improving habitat quality for other wetland-dependent species with similar requirements.

Comment: One commenter supported our making the control of invasive species a high priority. That commenter supported the use of herbicides, where appropriate.

Response: Controlling and preventing invasive species is a high priority for the refuge (see final CCP/EIS chapter 2, under “Actions Common to All of the Alternatives...Control of Invasive Plant Species...Strategies”), and we will continue to work with state agencies and other organizations on this issue. Please refer to our response in this document under “Open Water and Wetland Habitats and Species: Invasive Species.”

Comment: One comment advocated a mix of natural processes and focal species management. The commenter felt that natural processes could be relied on to adequately sustain a healthy ecosystem without human intervention. However, that person also recognized that, if some species were at risk, they might require additional help.

Response: Although we agree that, over the long term, natural disturbance regimes help sustain native ecosystems, the refuge is starting from a baseline landscape that has been substantially modified by human activities (primarily timber harvesting) over the past several hundred years and is now facing the additional stress of future climate change. We believe that the management strategies we propose in the final CCP/EIS, alternative B, would help facilitate the more rapid development and maintenance of high-quality habitat than we would expect to see under an exclusively natural disturbance regime, given the human-modified baseline and stressors we face now. A focal species management approach also enables us to prioritize our trust resources for management. However, because much of the refuge consists of non-forested and forested wetlands that we include in our high resource sensitivity zone, and will not, for the most part, be subject to significant timber management, we expect substantial areas of essentially unmanaged habitat, where natural processes will predominate. (See map K-1 in final CCP/EIS appendix K, “Forest Management Guidelines”; refer also to our responses in this document under “Upland Forest Matrix Habitats and Species” and “Alternative C.”)

Comment: One state agency offered to cooperate in fire management on the refuge.

Response: We welcome that offer, and appreciate its support.

5.0 Refuge Administration

(Letter ID#: 18, 20, 64, 97, 107, 108, 110, 111, 112, 128, 135, 307, 375, 392)

Comments: We received a few comments about our current and proposed administration of the refuge. Some opined that we have done a commendable job. Others questioned our capacity to manage the refuge.

Response: We would like to thank those who commented in support of our administration. We strive to accomplish as much as we can with the resources we are provided. We appreciate your support.

We understand the comments that question our ability to manage the refuge at its present size. Although the first purchase of land in 1992 established the refuge, we have purchased most of the present refuge since 2000 (see final CCP/EIS appendix A, “Land Protection Plan”). Since that time, we have conducted baseline surveys of wildlife, while performing basic operations (administration, maintenance, etc.) and planning. We also have been working through our internal systems to identify projects and acquire funding. Completing the final CCP will help facilitate funding for, and the completion of, projects throughout the refuge.

Comment: One comment mentioned the lack of funding from Congress, and how that restricts our capacity to manage the refuge.

Response: Although we agree that the Service budget has suffered cuts over the past few years, the funding for the current fiscal year markedly improved. Workforce planning in the region, as well as nationwide, combined with increased attention from Congress, put the Service in a favorable position to increase its field station management capability. Please refer to our response in this document under “Staffing and Funding” for more on this comment.

Comment: We received one comment questioning what the refuge has done to facilitate public use.

Response: To date, we have constructed our current headquarters, with a visitor contact station, picnic tables and restrooms. We have also constructed the Magalloway River Trail, with its parking area and overlook. We have maintained open access to boat launches and many logging roads. We have constructed and placed waterfowl blinds, and have also maintained remote campsites on refuge property. Where we have purchased property, we have facilitated public use by eliminating the potential for a private landowner to close the property to public access or use.

Please refer to chapter 3 in the final CCP/EIS, under “The Refuge and its Resources,” for a description of what we provide to facilitate public use. Chapter 3 describes the management condition of the current refuge and

the specific programs and services we offer. That current management is also represented by alternative A in chapter 2, “Alternatives Considered, Including the Service-preferred Alternative.” A map depicting the current and proposed public use can be found in the final CCP/EIS, chapter 2, map 2-5 (alternative A, “Current Management”), and maps 2-8 and 2-9 (alternative B, “Service-preferred Alternative”). Those represent the present and future improvements of public use in each alternative.

Comment: We received another comment seeking clarification between the first and last paragraphs of the draft CCP/EIS, chapter 3, in the section “The Refuge and Its Resources...Establishment.” Specifically, the comment seeks clarification on what takes precedence, the 1991 EA that proposed the refuge or Congress’ establishing purposes for it. The commenter also asks if preserving existing land uses can be incorporated as a supportable objective and, if not, does that doom the long-term use of conservation easements within the refuge boundary.

Response: When we evaluate land use within the refuge, we consider both the 1991 EA that established it and its official establishing purposes. However, the establishing purposes take precedence, according to the Improvement Act and related policies. As a federal agency, we must comply with federal laws and policies. When Congress passes a new law, it might supersede previous refuge management decisions or documents. For example, the Service compatibility policy changed between 1991, when we wrote the EA, and 1997, when the Improvement Act became law. We cannot predict future laws, but we have done our best to describe in the final CCP/EIS the desired future condition of the refuge, based on the EA and current influences, including federal laws and policies.

We seriously considered public comment in evaluating public use of the refuge. We also consulted the 1991 EA in making decisions and preparing planning documents like the final CCP/EIS. Compatibility policy, as defined by the Improvement Act, requires the refuge manager to determine whether a use is compatible with the purposes for which the refuge was established. For more on this topic, please see our response in this document under “Priority Public Uses.”

We cannot incorporate all of the existing land uses (such as commercial timber harvesting) as stand-alone objectives in this plan. Not all uses would be considered part of our mission, even though we might use some as management tools, e.g., commercial timber harvesting. Some historic land uses, such as commercial timber harvesting, are management activities, and we believe that the final CCP/EIS clarifies our intent to use that management activity to achieve our habitat management goals. Because timber harvesting is inherent in our habitat management strategy, we do not feel it necessary to raise it to the level of an objective in the final CCP/EIS. Please refer to final CCP/EIS appendix C, “Findings of Appropriateness and Compatibility Determinations”; appendix K, “Forest Management Guidelines”; and final CCP/EIS chapter 2, alternative B, goal 3, for additional discussions on our preferred alternative and forest management.

We see no reason why the operation and administration of the refuge described in the final CCP/EIS would preclude the long-term use of conservation easements within the refuge boundary. In fact, we have included the use of conservation easements in our preferred alternative and in our land protection plan (see final CCP/EIS appendix A, “Land Protection Plan” and the discussion in the objectives in goals 1-3 of alternative B in chapter 2 of the final CCP/EIS. Map 2-6 in that chapter graphically presents our plan for easements under our preferred alternative.

Comment: Others commented on the proposed name change. We received some positive comments that the name better reflected refuge management, while others felt it would be too costly to change the name.

Response: We stand by our recommendation to change the name of the refuge to the Umbagog National Wildlife Refuge. We detail our rationale in chapter 2 of the final CCP/EIS, under “Actions Common to All of the Alternatives.” In summary, the present name has caused a fair amount of confusion about the refuge and its responsibilities, and we believe the new name better represents the broader geographic context and management emphasis of the refuge in all of the alternatives.

Comment: Another commenter was concerned about leased lands and the impact that buying and letting those leases expire would have on the local economy, since the lease payments return to the local towns in the form of payments in lieu of taxes.

Response: We stand firm on our decision to honor current leases, purchase camps on leased lands from willing sellers, and allow the leases to expire at the end of their 50-year terms. It is true that those lease payments contribute to a general fund that, in turn, is used to fund refuge revenue sharing payments to local towns. Each year, Congress appropriates additional funds for those payments, which are calculated by formulas also determined by Congress. See our discussion in chapter 2 of the final CCP/EIS, under “Actions Common to All Alternatives...Distributing Refuge Revenue Sharing Payments.”

Comment: One commenter was concerned about our accumulating rolling stock (SUVs, pick-up trucks, snowmobiles, boats and trailers, backhoes, loaders, a grader, tractors, or dump trucks) that would require the construction of a new maintenance facility and thus, more real property requiring maintenance.

Response: We believe two issues arise in that comment. The first is a criticism of the number of vehicles and heavy equipment the refuge acquired, in comparison to the number of its permanent staff. The second is the construction of the maintenance facility and its long-term maintenance.

We have acquired a fleet of six vehicles and six boats for the refuge. We agree that number exceeds the number of current, full-time, permanent staff (four and one-half refuge staff and one regional biologist). However, that comparison does not take into account seasonal or volunteer staff and research personnel. For example, during the 2008 field season, refuge staff numbers will swell to 20, with 15 interns, researchers, Youth Conservation Corps members and volunteers assisting the permanent staff. The comparison also does not take into account the fact that the workforce planning resulting from diminished budgets reduced the number of full-time staff at the refuge in 2006. It is now more cost-effective for the refuge to keep the number of vehicles and boats that it has, than to pay more to lease the boats and vehicles annually to meet our demands. The staffing charts in appendix H of the final CCP/EIS show that we plan to increase our permanent staff to implement our preferred alternative. As before, when staff numbers increase, it is more cost effective to maintain the current fleet than to lease or purchase new vehicles and boats.

As for the number of heavy equipment items and specialty use vehicles like snowmobiles, we carefully consider present and future workloads and maintenance needs when we acquired them. We acquired some of them from other refuges or as excess property from the Department of Defense at little or no cost. We consider the costs of renting equipment and contracting when we consider purchasing a piece of equipment, to ensure that the cost-benefit ratio outweighs the other options. We feel we have acquired the equipment appropriate for performing our duties, whether a winter animal track survey, road maintenance and other duties in support of our annual work plan or to meet the future needs of the refuge.

Like all government agencies and large private companies, the Service maintains a regional and national equipment replacement program. That program uses the mileage, age, level of use, and condition of equipment to determine its replacement priority.

As for the maintenance shop, it was not built to accommodate the number of vehicles, boats, snowmobiles and heavy equipment the refuge uses. We built it to provide the refuge with a centrally located facility to improve the efficiency of our operations and refuge maintenance functions. Those include building and roads maintenance, habitat management, and equipment maintenance, just to highlight a few. The building is a standard-design pole barn with metal siding walls and roof.

Comment: A few comments voiced the concern that the refuge manager has too much control over the public uses on the refuge. Some recommended that decisions should be made by a committee that includes local residents and businessmen, while others suggested that the refuge manager should not be able to stop a public use at his discretion.

Response: We understand the comments. However, some of the language the commenters are responding to comes from the Improvement Act and subsequent Service policy on appropriateness and compatibility. That law and subsequent policies are national in scope, beyond the scope of this final CCP/EIS. We considered several public uses, and determined that their current level did not materially interfere with or detract from the purposes for which the refuge was established. Should those uses rise to a level that interferes with or detracts from those purposes, it would compel the refuge manager, as the primary steward of the refuge, to document the issues

and modify or close the uses. Every compatibility determination includes stipulations necessary to ensure the compatibility of the use. Ensuring that those stipulations are satisfied is essential in keeping a use compatible.

Congress has delegated the management of the National Wildlife Refuge System to the Service; the Service may not legally abdicate that responsibility to any other entity. Accordingly, the Service welcomes public comment, and the viewpoints of others, but cannot delegate its decision making responsibility.

5.1 Land Acquisition

(Letter ID#: 6, 12, 15, 19, 26, 30, 32, 33, 35, 40, 42, 48, 50, 60, 67, 71, 80, 81, 83, 85, 86, 87, 91, 96, 97, 99, 101, 104, 107, 108, 109, 110, 111, 112, 118, 119, 124, 128, 129, 133, 134, 135, 136, 137, 141, 146, 148, 149, 150, 151, 153, 158, 162, 164, 166, 167, 169, 172, 173, 175, 176, 179, 183, 186, 187, 192, 199, 202, 207, 214, 222, 224, 227, 228, 230, 232, 233, 236, 237, 239, 240, 245, 246, 253, 260, 263, 265, 267, 273, 274, 275, 282, 288, 290, 296, 307, 308, 309, 313, 315, 318, 319, 320, 321, 325, 326, 336, 337, 340, 342, 344, 346, 347, 348, 350, 360, 364, 375, 378, 379, 383, 386, 388, 393, 396, 398, 400, 403, 421, 423, 425, 426, 427, 428, 432, 436, 437, 441, 442, 447, 4448, 451, 454, 610, 693, 713, 196, 876)

Comment: We received many comments for and against additional land acquisition. Most of them supported our expanding the refuge land acquisition program.

Response: We thank those commenters for their support of our proposed land acquisition program. We believe it will significantly advance our ability to meet refuge habitat goals and objectives for the wildlife species the final CCP/EIS identifies.

Comment: The majority of the comments opposing land acquisition expressed a concern that it would reduce access, restrict permissible activities, and produce additional, burdensome regulations. Those comments generally also supported alternative A, because of its more limited land expansion. The commenters were concerned particularly that we would eliminate or restrict hunting, fishing, snowmobiling, using ATVs, and development on any new lands we acquired. One comment expressed a desire for things to “remain the way they are.”

Response: The Improvement Act identifies hunting, fishing, wildlife observation and photography, and environmental education and interpretation as the six priority wildlife-dependent public uses that are to receive enhanced consideration in refuge planning. Our mandate is to provide high-quality opportunities for those priority uses when they are compatible with refuge purposes, goals, and other management priorities.

We intend to facilitate or remain open to those wildlife-dependent uses, when they are compatible, on the existing refuge and on any new lands that we acquire. (See also our responses under the sections on hunting, fishing, interpretation and environmental education). Although the refuge might regulate certain uses to ensure their compatibility, we believe that we have now accommodated most of the uses brought up in the public scoping process (see final CCP/EIS appendix C, “Findings of Appropriateness and Compatibility Determinations,” and our responses in this document under “Priority Public Uses,” “Other Public Uses,” “Access,” “Snowmobiling,” “Horseback Riding,” “Hiking,” “Other Non-Motorized Recreation,” “Berry Harvesting,” “Dog Sledding,” “Alternative A,” and “Alternative B”).

We intend to extend to any new lands we acquire the approach we have taken on the access and public use of current refuge lands. The refuge is closed to ORV use (see responses in “ORV Use” and “Uses Deemed Inappropriate”), and we continue to stand by that decision. Development also is precluded on the refuge, and would not be permitted in the proposed acquisition area on either easement or fee ownership. Given the changing patterns of land use and ownership in the Umbagog area, we believe that our acquisition of additional land provides a greater certainty of long-term public access.

Comment: Several local camp owners and lessees expressed a concern that plans in alternative B of the draft CCP/EIS, particularly its proposed new structures, trails, parking areas, and viewing platforms, would have a negative impact on their quality of life.

Response: Although we expect some increased disturbance of local residents and wildlife as a result of expanding our public use program, we feel our proposal represents a balance between accomplishing our public use goals and objectives and protecting wildlife and the environment of the refuge and its neighbors. Also, please see our response about the Potter Farm under “Buildings.”

Comment: Some commenters opposed land acquisition because of concerns about inadequate funding and the ability of the refuge to maintain newly acquired buildings, roads, or land. Some expressed the sentiment that the refuge wastes money, is not doing a good job of maintaining buildings or taking care of property now and, therefore, could not be entrusted with properly maintaining new acquisitions, or, that the refuge “finish its current plan” before undertaking a new one. Some disapproved of how the refuge manages land: e.g., “projects are a waste of money and not of particular value to wildlife or to enhance the natural experience for people.”

Response: We discuss our desired future condition for the refuge in our vision statement and throughout our preferred alternative B in the final CCP/EIS. As we state on the inside front cover of the final CCP/EIS, these plans provide long-term guidance for management, strategic planning, and program use. They do not constitute a commitment for increased operational funding. We believe that recent cuts in funding due, in part, to increases in federal spending on disaster recovery and wars, influenced some of those comments. Under our present budget and its potential increases in the future, we believe that we will have sufficient funding to act on the recommendations in the preferred alternative.

“Actions Common to Alternatives B and C Only” in chapter 2 of the final CCP/EIS clarifies our intent to keep open certain roads as designated routes of travel. Also in chapter 2, maps 2–8 and 2–9 in alternative B display the roads we would keep open. We intend to maintain them in a way similar to that of the previous landowners: that is, perform major maintenance as part of habitat management operations, (e.g., logging), and minor maintenance between management cycles. Please refer to our response in this document under “Access” for a more detailed response on road maintenance.

We also have clarified our desire to provide various public use facilities and buildings, as funding allows. We will consider the funding for their maintenance before we build them, to ensure that our budget can provide a high-quality experience for refuge visitors. Furthermore, constructing new facilities, such as the maintenance building, is crucial in accomplishing our mission. Before we build them, we will consider the cost of operating and maintaining them.

We remove the camps we acquire as funding becomes available (see “Alternative B” in this document). We have removed 15 camps, and plan to remove another four this year. We will review the sites of the camps we removed previously, clean up any debris remaining, and plant trees as needed. We do not plan to continue to maintain any camps, and will work toward restoring them to their appropriate habitat conditions.

The only houses or properties we will maintain, other than administrative facilities, are our “quarters” buildings: the Stranger house, the Carman house, the Coffin house, and the Costello house. We use them primarily as housing for temporary and permanent staff. The full-time permanent staff pay rent, which we use to maintain the quarters. This year, we housed researchers in the Costello house, which is now scheduled for demolition. Thereafter, we will maintain the other three buildings as refuge quarters. After reviewing the refuge quarters program, we consider that number sufficient for meeting the need.

We disagree with the comment that projects undertaken by the refuge are a waste of money. The projects at the refuge benefit its purposes, goals and objectives. We design them to handle a commercial level of use and minimize maintenance costs. Their design draws upon our experience in managing public use in our agency and other agencies nationwide. We put out every project for a competitive public bid, and award it to the lowest bidder, as all government agencies do.

We recognize the sentiment underlying the comments that we should do better with what we have before proposing or moving forward with the refuge expansion. We have proposed an alternative that we believe best meets the mission of the refuge under its present and desired future conditions. An expanded refuge land base is one important aspect of that plan, designed to meet the needs of wildlife, based on changing patterns of land

ownership and habitat. Alternative B in the final CCP/EIS proposes we work toward the desired goals of the commenters by improving education and recreation programs and clearing or cleaning up recently purchased properties. Please see also our response in this document under “Implementation.”

Comment: A number of commenters were concerned about a loss of tax revenues by local communities or an increase in property taxes if we acquired more refuge land. Others felt it would restrict public use, reduce the number of visitors, and have a negative impact on the local economy. One individual felt that the public “should not have to compete with government on buying a home, property, or seasonal camp.”

Response: We listened to those concerns, and re-evaluated our acquisition strategies. As a result, we increased our acquisition of easements in the towns that a potential loss of tax revenue would affect most. The annual payments from the refuge revenue sharing program further mitigate impacts on property tax. As part of our review of the analyses in the draft CCP/EIS, we realized we had not accounted for a special tax rate on forest lands in the State of Maine. That new information, coupled with our recommendation to change some of the proposed fee acquisition in Maine to easement acquisition, resulted in a revision we believe is both credible and accurate (see appendix G, “Economic Analysis,” in the final CCP/EIS and “Property Taxes” in this document).

Our economic analysis of expanding the refuge shows a moderate increase in the number of visitors and a positive impact on the local economy (see our responses in this document under “Local Economy” and in final CCP/EIS appendix G). Expanding the refuge would benefit the local economy both directly, by increasing the expenditures of the refuge for goods and services in the local community, and indirectly, by increasing the number of visitors to the area and a concomitant increase in their expenditures. We feel that expanding the refuge would maintain public access on those lands by protecting them from private development. Even under the descriptions of alternative A (no expansion) in appendix G, the refuge provides a substantial economic benefit for the local community, and plays a role in attracting increasing numbers of visitors to the area. Our economic analysis shows that, under alternative A, the refuge management activities in all refuge operations generate an estimated \$1.45 million in local output. Under alternative B (refuge expansion), we estimate that value at \$2.72 million, an increase of \$1.27 million. Under alternative C, we estimate that value will increase to \$2.84 million.

Under its willing-seller-only policy, the Service purchases property only from willing sellers at fair market value (i.e., the reviewed, approved, appraised value). Under that policy, private landowners might choose to whom they sell, and are not compelled to sell to the government, nor do we pressure them to do so.

Comment: Many commenters urged us to acquire land only from willing sellers, and refrain from pressuring private landowners to sell.

Response: We agree with that comment (please see our previous response about our willing-sellers-only policy), and remind our readers that we have no desire to pressure private landowners to sell.

Comment: Generally, the commenters who supported the refuge expansion also supported the land acquisition components of alternative C or, to a lesser extent, alternative B. The primary reasons they cited were conserving as much land as possible, protecting wildlife, natural resources, and ecosystems at the landscape scale, and preventing development. Other reasons they mentioned included keeping the area wild, restoring natural ecosystem processes, linking with other land conservation efforts in the region to provide more contiguous habitat for wide-ranging wildlife, protecting air, water and habitat quality, providing more flexibility in protecting land, and protecting land for future generations. Some commenters highlighted the importance of providing habitat for woodcock and other birds of conservation concern. Several expressed a sense of urgency about acquiring land. One stressed that we could defer or change our decisions about land management later; but the land needed to be protected now, while the window of opportunity is still open.

Response: We concur with the comments of those who emphasized the urgency and importance of acquiring land in conserving habitat and wildlife around Umbagog Lake and providing connectivity with other conserved lands. However, we feel that the land we propose to acquire in alternative B is of sufficient size to provide the flexibility we need to achieve our habitat management goals and objectives. For the rationale underlying the size of our

proposed preferred expansion, please refer to the introductory sections of alternatives B and C in the final CCP/EIS, as well as our responses in this document under “Alternative B” and “Alternative C.”

In the final CCP/EIS, alternative B, goal 3, objective 3.1 proposes to establish woodcock focus areas on approximately 2,600 acres of the refuge and proposed expansion area, where we would manage forests primarily for the American woodcock, Canada warbler, and other species with similar habitat requirements. For the location of the woodcock focus areas, see map 2-2 in chapter 2 of the final CCP/EIS. In those areas, we would promote understory development and early succession habitat, using 8- to 10-year cutting cycles on a 40-year rotation. For additional discussion, refer also to chapter 2 in the final EIS/CCP, alternative B, goal 3, objective 3.1, sub-objective 3.1d, “Woodcock Focus Areas.”

Comment: A number of commenters supported refuge land acquisition because they felt that Service ownership was more likely to preserve continued public access. They expressed concern that increasing private ownership and changes in the timber industry from “industrial forest landowner to the short-term investor owner” might result in curtailing public access. One commenter argued that the public would have more input on decisions about public access and land use under federal government ownership than it would under private land ownership, particularly if distant corporations were involved.

Response: We agree that the changing patterns in land use and ownership have the potential to threaten public access on much of the land in our proposed expansion area. That was one of the factors we considered in designing the proposal. It is also true that the CCP process provides an avenue for the public to be heard in ways generally impossible when the landowner is a private entity. Because the final CCP/EIS sets our management direction for the next 15 years, public input has a substantial impact. We welcome and appreciate the comments of those who took the time to participate in the planning process, and hope you will stay involved as the plan moves forward.

Comment: Some commenters favored acquiring easements more than acquiring fee title, while others were comfortable with the use of either method as appropriate. The proponents of acquiring only easements argued that they would be less costly, more cost-effective, easier to fund, and could accomplish conservation goals in a way more acceptable to the public. Some commenters felt that, over the long term, easement acquisition was more likely to continue traditional uses such as forestry and recreation than fee acquisition was. One felt that our purchasing easements might help reduce the amount of “liquidation” logging before we purchased them. The same commenter suggested that, if we owned easements, we could leave our timber management in support of habitat needs in the hands of private owners of timberland, relieving us of the need to hire a forester and allowing refuge staff to concentrate on wildlife. One commenter who supported both easement and fee acquisition suggested that the proportion of fee title to easement should remain flexible to accommodate different landowners, and should not be tied to a specific ratio. Another suggested that easements require “vegetation management for habitat improvement.”

Response: The Service can acquire only the rights the landowners are willing to sell. If they are interested in selling only easements, then those are what we will purchase. Conversely, some landowners might be interested in selling fee title. In some cases, buying fee title might be more cost-effective than buying an easement, if buying the fee title costs only slightly more than buying the easement does. We agree that we must remain flexible in our negotiations, as one commenter suggested.

We recognize the value of easements in some situations mentioned by several commenters, and have increased the proposed percentage of land under easement from 35 percent to 44 percent in the expansion area. In addition, our final CCP/EIS, appendix A, “Land Protection Plan,” primarily targets wetlands and adjacent areas for fee acquisition. The fee ownership of wetlands, sensitive areas, and adjacent uplands is more likely to give us the most flexibility in managing them. We feel that their sensitive nature makes having a higher level of management control desirable. Our proposed easement areas are concentrated at higher elevations, in areas of upland forest (see appendix A and map A-1 for our proposed areas of fee and easement acquisition and the rationale behind them).

We expect the acreage of the upland forest we own in fee title to be sufficient to warrant hiring a forester, either as a contractor or, when funding permits, as a permanent staff member. That will help us develop a comprehensive

forest habitat management plan that meets our specific goals and objectives for wildlife management, and helps ensure the continuity of our forest management. Because our goals are likely to differ from those of adjacent landowners, we feel that hiring a refuge forester will help ensure that wildlife habitat management remains our primary focus. From our perspective on the refuge, forest management is “concentrating on wildlife,” and we will expect the refuge forester to work closely with staff biologists in accomplishing specific objectives for wildlife.

Generally, we would structure refuge easements to protect forest land and allow habitat management. Again, the landowners will determine what easement rights they are willing to sell. For details on structuring easements, see appendix A, “Land Protection Plan,” in the final CCP/EIS.

Comment: One commenter suggested that, instead of trying to acquire land, we place more emphasis on supporting and collaborating in state and local protection.

Response: We fully support the partnership approach to land conservation, as in the one for establishing the refuge. In the final CCP/EIS, chapter 1, maps 1–1 and 1–2, and in appendix A, “Land Protection Plan,” we include other conservation in the Upper Androscoggin River watershed and the approximately 170-thousand-acre study area adjacent to the refuge. To develop a landscape-level conservation perspective in developing our proposal, we reviewed conservation efforts adjacent to that study area adjacent to the refuge. We applied a partnership philosophy on preserving access, managing timber, conserving land, and managing wildlife in the Upper Androscoggin River valley and the Connecticut River headwaters. By reviewing past successes, such as the Connecticut Lakes headwaters project, the Pingree conservation easement, the Errol town forest, and the conservation-minded management of the Second College Grant by Dartmouth College, as well as ongoing initiatives by the two states through the forest legacy program, we designed our proposal to accomplish our stated goals and objectives efficiently and complement those of others.

On that landscape, expanding the refuge expands the federal role in wildlife management. Other partners are playing other roles. Various ownerships are conserving various traditional uses and access. We are facilitating hunting, fishing, wildlife observation and photography, and environmental education and interpretation on the refuge. Additional uses are being facilitated on other lands. Those efforts are conserving all aspects of access in the northern forest on a mosaic of land ownership in the Upper Androscoggin watershed. We continue to adhere to that spirit of cooperation, and will facilitate state and local conservation when and wherever possible. We reiterate our commitment to cooperative land protection in appendix A, “Land Protection Plan,” in its section on “Protection Options.”

Comment: One commenter proposed that we restrict refuge land acquisition exclusively to the wetlands associated with the current refuge. Others suggested that we acquire fee ownership of wetlands and rare vegetation communities, and acquire easements in upland forest so that timber harvesting could continue.

Response: As we fill in the present refuge acquisition boundary, our highest priority for fee acquisition will become the wetlands and “water bodies of high value” we identify in appendix A, “Land Protection Plan.” The present refuge is not an island; the continued health of its fish and wildlife populations and vegetation communities depends on the health of the surrounding ecosystem. The lands we target for fee acquisition in the proposed expansion area are primarily wetlands in the Umbagog Lake watershed that could have direct effects on the health and water quality of its aquatic systems. We also targeted for fee acquisition the upland areas adjacent to those wetlands, because land use practices on those uplands can dramatically affect the water quality and integrity of that wetland ecosystem. We also identified for fee acquisition the uplands that are important for trust species of special concern, and areas that provide connectivity with adjacent conserved land or are at high risk of habitat loss. Our owning those uplands in fee title is likely to give us the most control over management practices. We concentrated our proposed easements in areas of upland forest, as the commenter suggested (see appendix A and map A–1 for the areas and rationale behind our proposed fee or easement acquisition).

Comment: Another commenter urged us to seek the ownership or management of U.S. Navy training lands located in Reddington, Maine.

Response: The Navy SERE training facility at Reddington, Maine, is not on the BRAC list (Base Closure and Realignment Act), and our considering it falls outside the scope of the final CCP/EIS.

Comment: Several commenters felt it was inappropriate to use “wildlife dollars to purchase land for motorized use,” and supported land acquisition for non-motorized activities only. They urged us to facilitate non-motorized recreation and provide more opportunities for back-country camping. Others advocated limiting back-country camping. One urged us to decommission as many roads on the refuge as possible.

Response: Although designated wilderness areas generally restrict motorized activities, the refuge lacks wilderness status (see final CCP/EIS appendix D, “Wilderness Review”). The mission of the Service focuses on the conservation of wildlife and wildlife habitat, although we facilitate priority public uses, when they are compatible. Therefore, we do not seek to acquire land purely for recreational uses, either motorized or non-motorized (including camping). Instead, we seek to acquire land that fulfills our management purposes. We have mapped certain roads as designated routes of travel that will be open for motorized vehicles (final CCP/EIS, chapter 2, map 2–8), and have designated additional trails for snowmobile use (final CCP/EIS, chapter 2, map 2–9). We will allow the use of motorized vehicles only on those designated routes, and will close smaller roads and skid trails to vehicular traffic (please refer to our responses in this document under “Roads,” “Access,” and “Snowmobiling”).

The refuge is closed to ATVs and other off-road vehicles (see our response under “Off-Road Vehicle Use”). We feel that those who prefer non-motorized travel will find satisfactory the areas of the refuge that are inaccessible to motorized vehicles. In the final CCP/EIS, alternative B, goal 4, we describe additional interpretive or nature trails and other routes that we have designated for non-motorized use. We designated some of them for non-motorized use from spring through fall, but allow snowmobiles on them in the winter. Map 2–9 in chapter 2 of the final CCP/EIS shows their proposed locations. Back-country camping is available on the refuge at a number of designated sites administered by the New Hampshire Division of Parks and Recreation. Those campsites all pre-date the establishment of the refuge. We feel that the opportunities now available for back-country camping on the refuge are adequate, particularly when combined with the opportunities available elsewhere, such as the White Mountain National Forest. We are not proposing any additional designated campsites in the proposed expansion area.

Comment: One individual questioned the market value of land indicated in the draft CCP/EIS, appendix A, “Land Protection Plan.”

Response: We based our estimate of land market values in the CCP on the values of wetland and previously harvested upland forest. That was only an estimate. If we are fortunate enough to purchase land from willing sellers, we will determine its actual market value in a detailed appraisal to professional and federal standards.

5.2 Buildings and Facilities

(Letter ID#: 3, 7, 9, 35, 50, 56, 59, 60, 63, 64, 70, 72, 73, 75, 85, 86, 87, 88, 89, 90, 97, 101, 102, 107, 110, 111, 112, 130, 135, 142, 147, 149, 151, 153, 164, 165, 168, 169, 172, 174, 257, 283, 292, 315, 318, 323, 330, 340, 341, 343, 360, 364, 379, 385, 441, 451, 454, 455, 470, 483)

Comment: One commenter pointed out that some of our proposed refuge construction and management activities (such as the construction of a new boat launch and forest management) might require state permits, and the final CCP should acknowledge that.

Response: We thank the commenter, and agree that we should obtain all permits pertaining to the refuge that are required by law. That is also Service policy. We have applied for required local and state permits in the past, and will continue to apply for them in the future.

Comment: One commenter urged us to target energy-efficient technologies in purchasing vehicles and constructing or maintaining buildings.

Response: We agree with that suggestion. All new federal buildings are designed to comply with federal energy laws and regulations (cf. 10 CFR 435). Service policy requires that new construction implement the most cost-effective, energy-conserving design that is consistent with resource objectives. Director’s Order No. 144 (2002)

directs us to “reduce our reliance on traditional fuel-based vehicles.” The priorities and schedules governing vehicle replacement are determined at the regional and national level. However, the vehicle we acquired most recently was a hybrid.

Comment: Several commenters felt that we were not properly maintaining or removing old buildings, or cleaning up and properly restoring old building sites on the refuge to their natural state, and felt that was also creating an eyesore. One claimed to have observed equipment, nails, plastic, and other debris at such a site. Some questioned why buildings were being “taken off the tax rolls” and used to house “dignitaries,” staff, and other refuge visitors. The commenters felt that we should not purchase new “camps” before tearing down and cleaning up old ones.

Response: As funding becomes available, we remove the camps we acquire. We have removed 15 camps, and plan to remove another four this year. We will review the sites of camps that we tore down, clean up any debris that remains, and plant trees as needed.

The standard practice throughout the Refuge System is to maintain quarters for Service employees, seasonal employees, interns and volunteers. That provides us with the ability to recruit staff for short periods (temporary, seasonal, project specific, volunteer, or quick-response staff, such as law enforcement). Providing government housing is a very cost-effective tool for managing refuge staffing needs. All full-time Service staff now living in government housing are required to pay rent. The rents are used to maintain the refuge quarters.

After reviewing the Lake Umbagog refuge quarters program, we consider the current level of housing to be sufficient for the need. We maintain four “quarters” buildings: the Stranger house, the Carman house, the Coffin house, and the Costello house. We have already scheduled the Costello house for demolition, but are quartering researchers there for this field season. Thereafter, we will maintain three buildings as quarters.

Comment: Another commenter criticized us for not cleaning up the old dump site at the Day Flat area in Wentworth Location.

Response: In reviewing that site for contaminants before purchasing it, we found it had been closed according to state standards and was not an environmental hazard. Nevertheless, over the past several years, groups from the Youth Conservation Corps have worked at cleaning up small, surface debris at that site. We intend to continue that in the future.

Comment: One commenter felt that the signs marking the refuge boundary along Lakeview and River roads were unsightly.

Response: The signs mark the external boundary of the refuge land we own in fee title. Marking that boundary helps the public understand when they are on the refuge. We designed and placed the signs in accordance with Service policy on the approved design and placement of signs.

Comment: We received comments either supporting or opposing our proposal to relocate the refuge headquarters to the Potter Farm site. The supporters felt that site would provide the necessary space, was more centrally located, would help promote “nature-based tourism,” and was the “best site [for public education] on the lake.” One commenter stated that preserving the Potter Farm would help visitors understand the history of the area. Those who opposed the selection of the Potter Farm site cited a number of reasons, including the excessive cost, the poor condition of the building and foundation, the condition of the Potter Farm road, the need to bring utilities over a long distance, the difficulty of maintaining the long road, and the fact that our present headquarters building is relatively new. Some felt that acquiring additional land would be a better use of refuge dollars than establishing a visitor center at the Potter Farm. Others felt that restoring the Potter Farm site to natural conditions was more in keeping with the refuge mission. Several commenters felt that the decision to relocate the refuge headquarters to the Potter Farm was made to benefit the staff, rather than the public or wildlife.

Response: We thank the commenters who supported the move. A site selection committee, which included representatives from Maine and New Hampshire, the Town of Errol, the refuge, and our regional office, evaluated several potential sites. Oak Point Associates, a consulting firm, also reviewed them, and concluded that the Potter

Farm site was the most suitable for our criteria. (For those criteria, refer to “New Refuge Headquarters and Visitor Contact Facility” in chapter 2 of the final CCP/EIS, under “Actions Common to All of the Alternatives.”)

To accomplish the public use goals and objectives in the final CCP/EIS, we concluded that the Potter Farm site was the best location to develop those facilities. In the selection process, we considered the costs associated with the construction and maintenance of the roads and facilities. The remote character of the Potter Farm, its access from both water and land, and the variety of habitats in the area were key factors in our decision. We will conduct a cost-benefit analysis before deciding whether to restore or replace the structure. We included the site of our present headquarters with the other sites we evaluated in the selection process, but rejected it due to its limitations. Please be aware that the funding for land acquisition comes from separate, dedicated sources; we cannot use it for construction or maintenance. The benefits of the move for refuge staff were not one of the criteria in the site evaluation process.

Comment: One commenter asked that we consider the economic impact on the local community of siting a new refuge headquarters, and consider alternatives like siting it on State of New Hampshire land or at the marina at the south end of the lake. Others proposed siting it in the Town of Errol, as part of our cooperation with the town. One commenter felt that locating the visitor center in areas already receiving public use would result in fewer disturbances.

Response: Our primary purpose in moving the headquarters and visitor center to the Potter Farm site was to accomplish our public use goals and objectives (see previous responses). Tying people to nature is best accomplished through hands-on experience requiring on-site trails and facilities. We determined that the Potter Farm, a previously developed site, possessed the access and quality of environment necessary to accomplish those goals and objectives. We have reviewed the suggestions to consider state-owned land or the privately owned marina at the south end of the lake, but uphold our decision for the Potter Farm.

Comment: One commenter felt that unresolved issues of land ownership and access might impede our plans to site a visitor facility at the Potter Farm.

Response: We are unaware of any access issue affecting the Potter Farm, but will consider and address all such concerns before we develop those facilities.

Comment: One commenter felt that the new boat launch on the Magalloway River had been paved unnecessarily, and had been overbuilt if it was only going to be used as a car-top boat launch.

Response: The boat launch was built to the established standards for the type and level of use we predict. Because we identified that project as a refuge operating need before starting the CCP process, it falls outside the scope of the final CCP/EIS.

Comment: Several commenters felt that the Magalloway River trail was too costly, ill-conceived, does not receive much use, and presents few opportunities to view wildlife.

Response: The Improvement Act requires that we facilitate wildlife-dependent public uses, such as wildlife observation and interpretation, when they are compatible with refuge purposes. The siting of an interpretative trail is always a balancing act between facilitating access to wildlife and sensitive plant communities and minimizing the disturbance the trail or its use might cause. Much of the Magalloway River trail uses a pre-existing roadbed, thus minimizing its cost and the new disturbance of ground-breaking. The trail traverses several different plant communities, including a black spruce-red spruce forest and a red maple floodplain forest. The black spruce forest harbors boreal bird species that are uncommon elsewhere in New Hampshire, such as the gray jay and the occasional spruce grouse. The trail also provides opportunities to view moose, waterfowl, and vernal pool amphibians. We intend to install interpretive signs along the trail to provide information about the wildlife and plant communities of the area. Although we have observed the light-to-moderate use of the trail, we expect that use to increase once we have installed those signs.

Comment: Some local residents who live near the Potter Farm were concerned that constructing a new visitor center would result in increases in noise and boat and vehicular traffic, and disturb residents and wildlife alike.

One commenter felt that this went against the spirit in which its owners originally transferred the Potter Farm to the Service.

Response: Although we expect some increase in boat and vehicular traffic as well as the disturbance of wildlife and local residents, we believe we will be able to control and manage it better when the headquarters is co-located with our proposed interpretive trails and facilities. In the past, we have discouraged the use of the Potter Farm by gating its access road except for special events. We have received many complaints about gating parts of the refuge while saying that the refuge is open to public use unless specifically closed. We have always intended to open it to public use, and believe that our doing so conforms to the spirit in which the Potter Farm originally was transferred to the Service.

Comment: Several commenters expressed their opposition to a proposed boat ramp on Sturtevant Pond. The opponents were concerned about the disturbance of wildlife (loons, herons, waterfowl, etc.), water pollution, the introduction of aquatic invasive plants, and the disturbance of the peace and quiet of lake residents by increased motorboat traffic. One commenter expressed concerns about the water levels of the pond.

Response: After reviewing those concerns, we have reconsidered our proposal to provide a developed boat launch at Sturtevant Pond, and have removed that proposal from the final CCP/EIS. We would need to address water level management as part of our collaborative process with the Errol Dam FERC licensee.

Comment: Other commenters opposed the development of new boat launches at the B and C ponds. Their concerns centered on protecting the lake, preventing the introduction of bass, and spoiling the beauty and remoteness of the lakes. One commenter suggested installing a dam at the outlet of B Pond to prevent bass getting into it from Umbagog Lake.

Response: We do not own the B Pond. Because of the concerns expressed, we have reconsidered our original proposal and, should we acquire the pond, plan to leave its access as “primitive” access only. For reasons of safety and resource protection, we still propose developing a small parking area away from the pond, but have removed our proposal to improve its car-top boat launch from alternatives B and C in the final CCP/EIS. We cooperate with both the states of Maine and New Hampshire on fisheries issues, and will continue to do so if we acquire land around the pond. That will include maintaining and improving the fish barrier dam on B Brook. We do not propose any changes in public access to C Pond in the final CCP/EIS.

Comment: Several commenters opposed closing the boat launch at refuge headquarters. One proposed improving it. Their reasons included its convenience, its use by visitors, and the lack of alternative sites nearby.

Response: We have reconsidered our decision, and plan to keep that boat launch open to the public. We have removed the proposal to close it from both alternatives B and C in the final CCP/EIS. However, to address concerns about safety, we will modify the office site by adding signs to warn oncoming traffic and increasing the field of vision for trailering boats.

Comment: Some individuals advocated developing more launch sites, including one in Upton, for canoes and kayaks. Others opposed facilitating kayaking, and expressed concerns that the lack of rest room facilities along the river for kayakers and canoeists would result in human waste along the banks.

Response: To address some of those concerns, we have put in a new car-top boat launch with a public restroom north of the refuge headquarters on the Magalloway River. That facility is available for use, and should provide convenient intermediate access and a stopping point for canoeists and kayakers using the river. The restroom available at that site and the one at refuge headquarters should help reduce the human waste along the river. Our future plans also include putting a restroom facility at Steamer Diamond. We feel that, elsewhere on the refuge, the canoe/kayak access and the rest areas are adequate for the current demand.

Comment: One commenter suggested we build a wildlife observation platform where Eames Road crosses the outlet of Sweat Meadows. Another wanted us to build more parking areas for hunters as we acquire new land.

Response: The final CCP/EIS includes the proposed siting of an observation platform close to the intersection of Eames road and Sweat Meadows, as well as plans for additional parking to facilitate hunting. We thank the commenters for their support of those proposals.

Comment: Several commenters questioned our motives for moving the Stranger House farther away from the road, and wanted more information on the cost and siting of kiosks and pull-outs.

Response: We decided to move the Stranger House before the CCP process started. Therefore, it lies outside the scope of this document. Please contact the refuge manager directly for additional information.

Comment: One commenter posited that using local contractors would be more cost-effective than acquiring heavy equipment.

Response: We contract with local businesses to complete projects on the refuge, but also have found it cost-effective to do some projects with refuge equipment. We will continue to evaluate the costs and benefits of contracting out the various construction and maintenance projects at the refuge.

Comment: One commenter objected to the gated roads on the refuge that allow camp owners access, but deny it to the public.

Response: We address that issue previously in this section in responding to public comments about developing public use facilities at the Potter Farm. We plan to maintain a gate on Eames Road, because we propose it for pedestrian use only (see final CCP/EIS chapter 2, alternative B, goal 4). The camp owners at the end of the road have a right-of-way that allows vehicular access. The gate on Pond Brook Road is a private gate, and is not on refuge property.

5.3 Staffing and Funding

(Letter ID#: 37, 50, 107, 135, 153, 164, 610)

Comment: Many comments expressed concerns about current budget cuts and their effect on staffing and managing the refuge.

Response: We agree that reduced funding over the past few years has placed the Service in a position where it had to reduce staffing nationwide. That reduction in funding was tied to unforeseen spending on disaster recovery and the wars in Afghanistan and Iraq. We reduced annual funding at the refuge, and reduced its staffing by one position. The levels of funding for fiscal year 2008 markedly improved, allowing us to fund refuges in the Northeast at 75-percent staffing and 25-percent operating levels. Finalizing the CCP will set forth plans to improve staffing, operating efficiency, and services and facilities.

A paragraph on the inside front cover of the draft and the final CCP/EIS explains what a CCP does. It states, “These plans detail program planning levels that are sometimes substantially above current budget allocations and, as such, are primarily for Service strategic planning and program prioritization purposes. The plans do not constitute a commitment for staffing increases, operational and maintenance increases, or funding for future land acquisition.”

Comment: One commenter suggested that we revisit the Refuge Operating Needs proposals (draft CCP/EIS, appendix F, “Refuge Operating Needs (RONS) and Service Asset Maintenance Management Systems (SAMMS),” to reduce our acquisition and maintenance budget.

Response: We appreciate the comment, and assure the commenter that we constantly analyze our budgets and spending to ensure fiscal responsibility and reduce spending whenever possible. The many federal regulations and Service policies on procurement are in place to safeguard the public trust in managing federal budgets. We consider outsourcing and other means of accomplishing tasks in determining the most appropriate way to accomplish them.

Comment: Another commenter attributed the lack of signs to inadequate funding.

Response: We agree that we need to place additional signs around the refuge to welcome and orient visitors. We will be able to place them most effectively after we have completed our visitor services plan, which is a step-down plan we have scheduled for completion within 3 years of final CCP approval.

5.4 Road System

(Letter ID#: 33, 85, 100, 125, 138, 148)

Comment: Comments about the road system relate to access, maintenance, and concerns that budget cuts could affect access in the future.

Response: The final CCP/EIS sets forth our intention to maintain public access on designated routes of travel, primarily to facilitate priority public uses and maintain an infrastructure of roads that will help facilitate habitat management (see maps 2–8 and 2–9 in alternative B in chapter 2 of the final CCP/EIS). The designated routes of travel are mostly primary gravel roads and some secondary gravel roads. Motor vehicles will not be permitted to drive on smaller roads or skid trails.

We intend to maintain the designated roads in a way similar to the way their previous owners maintained them. The refuge staff and private contractors will perform major maintenance periodically, especially before and during logging operations. The rest of the time, only minor maintenance will occur, until the roads are needed again for management purposes. During those periods of maintenance, we will allow the public access at its own risk over the designated roads in their existing conditions.

Comment: One commenter was concerned about trespassing and increasing foot traffic on the Eames Camp Road.

Response: We will place a second gate on the Eames Camp Road, just beyond the proposed overlook of Sweat Meadow, and place signs there to mark the end of the walking trail and discourage people from walking farther along the road. Routine law enforcement patrols will also help orient and educate the public. Please refer to the public use maps 2–8 and 2–9 in alternative B in chapter 2 of the final CCP/EIS.

Comment: Some commenters also expressed their concern that trails in the Mountain Pond area should be limited to existing forestry roads, due to the possible disturbance of sensitive habitat.

Response: In the final CCP/EIS, chapter 2, alternative B, goal 4, (see maps 2–8 and 2–9), we propose trails in the Mountain Pond area along Mountain Pond Road, along the Eames Camp Road as noted above, and along an anglers' trail that leads to Mountain Pond. The trail to Mountain Pond would end where it meets the pond. We are not proposing any other new trails in that area.

5.5 Enforcement

(Letter ID#: 33, 72, 96, 97, 107, 149, 470)

Comment: The comments about law enforcement split regarding increased or decreased levels of enforcement. Some commenters also were concerned about increased public use and its potential to increase littering, illegal camping, and campfires burning out of control.

Response: We appreciate the candor of those comments, but stand behind the levels of law enforcement we describe in final CCP/EIS appendix H, "Staffing Charts." Refuge law enforcement officers handle a wide variety of duties in ensuring public safety, conducting outreach and education, enforcing refuge regulations, and deterring criminal activities. In 2007, we documented 12,212 incidents or offenses on the national wildlife refuges in the Northeast. Those included hunting and fishing violations, drug-related crimes, crimes against persons (including assault, burglary, larceny, arson, and sex offenses), vandalism, wildfire, and timber theft. We also documented 73 searches and rescues, 89 emergency medical responses, and 75 fires in the Northeast Region alone. Service law enforcement officers also serve as essential links between the refuge and the public by providing outreach and information on refuge regulations while orienting visitors to the refuge. We acknowledge the law enforcement program as essential in accomplishing our goals for the biological and public use programs.

5.6 Volunteer and “Friends” Group

(Letter ID#: 90, 108, 362)

Comment: Several commenters mentioned developing a friends group and using volunteers to improve and maintain trails.

Response: We welcome volunteers who want to assist us in any aspect of daily operations on the refuge. We will do our best to match your skills and interests to the needs of the refuge. Nationwide, more than 38,000 volunteers have helped the Service fulfill its mission, by contributing more than 1.4 million hours of labor or service. We are truly grateful to them. The many opportunities to volunteer include jobs ranging from biological surveys to trail work, office work, or building maintenance. Anyone interested in volunteering should contact the deputy refuge manager.

The group “Friends of Umbagog” was established in the mid-1990s but, since then, has lost momentum. We agree that a friends group could develop and enhance activities on the refuge and foster communication between it and the public. Please contact the refuge manager if you are interested in becoming a member of our friends group.

Please do not confuse our friends group with the Umbagog Working Group. The idea behind the Umbagog Working Group is to bring together regulatory agencies and other entities with jurisdiction on Umbagog Lake for the common goal of streamlining and aligning regulations for the lake, an interstate water body.

5.7 Visitor Services

(Letter ID#: 33, 72, 97, 102, 103, 112, 222, 230, 257, 326, 432, 436, 453, 470)

Comment: The comments about visitor services share one sentiment: people want a user-friendly refuge, where the public is made to feel welcome, which includes more visitor services. Those include increased outreach, orientation, education, comfort stations, campsites, hiking trails, wildlife-viewing areas, toilets, and picnic areas.

Response: Our vision for the refuge, which we printed on the inside cover and in chapter 1 of the final CCP/EIS, clearly agrees with those comments. It states, “Visitors of all ages will feel welcome to enjoy the full compliment of priority wildlife-dependent public uses. We will foster their knowledge of and support for conserving northern forest habitats through exceptional outreach and visitor programs. We want all our visitors to return home filled with enthusiasm for promoting and practicing resource stewardship in their own communities.” That expresses our interest in outreach and education and our intent to seek opportunities to facilitate them. In chapter 2 of the final CCP/EIS, goals 4 and 5 in alternative B also discuss our desire to improve visitor services and outreach. Outreach is essential, and hiring a visitor services specialist would assist the refuge in those areas. Our developing refuge visitor services as those goals outline them would also alleviate those concerns.

Comment: One commenter wanted toilets at the designated campsites, especially composting toilets. Others mentioned the need for toilets for boaters at boat launches and elsewhere. Pit toilets are already in place at all designated campsites.

Response: We are cooperating with NH State Parks in the design, installation, and maintenance of composting toilets at those campsites. The new car-top boat launch on the Magalloway River in Wentworth Location has a concrete vault toilet, and the Brown Owl launch at refuge headquarters opens its facilities to the public during regular business hours. We will consider placing toilets at other launches as necessary. No additional plans are in place to provide toilets for boaters.

6.0 Social and Economic Values

6.1 General Management Direction

(Letter ID#: 98, 111, 112, 135, 151, 320, 337)

Comment: Commenters expressed both favorable and unfavorable opinions about the social and economic values we present in the draft CCP/EIS. The favorable comments related to the benefits land conservation provides for tourism and public access. One person wrote that the refuge “puts a green spot on the map and tourists

come,” while others valued saving wild places, which is embedded in the social fabric of the area. The unfavorable comments included concerns over the economic impacts of reduced timber harvesting if the refuge acquires additional land, and the potential restrictions on access.

Response: We agree those values are important, and incorporated them in the final CCP/EIS. We recognize especially the importance of protecting public access, given the current high rate of change in land ownership. Although the final CCP/EIS does not provide every use the public requested, we believe it will secure compatible public access permanently for the future.

In the final CCP/EIS, chapter 2, goal 3, objective 3.1, we clearly state that we will use timber harvesting in managing our upland forest for the benefit of our focal species. Although our objectives might differ from those of the original owners, and the level of harvest on public land might differ, the final CCP/EIS, appendix G, “Economic Analysis,” addresses those issues. The concern surfaced that we did not include timber harvesting on lands we might acquire in this analysis. For the purposes of this CCP/EIS, we assume that the lands we might acquire will lack sufficient stocking volumes to be harvested within its 15-year time frame. For additional information, please see our responses under the sections “Upland Forest Matrix Habitats and Species,” “Appendix A,” and “Appendix C.”

We recognize the social and economic value of public access in the North Country. Significant parts of this document address those concerns. Please refer to our response in the section “Access.” The sections on “Priority Public Uses” and “Other Public Uses” also address them.

Comment: One comment was unfavorable concerning our support of consumptive uses on the refuge: specifically, hunting.

Response: We recognize the economic value of visitors who engage in non-consumptive uses and propose significant improvements in the public use infrastructure. We believe the final CCP/EIS offers sufficient opportunities for both non-consumptive and consumptive use. Please see our public use maps in the final CCP/EIS, chapter 2: alternative A, map 2–5; alternative B, maps 2–8 and 2–9; and, alternative C, map 2–13.

6.2 Local Economy

(Letter ID#: 33, 86, 96, 107, 135, 307, 359, 360)

Comment: Most of these comments focused on the projected levels of increased visitation, continued forest management, and diversification of the economy. They expressed a general concern about the reliability of our economic analysis. One commenter summed it up as, “I am concerned that you have not done adequate research on how the local economy would be impacted by your decision.”

Response: We established an agreement with a USGS professional economist who has a lot of experience in this type of analysis. The model we use, “IMPLAN,” is an industry standard. An expert forest economist from the U.S. Forest Service modified that model, using local timber industry data to better reflect the local economy. We believe that the economic analysis in the final CCP/EIS, appendix G, “Economic Analysis,” accurately represents the local economy.

Comment: Others were concerned that local businesses and the refuge would be unable to handle the projected increase in visitors.

Response: Appendix G projects a modest increase in visitors. We based part of that increase on our acquiring lands that are now privately owned, where recreation is already taking place. If we acquire them, then that recreation would accrue to the refuge. In addition, we believe that the number of private commercial businesses in the local communities outside the proposed refuge expansion area is sufficient to accommodate that projected increase.

Comment: Others felt the refuge would help support a diverse, healthy local economy.

Response: We agree with that view and, in developing the proposed refuge expansion boundary, we considered the need to provide areas sufficient for the local communities to grow and develop strong economies.

Comment: Another concern arose that our economic analysis did not provide a multiplier for timber harvesting and production, thereby undervaluing the forest industry compared to recreation.

Response: The IMPLAN model used in appendix G includes a multiplier for all economic sectors, including forest harvest and production for the lands we proposed to harvest over the next 15 years. We did not estimate harvesting or apply a multiplier to lands within the proposed expansion area, because we do not know when or if we will acquire them. Furthermore, we assumed their owners would harvest them prior to our acquisition, thus providing us with few or no harvesting opportunities within the 15-year time frame of the plan. We proposed guidelines for forest harvest management in chapter 2 of the final CCP/EIS alternative B, goal 3, and in its appendix K, “Forest Management Guidelines.” If we are fortunate enough to acquire sufficiently stocked land from willing sellers, we will apply those guidelines on that land.

Comment: Another concern related to the protection of individual parcels of working forest.

Response: We feel this plan protects individual parcels of working forest. As in our response in this document under “Social and Economic Values,” our habitat management goal would be to maintain large parcels of working forest. The only difference is that our goals are oriented toward wildlife, not timber production.

Comment: One commenter cited the importance of non-consumptive uses and their value to the economy.

Response: We recognize the economic value of non-consumptive uses, and propose significant improvements to their infrastructure in this plan. We believe it provides sufficient opportunities for both non-consumptive and consumptive uses. Please see the discussion in chapter 2 of the final CCP/EIS, alternative B, and maps 2–8 and 2–9.

6.2a Tourism

(Letter ID#: 10, 32, 47, 50)

Comment: Most comments reflect the importance of tourism in the area. Some would prefer little change in the present level of tourism, while others feel that the new facilities we propose in the draft CCP/EIS, alternative B, would enhance it.

Response: We recognize the importance of tourism in the local economy, and appreciate those comments.

Comment: Others apparently were confused by the predictions about recreation we based on land acquisition in alternatives B and C of the draft CCP/EIS.

Response: Although we feel that tourism is increasing in the area, and will increase after we establish the visitor’s center and trails we propose in the final CCP/EIS, chapter 2, “Actions Common to Alternatives B and C Only,” we based most of those figures on acreage. For example, if the refuge has 20,000 acres now, and we buy an additional 20,000 acres from willing sellers, the number of visits for hunting white-tailed deer might double. That does not mean that the deer hunters visiting the area have increased by 100 percent; it means that the hunters who typically hunted that property before are now hunting on refuge land. Those numbers will increase, but the overall density of the use will not; therefore, additional facilities to handle the increase are unnecessary.

6.2.b Property Tax

(Letter ID#: 35, 48, 85, 90, 107, 110, 112, 130, 135, 149, 164, 283, 307, 315, 343, 364)

Comment: Several commenters were concerned about the impacts on the tax base when the government buys property. When we purchase property from willing sellers, it is removed from the tax rolls, creating the potential for an increased tax burden on the remaining residents. Some individuals also were concerned that the market value of the remaining properties would increase, causing increases in property taxes. Some were concerned about the level of funding, the maximum level of refuge revenue sharing payments, and its stability or predictability. They also wanted to know how property tax revenues compare to refuge revenue sharing payments.

Response: We acknowledge that our purchasing property removes it from the tax rolls of each town. In the final CCP/EIS, appendix G, “Economic Analysis,” analyzes the effects on each town and compares its loss in

tax revenue with its revenue sharing payments. The last column in table 12 in appendix G of the final CCP/EIS shows the net change in taxes collected compared to the FY 2005 revenue sharing payments, which were funded at 41 percent for each town that year. We used that 41-percent figure not only because the towns received it in 2005, but also because it is the lowest percent Congress has funded since 1977 (table O-1). The 31-year average of revenue sharing payments is 68.08 percent, and the average payment for the last 10 years is 51.88 percent.

Table O-1. Revenue sharing by fiscal year

Fiscal Year	Revenue Sharing Paid (%)
1977	73.7
1978	73.9
1979	52.3
1980	75.9
1981	100.0
1982	87.6
1983	90.6
1984	77.1
1985	74.1
1986	64.4
1987	60.0
1988	59.0
1989	71.1
1990	77.9
1991	93.6
1992	89.6
1993	81.7
1994	77.9
1995	77.1
1996	65.7
1997	72.5
1998	66.2
1999	62.2
2000	57.9
2001	50.9
2002	51.9
2003	48.4
2004	46.6
2005	41.0
2006	46.6
2007	43.1

The Refuge Revenue Sharing Act of June 15, 1935, originally paid local municipalities 25 percent of the receipts the neighboring refuge collected from the sale of various products or privileges. However, if that refuge generated no revenue, the local municipalities received no payment. Congress amended the Act in 1964 to provide a payment of 25 percent of the net receipts, or three-quarters of 1 percent of the adjusted purchase price of refuge land, whichever was greater. By 1976, refuge receipts were insufficient to make the payments, and Congress reduced them accordingly. It amended the Act again in 1978 to include the following.

1. Congress can appropriate funds to make up any shortfall in the revenue funding.
2. All lands the Service administers qualify for revenue sharing.
3. Local municipalities can use the payments for any purpose (not just for schools and roads).

We reappraise refuge lands at least once every 5 years to ensure that those payments are based on market value. More information on refuge revenue sharing can be found online at www.fws.gov/realty/RRS.html.

Even at the 41-percent level of refuge revenue payments, towns in New Hampshire will receive more than they would have received in tax revenues under the state’s Current Use program. Even at the lowest-ever level of revenue sharing, Errol would gain a net \$3,657, Cambridge would gain a net \$10,988, and Wentworth Location would gain a net \$1,434 under our preferred alternative. They will also continue to receive taxes on any forest harvest from lands under refuge habitat management.

However, those net gains in revenue did not hold true for Upton and Magalloway Plantation in Maine. We attempted to ease the tax burden on those communities by modifying our land protection plan between the draft and the final CCP/EIS, increasing the percentage of our proposed conservation easements and reducing the percentage of fee title acquisition in those towns. We feel that, in their generally higher elevation forests, we can accomplish with easements most of the goals and objectives in chapter 2, alternative B of the final CCP/EIS. Please refer to appendix A, “Land Protection Plan,” in the final CCP/EIS for its description of our expansion proposal and its graphic presenting fee or easement areas. That changes the percentage for the entire expansion proposal from 65-percent fee simple acquisition and 35-percent conservation easement to 56-percent fee simple acquisition and 44-percent conservation easement. Please refer also to the final CCP/EIS appendix G and its table G–12 for our edits, which more accurately reflect the change in fee percentages versus easement percentages, tax revenues, and other revenues such as reimbursement to the towns under the state Tree Growth Program.

We acknowledge that our original analysis of economic impacts did not address the loss of state reimbursement from the Tree Growth Program to towns in Maine. Accounting for that reimbursement, figured for 2007, and the new figures at the revenue sharing level of 41 percent for fee and easement acquisition, Upton would gain \$2,310 and Magalloway Plantation would lose \$144. Please keep in mind, the state changed its reimbursement formulas between our publications of the draft and the final CCP/EIS (Lucas pers. comm. April 2008). Table O-2 below shows the change in the amount the state reimburses to the towns under the new formula, compared with the reimbursement last year.

Table O–2. State of Maine reimbursement to towns

Reimbursement	Magalloway Plantation	Upton
2007	\$23,900	\$25,000
2008	\$19,159	\$14,488
Net Change	-\$4,741	-\$10,572

Comparing those new reimbursement figures with the 2007 refuge revenue sharing payment, both towns will lose revenue if we were to acquire land. The following tables (table O-3, O-4, and O-5) present that change in reimbursement from the state and in the taxes Upton and Magalloway Plantation collect, based on an assessed value of \$9.00 per \$1,000.

Table O–3. Net change in revenue collected by towns vs. refuge revenue sharing payments at 41 percent

Draft and final by town	Upton draft CCP/EIS	Upton final CCP/EIS	Magalloway draft CCP/EIS	Magalloway final CCP/EIS
Acres in fee; acres in easement	11,021 ac; 5,153 ac	7,866 ac; 7,446 ac	4,911 ac; 3,058 ac	3,774 ac; 4,195 ac
Loss of tax revenue	-\$9,919	-\$7,079	-\$5,135	-\$3,949
Loss of state reimbursement	-\$14,488	-\$10,088	-\$6,135	-\$4,859
Refuge revenue sharing 41%	+\$16,945	+\$12,094	+\$7,551	+\$5,803
Net change	-\$7,462	-\$5,073	-\$3,719	-\$3,005

Table O– 4. Net change in revenue collected by towns vs. refuge revenue sharing at 51.88 percent (10-year avg.)

Draft and final by town	Upton draft CCP/EIS	Upton final CCP/EIS	Magalloway draft CCP/EIS	Magalloway final CCP/EIS
Acres in fee; acres in easement	11,021 ac; 5,153 ac	7,866 ac; 7,446 ac	4,911 ac; 3,058 ac	3,774 ac; 4,195 ac
Loss of tax revenue	-\$9,919	-\$7,079	-\$5,135	-\$3,949
Loss of state reimbursement	-\$14,088	-\$10,088	-\$6,135	-\$4,859
Refuge revenue sharing 51.88% (last 10-yrs' average)	+\$21,441	+\$15,303	+\$9,554	+\$7,342
Net change	-\$2,966	-\$1,864	-\$1,716	-\$1,466

Table O–5. Net change in revenues collected by towns vs. refuge revenue sharing at 100 percent

Draft and final by town	Upton draft CCP/EIS	Upton final CCP/EIS	Magalloway draft CCP/EIS	Magalloway final CCP/EIS
Acres in fee; acres in easement	11,021 ac; 5,153 ac	7,866 ac; 7,446 ac	4,911 ac; 3,058 ac	3,774 ac; 4,195 ac
Loss of tax revenue	-\$9,919	-\$7,079	-\$5,135	-\$3,949
Loss of state reimbursement	-\$14,488	-\$10,088	-\$6,135	-\$4,859
Refuge revenue sharing 100%	+\$41,329	+\$29,497	+\$18,416	+14,152
Net change	+\$16,922	+\$12,330	+\$7,146	+\$5,344

In response to that concern, we have included only a comparison of tax revenues with refuge revenue sharing payments. The actual economic impact of refuge land acquisition is more complex. For example, when we retain land as habitat, it reduces the need for the services each town provides and increases the revenue to local businesses from visitor, staff and refuge purchases. Those effects further mitigate the economic impacts on each town. We also believe that the towns around the refuge will continue to develop, further increasing their tax base. For a more detailed description, please refer to the final CCP/EIS appendix G, "Economic Analysis."

We will neither re-evaluate the basis for establishing the refuge in this final CCP/EIS, nor analyze the economic impacts of acquiring land within the current, approved refuge boundary. We recognize that our acquiring that land also affects the values of the privately owned properties that remain. Nevertheless, our buying it supports the goals and objectives for which the refuge was established, and we intend to continue purchasing properties from willing sellers as opportunities arise and funding allows. In the expansion area of our preferred alternative, we purposely target undeveloped lands. We considered the need for community development, and avoided areas where that development would most likely occur. Please refer to the final CCP/EIS appendix A, "Land Protection Plan," for parcel maps showing those areas.

Comment: We received one comment expressing the hope that we would spread out refuge land acquisition over time to avoid rapid changes in local property taxes.

Response: We understand that comment, and believe that land acquisition will occur over many years. Although the proposed expansion of the refuge shows its desired future condition, we would like to remind our readers that we work only with willing sellers, and only as funding becomes available.

Comment: We received a few comments asking that the refuge share services and resources to balance the removal of taxable properties as the refuge boundary expands.

Response: Although we understand the needs of our neighboring communities, and will work with them more closely, we would be able to offer only minimal assistance. When we purchase properties to restore or maintain them as habitat, it reduces the need for many services the towns provide. However, we also offer cooperative programs that benefit communities, such as the small grants program and the Wildland-Urban Interface programs of our regional fire program.

Comment: Some comments favored conservation easements over the purchase of land in full fee title, because the land under easement would remain on the tax rolls. They further state, "[we] believe that the opportunity to permanently protect these lands as economic assets presents an opportunity we cannot afford to lose."

Response: We agree that an easement can be a powerful tool in achieving many of the goals and objectives in the CCP while leaving the land in private ownership. We have increased the percentage of easements in our preferred alternative from 35 percent in the draft CCP/EIS to 44 percent in the final plan. Please refer to our discussion in the response to the first comment in this section.

Comment: One comment pointed out an error in our economic impact analysis: it neglected to account for lost revenues from reduced acreage in "Tree Growth" in Maine towns.

Response: We acknowledge that our original analysis of economic impacts did not address the loss of state reimbursement from the Tree Growth program to towns in Maine. Please refer to the new tables and our edits in the final CCP/EIS, appendix G, "Economic Analysis." Those tables present the change in reimbursement from the state and the valuation of taxes each town collects, based on a tax rate of \$9.00 per \$1,000 assessed value.

Comment: Another concern was the Service policy on reassessing property we used in arriving at property values and subsequent refuge revenue sharing payments to the towns. Commenters asked whether the Service was required to reassess the properties at fair market value, and what safeguards are in place to prevent a reduction in those values.

Response: The assessments on Service-administered areas will change as the real estate market changes, just as the assessments on private lands change. The Refuge Revenue Sharing Act requires us to determine the market value of those areas at least once every 5 years. Our appraisals must satisfy the requirements of the Uniform Standards of Professional Appraisal Practice and the Uniform Appraisal Standards for Federal Land Acquisition. In addition, a government-approved review appraiser must review our appraisals to ensure that they meet those standards. That system allows several stages of review to ensure that the appraisal of each property accurately represents its market value.

When we add land to the refuge, we add the value of its acquisition cost to the property value of all refuge lands in the town. We use that value to determine the refuge revenue sharing payment until the next 5-year round of appraisals.

6.3 Social Values

(Letter ID#: 10, 582, 791)

Comment: Some people commented on the significant bond between the local communities and the land, and how the long history of that bond affects the social fabric of those communities. The former presence of author Louise Dickinson Rich in the area is also of historical significance. One individual wrote, “The solution to better stewardship lies in education and administration and enforcement of our current laws.... What ultimately occurs is that you take recreational land away from the average person...and make it a playground for the more affluent.” Another said, “We have an opportunity to arrest the rapid encroachment of humans on every piece of available land.”

Response: We are sympathetic to those comments, and recognize the long-standing connection of the local communities to the land. Although our staff has not lived there as long as many residents have, we appreciate that connection and, indeed, feel it too.

In this context, this quotation of Anthony J. D’Angelo seems appropriate: “Become a student of change. It is the only thing that will remain constant.” The Umbagog Lake region is subject to change. Paper companies have divested their lands to smaller timber owners, who subdivided the land again and sold the parcels to other groups. Timber markets are in constant flux, responding to the ever-changing demands for products from saw timber to pulp to biomass. Waterfront properties and others with high residential values are being subdivided for house lots. The potential is real for private ownership to exclude the public use of those properties. We believe that public ownership of the land can maintain best the tie between it and the people. By participating in refuge planning, the people are guaranteed a say in how we manage it.

We have a strong interest in preserving the historical legacy of Louise Dickinson Rich and the rich local culture of the area, including other figures like Chief Mettalak and Molly Molasses. The refuge visitor center will include exhibits on local history, and will interpret them.

We also agree that education plays a major role in promoting stewardship of the land and environment. We stand by our decision to acquire more land to provide habitat for focal wildlife species.

7.0 Air Quality

(Letter ID#: 112)

Comment: Several commenters expressed their support for our land protection plan because they felt that it might aid the fight against global warming. One emphasized the importance of forests as “carbon sinks” and the value of forest products in terms of energy from biomass.

Response: We appreciate that support. Although we have not analyzed the likely carbon impact, we agree that retaining more of the landscape in a generally forested condition, in combination with our proposed forest

management, will likely enhance carbon sequestration. In the final CCP/EIS, we discuss climate change in chapter 1 under “Issues, Concerns, and Opportunities”; in chapter 2, under “Actions Common to all Alternatives”; and in chapter 4, under “Cumulative Effects.”

Comment: Some commenters opposed motorboat, snowmobile, or ORV use due to their greenhouse gas emissions.

Response: ORVs are not permitted on the refuge. We recognize that the emissions from motor vehicles, motorboats and snowmobiles contribute to greenhouse gases (see the final CCP/EIS, chapter 1, in “Issues, Concerns, and Opportunities”). Also, for discussions of the refuge and climate change, please refer to “Adaptive Management” under “Actions Common to All of the Alternatives” in chapter 2, and “Cumulative Effects” in chapter 4.

8.0 Hydrology and Water Quality

No specific comments received

9.0 Soils

No specific comments received

10.0 Open Water and Wetland Habitat & Species

10.1 General Management Direction

(Letter ID: 108, 656, 698)

Comment: One commenter stated that wetlands are being lost at a high rate on the East Coast.

Response: We recognize that, and it is one of the reasons we have focused our proposed land acquisition and management priorities on significant wetlands and the areas around them. Keeping our wetland systems as healthy as possible will help keep them resilient in the face of climate change and other stressors. See also our response in this document under “Fish.”

10.2 Open Water

No specific comments received

10.2a Invasive Species

(Letter ID#: 61, 72, 108, 128, 343)

Comment: Several commenters expressed their concern over the introduction of aquatic invasive species (both plants and animals) into the Umbagog watershed by boats, researchers, or other means. They suggested increasing the refuge educational outreach and boat inspections.

Response: The control and prevention of colonization by invasive species is a high priority for the refuge (see in this document “Actions Common to All of the Alternatives”: “Control of Invasive Plant Species”; “Strategies”). We will continue to work with state agencies, the New Hampshire Lakes Association, and the Maine Volunteer Lake Monitoring Program on this issue. The strategies we list in the final CCP/EIS under “Control of Invasive Plant Species” include increasing public outreach and education, increasing boat inspections, and ensuring that refuge equipment is not a source of introduction. We agree with the commenters that increased signage at key locations would help in public outreach on this issue, and have added it more explicitly to our strategies in the plan. To reduce the spread of invasive species and pathogens, the refuge staff responsible for carrying out amphibian surveys cleans and sanitizes boots and sampling equipment between sample sites. Nevertheless, the commenter raises a valid concern about the accidental transportation of invasive species by outside researchers, and we have edited a strategy in that section to address that concern, as well as addressing it in the section “Actions Common to all of the Alternatives”: “Research.”

Comment: One commenter expressed concern that the proposed boat launch at B Pond might facilitate the accidental introduction of non-native smallmouth bass and jeopardize the pond's native brook trout.

Response: We proposed only a car-top boat launch for B Pond. Should we eventually acquire that area, however, we have removed all reference to a proposed improved boat launch at B Pond. Instead, we will enhance safety by providing a small off-road parking area. We will continue to cooperate in state efforts to maintain and protect the brook trout fishery in the Umbagog area, including B Pond (see our strategies in the final CCP/EIS, chapter 2, alternative B, goal 1, objective 1.5 "Open Water and Submerged Aquatic Vegetation," and the strategies in goal 4, objective 4.2, "Fishing"). Those also include helping to maintain and improve the fish control structure on B Brook.

10.3 Wetland Habitats (Fen & Flooded Meadow, Boreal Fen & Bog, Northern White Cedar Swamp; Scrub-Shrub Wetland)

(Letter ID# 100)

Comment: One commenter said that a songbird species, such as the swamp sparrow, common yellowthroat, or others, would be a more appropriate focal species than the Canada warbler in shrub-scrub habitats, because Canada warblers do not use that habitat as frequently in the East as they do in the West.

Response: We acknowledge that Canada warblers use shrub-scrub habitat less in this area, that our population estimates based on shrub-scrub acreage might be over-estimates, and acknowledge that habitat difference in our plan. However, we based our population estimates on upland mixed and hardwood forest acreages, not shrub-scrub acreages. Our shrub-scrub habitat type is primarily an alder type. We intend to carry out Canada warbler management in our woodcock management zones (both upland and shrub-scrub areas), because we feel that managing for those two high-priority species in Bird Conservation Region 14 is compatible. We disagree on using swamp sparrows, common yellowthroat, etc., as our focal species. We define focal species as federal trust species for whose habitat requirements we intend to manage. We used BCR and other conservation plans to guide our choice of focal species. Those represent suites of species with similar habitat requirements. Focal species might or might not be the best species to monitor in different habitats. We agree that monitoring swamp sparrows and others is probably a good idea, and intend to do so, but the BCR and other plans have not identified them as priority species for management.

Comment: One commenter suggested that we should make emergent marsh and aquatic bed habitats a high priority on the refuge, with the pied-billed grebe, marsh wren, and a fish species as focal species for those types of habitat.

Response: The "fen and flooded meadow" habitat type on the refuge (final CCP/EIS chapter 2, alternative B, goal 1, objective 1.1), encompasses emergent marsh, and objective 1.5, "Open Water," includes aquatic bed habitat. We will clarify that by changing the name of that type to "Open Water and Submerged Aquatic Vegetation." Also, in chapter 2, alternative B, "Introduction," we state, "in keeping with the original purposes for which the refuge was established, the wetlands objectives under goal 1 [which includes fen and flooded meadow and open water habitats] are our highest priority biological objectives to implement." Although our focal management species for the fen and flooded meadow habitat include waterfowl and common loons, our ongoing surveys of marsh birds will continue to monitor other species closely tied to emergent marsh, such as the pied-billed grebe. We also have identified brook trout as a focal species under our open water habitat type.

10.4 Fish and Wildlife Species

10.4.a Common Loon

(Letter ID#: 16, 73, 100, 118, 200, 584, 655, 735, 815, 830, 832, 848, 869)

Comment: Commenters were concerned about the population levels of common loons at Umbagog Lake. The comments ranged from the perception that the loons take care of themselves to concern over the decline in their numbers at Umbagog Lake and the need to address that decline. Others noted the increasing eagle population, and wondered about potential negative interactions between those species.

Response: We are also concerned about the decline in the loon population, and are undertaking several studies to investigate the factors that might influence loon breeding in the area. Some of those include documenting the interactions between bald eagles and loons. Common loons are being used as the indicator species to monitor the effects of the current water level management scheme during the wildlife breeding season.

Comment: One commenter suggested that the refuge goal of 18 pairs of nesting loons might be too high, especially considering the three active eagle nests. Another commenter pointed out that the goal of 18 pairs is four pairs higher than the historical average, and further suggested that territorial pairs would be a better indicator, or better used as an additional indicator, because that would be a “more accurate and representative metric to monitor the health and sustainability of loon populations.”

Response: We have reconsidered our position, and have modified the final CCP/EIS, chapter 2, alternative B, goal 1, objective 1.6 to target 14 pairs. Data is now collected, and will continue to be collected, on the number of territorial pairs. We also note the comment about using territorial pairs, but respectfully disagree, due to the difficulty of determining territorial pairs that fail early in the nesting season. Monitoring nesting success provides the refuge with a comparison of long-term baseline data directly related to production.

Comment: We also received comments claiming an insufficient assessment of stressors, especially contaminants, relating to that decline. The comments outline specific study goals, and investigations submitted to the refuge for funding in response to the refuge and the Audubon Society of New Hampshire having received funding to study the decline of loons and osprey in the area.

Response: The statements that the specific proposed study goals were funded and not adequately addressed is out of context and inaccurate. We sincerely appreciate the concern of the conservation groups that led to the funding of a large study into the loon decline: the Audubon Society of New Hampshire, Loon Preservation Committee, and the Biodiversity Research Institute.

When Congress considers funding a proposal of this nature they request, through the Department of Interior, that the refuge submit a “Capability Statement” to ensure that the proposal meets refuge needs and is possible under current staffing and funding. The refuge is then asked if the project has been previously identified for funding. In this case, it had been, and the refuge detailed four previously identified projects where the funding would be used. That process ensures that private interests, funded through lobbying efforts, do not contradict refuge management objectives.

Our staff and Audubon Society of New Hampshire formed a working group with state fish and game agency personnel, academicians, and the conservation groups previously mentioned, to solicit proposals for scientific studies to investigate aspects of the four funded projects. Many aspects of the study detailed in the comment were proposed, but not funded, based on decisions related to cost-benefit analysis, fiscal responsibility, and whether the proposals aligned with refuge goals.

Comment: Another comment stated that the FERC licensee, FPL Energy, has voluntarily conducted numerous studies in addition to loon monitoring and water level operations. It further mentions that those studies have provided valuable information to state and federal wildlife agencies to assist them in loon management. It also states that all of that work has been funded and conducted by licensee biologists and their consultants.

Response: We appreciate the efforts and interest of the licensee, but disagree that it has funded all loon work on Umbagog Lake. The refuge has provided funding at various times to assist some of those projects. Scientific studies on the lake have the potential to cause unforeseen conflicts with other studies or increase impacts on wildlife. We would like to state the importance of coordinating these studies to minimize those risks.

Comment: Several comments mentioned a concern about increased public disturbance and boat wakes negatively affecting loons.

Response: We appreciate that concern, and encourage all who use the water resources of the Umbagog Lake area to keep a safe distance from all species of wildlife to minimize disturbance. We intend to increase educational outreach to the public on this issue (see final CCP/EIS alternative B, goal 1, objective 1.6, “Common Loon,” for more information).

10.4b Fish (e.g., brook trout)

(Letter ID#: 16, 155)

Comment: One individual testified about the importance of protecting headwater streams for fish and aquatic organisms, and the significance of the native brook trout fishery in the tributary rivers that enter Umbagog Lake. Other comments mentioned the threats to the native population of brook trout. Those threats fall into two categories: threats from small-mouth bass in the Rapid River, and the condition of brook trout in the region as a whole.

Response: We acknowledge the importance of the native brook trout fishery in this region, and are working closely in partnership with state and non-profit conservation agencies. The refuge has participated in telemetry studies into the movement of brook trout and small-mouth bass, and studies into flow rates aimed at reducing the potential for small-mouth bass to breed in the Rapid River. We plan to continue that partnership, and refer to the Eastern Brook Trout Joint Venture as providing guidance (see final CCP/EIS chapter 1, under “Conservation Plans and Initiatives Guiding the Project”). We also include in chapter 2, alternative B, goal 1, objective 1.5, and goal 4, objective 4.2, our plans to work with others to maintain or restore a quality brook trout fishery in local rivers, such as the Rapid, Dead Cambridge and Dead Diamond rivers.

We also recognize the importance of protecting headwater streams in maintaining the health of aquatic ecosystems. That protection will become increasingly important as climate change and related stressors begin to affect coldwater-dependent aquatic species. Our proposed forest habitat management guidelines (final CCP/EIS appendix K, “Forest Management Guidelines,”) will help ensure the protection of the water quality of headwater streams on the refuge.

Please note that we changed our references in the final CCP/EIS to “Open water and Submerged Aquatic Vegetation” to more accurately reflect the diversity of habitats wildlife are responding to.

10.5 Furbearer Management

(Letter ID#: 1, 8, 13, 14, 17, 27, 28, 36, 37, 38, 39, 41, 43, 44, 45, 46, 49, 53, 54, 55, 56, 57, 58, 66, 67, 74, 84, 87, 91, 98, 99, 101, 106, 109, 110, 113, 116, 122, 123, 141, 145, 148, 152, 154, 157, 161, 162, 257, 263, 311, 314, 316, 317, 318, 322, 328, 329, 331, 332, 333, 334, 335, 342, 346, 348, 349, 350, 352, 354, 355, 356, 357, 358, 361, 362, 365, 366, 367, 368, 369, 371, 372, 373, 377, 382, 387, 389, 390, 391, 449, 450, 452, 575, 592, 597, 600, 611, 624, 626, 642, 645, 650, 652, 670, 696, 698, 708, 710, 713, 718, 720, 721, 722, 725, 816, 853, 864, 875, 879, 882, 891, 894, 896, 897, 901, 908, 918)

Comment: We received many comments either supporting or opposing public trapping in furbearer management. The comments that supported trapping were general, while the comments that opposed trapping were both general and specific in criticizing it, its potential impacts, and the level of supporting information we included in the draft CCP/EIS.

Response: Although we stand behind each state’s management of furbearers, the public comments clarified that we need to develop fully a furbearer management plan before presenting it for public review. We took all the public comments we received on this subject into consideration as we developed the final CCP/EIS.

We have determined the need for further analysis, and will conduct separate NEPA analysis and develop a furbearer management plan, if appropriate, as a step-down plan within 3 years of final CCP approval. We have removed the references in the draft to a public trapping program from the final CCP/EIS, and have removed that compatibility determination from appendix C. Public trapping at the refuge will be closed until we have prepared, reviewed, and finalized a Furbearer Management Plan. The refuge will work closely with the NHFG and MDIFW in preparing that plan.

11.0 Floodplain, Lakeshore, and Riparian Habitats and Species

(Letter ID#: 698)

Comment: One commenter recommends expanding the refuge to support the “astonishing amount of wildlife” that depends on these habitat types.

Response: We agree those are areas of very diverse, rich habitat. Our expansion proposal in the final EIS/CCP, appendix A, “Land Protection Plan,” discusses their importance.

11.1 General Management Direction

No specific comments received

11.2 Habitats (Wooded Floodplain; Lakeshore Pine-Hemlock; Vernal Pools)

No specific comments received

11.3 Wildlife Species

11.3a Bald Eagles and Osprey

11.3b Woodcock

(Letter ID#: 100, 101, 135, 257, 698, 769)

Comment: A number of commenters recognized the important habitat the area around Umbagog Lake provides for a wide variety of species, including bald eagles, and supported refuge expansion to protect habitat for them.

Response: The refuge was established, in part, to conserve migratory birds, important wetlands, and wetland-dependent species, and that purpose has guided our final CCP/EIS, appendix A, “Land Protection Plan.” It identifies additional significant wetlands and their associated uplands in the Umbagog watershed, along the Magalloway River, Swift Cambridge River, Mollidgewock drainage, and Bog Brook, among others. Those areas will help provide the critical habitat for migratory birds and other species of concern the commenters mentioned.

Comment: One commenter suggested we change our strategies under goal 2 to include the identification of suitable habitat for rusty blackbirds and northern parulas, and document their use.

Response: We agree with that suggestion, and have edited those changes into final CCP/EIS chapter 2, alternative B, goal 2, objective 2.1.

Comment: One commenter suggested that our discussion of osprey trends in alternative B, goal 2, objective 2.3 is misleading, because different methodologies were used at different times.

Response: We agree that re-analyzing the data to ensure comparisons between similar methodologies would be more appropriate, and will work with the Audubon Society of New Hampshire to accomplish that and ensure the continued use of standardized methodologies. To reduce confusion, we have edited changes into final CCP/EIS chapter 2, alternative B, goal 2, objective 2.3.

12.0 Upland Forest Matrix Habitats and Species

12.1 General Management Direction

12.2 Habitats (Spruce-Fir; Mixed Woods; Northern Hardwoods)

(Letter ID#: 48, 91, 96, 99, 101, 103, 112, 134, 135, 137, 149, 308)

Comment: Forest habitat management inspired a number of comments, both for and against. Supporters cited the economic and cultural importance of logging in the area, while opponents often cited aesthetics and the changes on surrounding industrial timberlands, or opposed commercial logging in general.

Response: The refuge was established, in part, for migratory bird conservation. Therefore, we have a responsibility to manage it in ways that enhance migratory bird habitat. During the planning process, in concert with our state natural resource agency partners, we identified species and habitats of greatest management concern, based on existing state, regional, and national wildlife management plans. (See final CCP/EIS chapter 1, under “Conservation Plans and Initiatives Guiding the Project,” and appendix B, “Species and Habitats of Conservation Concern Known or Suspected on the Refuge,” and “Process for Establishing Alternative B Focal Species,” for a complete description of the process we followed in identifying management priorities.) Although we assigned wetland resources our highest management priority, we also assigned upland habitats that support migratory birds of regional conservation concern a high priority for management. Appropriate forest management can benefit many of those upland species tied to forested habitats with particular characteristics of structure and composition.

The appropriate management of adjacent uplands also serves to protect our wetlands. The land use objectives of previous owners of timberland in the refuge area focused primarily on commercial timber production, rather than on the creation of wildlife habitat. For that reason, the existing stands of forest do not necessarily have the species composition, diversity, complexity, structure, or age class distribution our focal wildlife species prefer. The objective of our forest management is to sustain, create, enhance, or restore forest conditions important for our focal forest-dependent species. Appropriate, sustainable forest management, using accepted best practices, can play an important role in improving habitat for those species while providing some economic benefit, helping the local community, and offsetting the costs of management (see final CCP/EIS appendix K, “Forest Management Guidelines”).

Comment: Some commenters not completely opposed to forest management urged that we minimize logging on refuge land and keep undisturbed some areas for wildlife.

Response: Map K-1 in final CCP/EIS appendix K, “Forest Management Guidelines,” shows how we divided the refuge ownership into several types of forest management zones. In the zones we designated “high resource sensitivity,” we will allow only extremely limited management activities. Those zones, which include forested and non-forested wetlands and some forested upland habitats, will provide substantial areas of unmanaged forest.

Comment: One commenter suggested that we collaborate as partners with other landowners, agencies, and the states in implementing forest management, rather than hire new refuge staff.

Response: We welcome partnerships and opportunities to work with other landowners and agencies to accomplish our forest management objectives. Hiring a refuge forester will help us develop a comprehensive forest habitat management plan that meets our wildlife management goals, and will also help ensure continuity in our forest management. Hiring new staff does not preclude those other options, particularly until our budgets permit hiring a forester.

Comment: Some commenters pointed out that the State of New Hampshire owns land and conservation easements within the refuge acquisition boundary, and that the state can manage that land for various purposes, including timber.

Response: We recognize the state’s right to manage state-owned lands, and we hope to continue to cooperate with the state on management issues of common interest. That reflects a continuation of the philosophy of partnership that formed the foundation of the original EA (1991) and first established the refuge. The Service now owns in fee some former timber company lands on which the state owns easements. The wildlife-oriented mission of the Service differs substantially from the forest-product-oriented missions of the original landowners. However, as we state in the first paragraph under this sub-heading, we intend to use forest management, where appropriate, as a management tool in accomplishing our wildlife habitat goals and objectives. The strategies we list in final CCP/EIS chapter 2, alternative B, goal 3, objective 3.1, clearly state that we will use timber harvesting in managing our upland forest habitat for the benefit of our focal species. Given that intention and our wildlife-oriented mission, we do not feel that elevating timber harvesting to the level of an objective in the plan is appropriate. However, we do agree that our original EA (1991) emphasizes forest habitat management. We edited the final CCP/EIS to acknowledge that emphasis.

Comment: Several commenters expressed their support for the refuge acquisition and management of upland habitat, particularly spruce-fir habitat, for wintering deer and other species.

Response: We agree that our forest management, together with our proposed land acquisition, can benefit wildlife in those habitats, and thank those commenters for their support.

12.2 Habitats

(Letter ID#: 101, 134)

Comment: One commenter supported alternative B for providing connectivity of forest habitat for wide-ranging species.

Response: We appreciate that support, and thank the commenter.

12.3 Wildlife Species—Mammals

12.3a Lynx

(Letter ID#: 91, 98, 101)

Comment: Several commenters were concerned about the potential impact of our proposed furbearer management program on Canada lynx.

Response: We are engaged in surveys to assess the status of lynx on the refuge. In response to extensive public comment on our proposed furbearer management, we now propose to postpone our decision on whether and how to manage furbearer species, and whether that management could include trapping, until we can conduct further analysis and prepare a more detailed Furbearer Management Plan. Therefore, we have removed the compatibility determination on furbearer management from appendix C, and have removed references to implementing a public trapping program from the final CCP/EIS. We propose to complete a furbearer management plan, with separate NEPA analysis and public involvement, as a step-down plan within 3 years of final CCP approval (see our responses in this document under the section “Furbearer Management”). We will work closely with the states in preparing that plan. Until then, we will close the refuge to public trapping.

12.4 Wildlife Species—Avian

(Letter ID#:100)

Comment: One commenter stated that the blackburnian and black-throated green warblers were inappropriate focal species for the spruce-fir habitat type. This commenter also advocated making spruce-fir habitat a high management priority.

Response: As we state in final CCP/EIS chapter 2, alternative B, goal 3, we view the refuge as located in the mixed spruce-fir/northern hardwood forest “potential vegetation zone” (not the spruce-fir potential vegetation zone). Our objective is to maintain a healthy, fully functioning, mixed-forest ecosystem. We view spruce-fir stands as one habitat component of the mixed spruce-fir/northern hardwood forest. Our analysis suggests that the spruce-fir component appears to be less widely distributed than it was formerly in the mixed forest. Based on our analysis of regional bird conservation plans and other conservation plans, the blackburnian and black-throated green warblers, which are closely tied to mixed forest systems, are appropriate representatives of the mixed forest zone for management purposes.

Because those species depend on the presence of a substantial percentage of conifers on the landscape, one of our strategies will be to make our acquisition and management of spruce-fir habitat a high priority, and focus on maintaining and increasing the extent and resiliency of spruce-fir stands within site capability limits. That management strategy should also benefit those bird species that are most closely tied to spruce-fir, such as the bay-breasted warbler, boreal chickadee, and gray jay. Many of the bird species the commenter refers to are at the

southern edge of their range at the refuge, and are likely to undergo further range contraction as climate change advances. However, we agree that, since they are more closely tied to spruce-fir, it is important that we continue to monitor them, in addition to the Blackburnian and black-throated green warblers, as part of our annual off-road breeding bird surveys. To help clarify that, we have added language to objective 3.1.

13.0 Cultural and Historic Resources

13.1 General Management Direction

No specific comments received.

14.0 Priority Public Uses

14.1 General Management Direction

(Letter ID#: 29, 50, 56, 64, 84, 90, 92, 102, 230, 912, 918)

Comment: The comments we received about public use of the refuge generally were critical of our proposals. At one end of the spectrum, the commenters promoted no restrictions, taking the viewpoint that public land is for use by the public. They favored following generalized state regulations without specific refuge regulations. At the other end of the spectrum, commenters valued the refuge for its ecological significance, and prioritized biological integrity, ecological health and a safe haven for wildlife over human use of the refuge, (especially consumptive uses such as hunting, fishing and trapping).

Response: The following laws, policies, goals and information influence public use of the refuge.

- National Wildlife Administration Act of 1996
- Refuge Recreation Act of 1962, as amended by the National Wildlife Refuge System Improvement Act of 1997
- Executive Order No. 12996, March 25, 1996
- USFWS Policy on Appropriateness of Refuge Uses
- USFWS Policy on Compatibility
- Executive Order No. 13443 (August 16, 2007), “Facilitation of Hunting Heritage and Wildlife Conservation”

Throughout our development of this final CCP/EIS, we remained sensitive to the desire of the local populace to maintain the public uses in the establishing EA (1991). We also wanted to minimize additional refuge regulations, and align them as closely as possible with state regulations to avoid potential confusion. Adopting state regulations wholesale is not possible, because federal laws sometimes require different regulations than the state laws do.

The Improvement Act requires the Service to manage refuges as a system of lands, not as individual field stations. In determining whether a public use is compatible, the refuge manager must determine that it will not materially interfere with or detract from fulfilling the mission of the National Wildlife Refuge System or the establishing purposes of the refuge. The refuge manager also must be careful that the use does not detract from or conflict with other allowable uses. It must be evaluated in terms of its anticipated impacts on refuge natural resources, and whether the staffing and funding for managing it are adequate.

Some comments under this heading were not specific about the priority public uses defined by Executive Order No. 12996, but related to public use in general. The draft CCP addresses the uses known to occur on the refuge and those brought to our attention during our public scoping process. We also considered the additional public uses that arose in the public comment period for the draft CCP/EIS and, in response, have added these compatibility determinations to the final CCP/EIS in appendix C: horseback riding and bicycling. We also modified two other compatibility determinations to incorporate public comment. We modified and renamed “Gathering of blueberries, black berries, and raspberries” to “Recreational gathering of blueberries,

blackberries, strawberries, raspberries, fiddleheads, mushrooms, and antler sheds.” We also modified the compatibility determination on snowmobiling to add the use of dogsleds on snowmobile trails, as state law allows. We removed the compatibility determination on furbearer management from the final, and will reconsider it as part of our furbearer management plan, a step-down plan scheduled within 3 years of final approval of this CCP, and subject to separate NEPA documentation and public review.

14.2 Visitor Safety

(Letter ID#: 321, 352, 909)

Comment: Commenters raised concerns about visitor safety in three areas: trapping (furbearer management), hunting, and access to help in emergency situations (especially in remote camping).

Response: We removed our proposal to implement a public trapping program as part of our furbearer management from the final CCP/EIS, and will reconsider it as a step-down plan separately from this CCP, with its own NEPA public review. At that time, we will consider the potential impacts of trapping on visitor safety. Public trapping on the refuge is now closed, and refuge law enforcement personnel will cooperate with state conservation officers and game wardens in enforcing laws on the refuge.

Comment: One commenter raised concerns about safety related to hunting.

Response: We note the comment, but feel that opportunities are ample for both the hunting and non-hunting public to enjoy the refuge. New Hampshire Fish and Game statistics (2007) indicate that between 2000 and 2007 an average of only 3.3 hunting-related incidents per year occurred in New Hampshire. Only two hunting-related fatalities have occurred in New Hampshire in the last 14 years. Moreover, more than 95 percent of hunting incidents in the state have occurred between hunters. Over the past 45 years, only 11 hunting-related incidents involving non-hunters have been reported in New Hampshire.

Comment: Access to help in emergencies was another concern.

Response: We understand the unease many visitors experience, especially with the lack of cell-phone service in the area. That is especially true of campers at remote campsites who experience an emergency. All outdoor recreation involves risks. Everyone must consider those risks and prepare for emergency situations. We cooperate with state agencies in reporting emergencies and in allowing emergency personnel to use refuge radio frequencies during an emergency. We will forward any emergency information reported to refuge personnel to the appropriate authorities for the most efficient response. We hope that all refuge users will assist others in emergencies by reporting those emergencies to the marine patrol, police, state park personnel, state personnel, or refuge personnel.

14.3 Access

(Letter ID#: 6, 7, 18, 60, 81, 90, 112, 124, 130, 135, 152, 158, 232, 233, 319, 320, 326, 336, 479, 492, 506, 508, 642, 919)

Comment: Several commenters felt strongly that, because the refuge is public land and is paid for by tax dollars, it should be open to everyone to enjoy. Along with that sentiment, those commenters frequently discussed their ethics in asking for permission from landowners, taking care of the land, and acting respectfully and responsibly while using it.

Response: We appreciate those comments, and compliment the people and companies whose stewardship of the land and forests contributes to the conservation of wildlife habitat around Umbagog Lake.

When the federal government purchases property, it does so for a specific reason. The Service purchased land for the refuge for the following purposes, and under the following authorities (see also final CCP/EIS chapter 1, “Refuge Establishment,” and each compatibility determination in final CCP/EIS appendix C).

1. “the conservation of the wetlands of the Nation in order to maintain the public benefits they provide and to help fulfill international obligations contained in various migratory bird treaties and conventions...” (Emergency Wetlands Resources Act of 1986, 16 U.S.C. 3901(b))
2. “for use as an inviolate sanctuary, or for any other management purpose, for migratory birds.” (Migratory Bird Conservation Act, 16 U.S.C. 715d)
3. “for the development, advancement, management, conservation, and protection of fish and wildlife resources...” (Fish and Wildlife Act of 1956, 16 U.S.C. 742(a)(4))
4. “for the benefit of the United States Fish and Wildlife Service, in performing its activities and services. Such acceptance might be subject to the terms of any restrictive or affirmative covenant, or condition of servitude...” (Fish and Wildlife Act of 1956; 16 U.S.C. 742f(b)(1))

Those acts, in combination with other laws, presidential directives and Service policies, determine the type of public access and use that we consider compatible. The Improvement Act clarifies that refuges are places where “wildlife comes first,” and public access or use is secondary to the wildlife mission of each refuge. Access and use for hunting, fishing, wildlife observation and photography, and environmental education and interpretation are to be facilitated whenever possible, provided they do not detract from those establishing purposes. Finally, we can consider all other public uses if they do not materially detract from or interfere with the purposes for which each refuge was established.

Much of the Umbagog area was open to the public long before the refuge was established. We recognize the importance of outdoor recreation for the local economy, the close ties that people have to the land, and that people generally have used the land responsibly, at a level where the impacts of public use have been minimal. As public land managers, we are responsible for ensuring that the level and type of public use on the refuge do not compromise its establishing purposes. For that reason, we need to consider how the levels of public use might affect refuge resources or conflict with each other.

Comment: Many commenters were concerned about access to waterways. Most were concerned that the refuge would curtail access to the lake and logging roads.

Response: We listened to public concerns about closing the boat launch at refuge headquarters, also known as the “Brown Owl” launch, and reconsidered our position on closing it. By keeping it open, we feel that the final CCP/EIS does not restrict access to the lake or rivers (see also our response in this document under the heading “Buildings and Facilities”).

We have also included maps 2–8 and 2–9 in chapter 2, alternative B of the final CCP/EIS to delineate which logging roads we will keep open to allow access for all compatible uses (see our response in this document under “Roads”). In the final CCP/EIS, chapter 2, alternative B, “Introduction,” we state, “we would maintain open designated major road corridors in the expansion lands to facilitate access....” Maps 2–8 and 2-9 designate all major routes of travel to facilitate public use and our habitat management or other administrative purposes. We will close the smaller, less frequently used gravel roads, because the cost-benefit ratio of keeping them open between cutting cycles is prohibitive. As did previous landowners, we will perform major maintenance on roads periodically, especially before or during logging operations. The rest of the time, we will perform only minor maintenance, until the roads are needed again for management purposes.

Comment: Some commenters opposed constructing improved access at Sturtevant Pond and B Pond.

Response: In response to that concern, we have reconsidered our position on improving the boat launches in those areas, have removed the proposal for a boat launch at Sturtevant Pond, and have scaled back our proposal at B Pond in the final CCP/EIS. If we are fortunate enough to purchase the land surrounding B Pond from a willing seller, we might improve parking for a small number of vehicles to provide a safe pull-off area away from the shoreline to access B Pond and carry boats down the anglers’ trail.

Comment: Some commenters favored limiting the use of some areas to non-motorized recreation only.

Response: Designating wilderness areas generally prohibits the use of motorized or mechanized equipment. We completed a wilderness review for the refuge, (final CCP/EIS appendix D, “Wilderness Review”), but found that the refuge lacks large, contiguous blocks of land suitable for wilderness designation. However, smaller areas on the refuge offer non-motorized recreation as the only means of travel. Visitors who want to experience the refuge under their own power might find satisfaction in those areas. Any new lands we acquire in fee in the future will be subject to a new wilderness review during the next CCP update in 15 years.

Comment: Others were concerned that the refuge would cut off access to their private property, especially during seasonal closures for the nesting season.

Response: We do not intend to cut off any reasonable access to private property. In fact, several landowners have obtained special use permits to cross refuge land to access their properties when that access otherwise would not be allowed.

Concern: Some expressed concern that the refuge did not recognize the State of New Hampshire easement for a snowmobile trail over refuge lands.

Response: We do recognize that easement, and have been cooperating on it with the state.

Comment: Another commenter was concerned that non-hunters would have limited or curtailed access to the refuge during the hunting season.

Response: We have not set any restrictions that would preclude non-hunters using the refuge during the hunting season. We believe the opportunities are ample for both hunters and non-hunters to enjoy the refuge during the hunting season.

14.4 Hunting

(Letter ID#: 2, 27, 37, 47, 50, 72, 73, 98, ,101, 102, 111, 145, 148, 462, 257, 263, 291, 327, 352, 356, 368, 377, 385, 389, 432, 600, 642, 652, 894, 908, 919, 928)

Comment: Some comments opposed any form of hunting on national wildlife refuges, and expressed concern that hunting is inconsistent with the meaning of the phrase “refuge for wildlife.” Others favored more restrictive hunting regulations.

Response: The Improvement Act identifies hunting as one of six priority, wildlife-dependent public uses that are to receive enhanced consideration in refuge planning. The others are fishing, wildlife observation and photography, and environmental education and interpretation. Our mandate is to provide high-quality opportunities for those priority uses when they are compatible with refuge purposes, goals, and other management priorities. The Act does not establish a hierarchy among the six priority uses, but requires us to facilitate them when they are compatible and appropriate. Executive Order No. 13443 (August 16, 2007), “Facilitation of Hunting Heritage and Wildlife Conservation,” reinforces the importance of hunting for recreational and management purposes on national wildlife refuges. That order recognizes the declining trends in hunting, and directs the Department of the Interior and other federal land management agencies to “facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat.” It also states that federal agencies are to “manage wildlife and wildlife habitats on public lands in a manner that expands and enhances hunting opportunities, including through the use of hunting in wildlife management planning.”

Our Regional Visitor Services Program Team also has identified hunting as an “area of emphasis” for this refuge. In addition, the 1991 EA that established the refuge stated our commitment to continuing traditional, wildlife-oriented public uses, including hunting. At the time, that commitment received considerable support from the

states of Maine and New Hampshire and the public. We are committed to honoring our pledge to offer quality hunting programs.

To meet those mandates, we implemented a hunting program for waterfowl, migratory game birds, upland game and big game on the entire refuge in 2000. In the final CCP/EIS, chapter 2, alternative B, goal 4 supports enhancing priority public use opportunities, including hunting, called for by Executive Order No. 13443 and the Improvement Act. Final CCP/EIS appendix C, "Compatibility Determinations," includes our determination on hunting.

The current refuge hunt plan includes a number of refuge-specific regulations that are more restrictive than are the state regulations (refer in final CCP/EIS appendix C to "Compatibility Determination on Public Hunting"). We believe those regulations suffice to protect refuge resources at this time and no further restrictions are necessary.

Comment: Some commenters felt that we had not addressed adequately the impacts of hunting on other visitors or wildlife, its compatibility with refuge purposes, alternatives to hunting, and its cumulative effects. They also questioned our justification of hunting as a management tool.

Response: We released our Final Amended Environmental Assessment for Public Hunting on April 23, 2007. It presents a full range of alternatives, including a "no hunting" alternative, and analyzes their impacts. After public review, we published the amended refuge regulations in 50 CFR. The 2007 Hunt Plan EA also includes an analysis of cumulative impacts of the preferred alternative. Final CCP/EIS appendix C, "Findings of Appropriateness and Compatibility Determinations," includes a compatibility determination for public hunting. We consider those analyses to be sufficient. Although hunting can be used as a management tool on refuges, we also have been directed to facilitate recreational hunting by Executive Order No. 13443 (August 16, 2007), "Facilitation of Hunting Heritage and Wildlife Conservation," and the Improvement Act.

Comment: We received a number of letters in support of hunting.

Response: We thank those commenters for their support.

Comment: Several of the commenters who supported hunting nevertheless objected to the refuge-specific hunting regulations. They felt that the state hunting regulations were adequate, and that having different federal and state regulations could lead to confusion. They were also concerned that we might close the refuge entirely for hunting.

Response: Most of the refuge hunting regulations are identical to those of the states of Maine and New Hampshire, in terms of their bag limits, seasons, and huntable species, with the exception of turkeys and bobcats. We will evaluate modifying our current hunt plan, including the possible future addition of turkeys and bobcats, the next time we update the hunt plan (see final CCP/EIS alternative B, goal 4, objective 4.1). We will release any proposed changes for public review, and publish them in 50 CFR before we implement them. Other refuge-specific regulations are designed to minimize impacts on refuge resources and maintain public safety. Refer to 50 CFR 32.2 for regulations that apply to hunting on all national wildlife refuges. For example, those regulations prohibit hunting over bait. The public concern about confusion over regulations is a valid one, and we intend to increase hunter education and outreach to minimize the potential for confusion about federal or refuge-specific hunting regulations. In addition, we will be posting the refuge boundary, which should help clarify where those regulations apply.

The strategies in final CCP/EIS alternative B, goal 4, objective 4.1, "Hunting," propose to improve the hunting program and the facilities open to hunters, not to restrict or eliminate hunting. Hunting is a priority public use, one of emphasis on the refuge. The refuge has been open officially to hunting since 2000, and no part of this final CCP/EIS implies any intent on our part to close it to hunting in the future. As resource needs warrant, we might adjust the refuge hunting regulations, including the areas of the refuge open to hunting from time to time, in coordination with the states.

Comment: One commenter felt that the refuge hunting regulations were anti-dog.

Response: We permit the use of dogs in hunting migratory game birds, some upland game species, including hare and ruffed grouse, and some big-game species, including bear and coyote, during state seasons. We designed the restrictions on uncontrolled dogs at other times to protect breeding birds and other species from harassment. Current Maine state hunting regulations prohibit allowing dogs to “run at large” at any time, except when being used for hunting.

Comment: One commenter voiced support for an interstate working group to improve regulatory consistency.

Response: We appreciate the commenter’s support. Final CCP/EIS chapter 2, alternative B, goal 4, objective 4.1, includes our proposal to establish a working group with Maine and New Hampshire wildlife agencies to help coordinate hunting seasons on the refuge. We believe that will help promote regulatory consistency.

Comment: One commenter suggested we should maintain some hunting areas, particularly in the proposed expansion area, as “walk-in only,” to “make the experience more rewarding.” The commenter also suggested we should designate an area for hunting with traditional firearms only.

Response: Final CCP/EIS chapter 2, alternative B, goal 4, objective 4.1 states our commitment to providing a high-quality hunting experience, including uncrowded, challenging conditions. We believe our road and trail plans will provide a reasonable mix of areas both readily accessible and less readily accessible for hunting. We have not seen a high demand for an area solely for muzzle-loaders or long bows. However, should that demand rise, we will consider the suggestion in developing future hunting management plans.

14.4.a Waterfowl

(Letter ID# 102)

Comment: One commenter expressed the desire that we “leave duck hunting alone.” Others expressed their dissatisfaction with the refuge hunting blinds.

Response: Although we are not sure exactly which aspects of the refuge-specific waterfowl regulations the commenter objects to, we are not proposing to change any of them. Our current regulations are identical to the states in their seasons, species and bag limits. We agree that many of the duck blinds need repair, and might need relocation. We are interested in meeting with duck club members to discuss how best to improve the blinds and duck hunting on the refuge.

14.4.b Game or Other

No specific comments

14.5 Fishing

(Letter ID#: 107, 108, 111, 145, 257, 386, 894, 908, 910)

Comment: Some comments opposed any fishing on national wildlife refuges, and expressed concern that fishing, a consumptive use, is inconsistent with the meaning of the word “refuge.”

Response: The Improvement Act identifies fishing as one of the six priority, wildlife-dependent public uses that are to receive our enhanced consideration in refuge planning. The others are hunting, wildlife observation and photography, and environmental education and interpretation. Our mandate is to provide high-quality opportunities for those priority uses when they are compatible with refuge purposes, goals, and other management priorities. Our Regional Visitor Services Program Team has identified fishing, along with the other five priority public uses, as “areas of emphasis” for the refuge. In addition, the original 1991 EA establishing the refuge states our commitment to continue offering traditional wildlife-oriented public uses, including fishing.

Comment: One commenter expressed concern about the impacts of fishing tackle, line, and other debris on the environment and wildlife.

Response: We appreciate that concern, and have addressed it in our public fishing compatibility determination, where we stipulate that lead tackle will be prohibited on the refuge. We will also increase our public education and outreach on that subject.

Comment: Several commenters enjoyed fishing in the area, supported fishing and more fishing access, and felt that the expansion of the refuge might enhance opportunities for fishing.

Response: We thank those commenters for their support, and are committed to continue providing high-quality opportunities for fishing on the refuge in the future.

Comment: Several commenters expressed their concern that the refuge might restrict or close fishing.

Response: The original 1991 EA that established the refuge clearly states, “Uses of the lake and rivers such as fishing and boating will continue, subject to existing state regulations.” Fishing is also one of the six priority public uses to receive our enhanced consideration on national wildlife refuges. Final CCP/EIS chapter 2, alternative B, goal 4, objective 4.2 reaffirms that we will “continue to allow access for fishing, in accordance with states of Maine and New Hampshire regulations, except in sensitive areas during nesting season.” We have never intended to close the refuge for fishing and, far from trying to “shut fishing down,” we have proposed increasing and improving fishing access under alternative B, objective 4.2.

Although we have allowed fishing access on the refuge since its inception, officially opening the refuge for fishing requires that we assess its compatibility with refuge purposes and publish our intention and any refuge-specific regulations in the Code of Federal Regulations (50 CFR). Our compatibility determination on fishing in the final CCP/EIS, appendix C, “Findings of Appropriateness and Compatibility Determinations,” and the strategies in chapter 2, alternative B, goal 4, objective 4.2, will complete that official opening of the refuge for fishing.

We realize that requirement to notify the public might be confusing, but it does not signify that we intend to close the refuge to fishing. To fulfill our wildlife mission, we occasionally might have to close certain areas seasonally to fishing, to protect nesting birds (waterfowl, loons, eagles, etc.) from disturbance or protect the fishery resource. We will coordinate those actions with the state wildlife agencies. We recognize that those temporary closures might be unpopular with some anglers. However, we are also proposing to improve access for fishing in other areas.

Comment: Several commenters want the refuge to be open to fishing derbies, in particular, ice-fishing derbies.

Response: We are committed to supporting recreational fishing as an enjoyable, wildlife-dependent family-oriented activity that promotes an appreciation of fish and wildlife. We have concerns regarding intensity of use and potential impacts with regard to fishing derbies, therefore, any competitive event will be considered on a case-by-case basis through a Special Use Permit. We also recommend that people interested in fishing derbies follow appropriate state requirements.

Comment: One commenter suggested that we provide enhanced opportunities for fishing education.

Response: We agree that providing opportunities for fishing education is an important component of promoting public appreciation of fishing. Final CCP/EIS chapter 2, alternative B, goal 4, objective 4.2, includes strategies to continue our annual “Take Me Fishing” event. Recently, we combined that event, which traditionally has included instruction in tying flies and fly-fishing techniques, with the annual Umbagog Wildlife Festival.

14.6 Viewing and Photographing Wildlife

(Letter ID#: 713, 721)

Comment: Several commenters appreciated the opportunity to view various species of wildlife at the refuge.

Response: We thank them for their comments.

14.7 Interpretative and Environmental Education

(Letter ID#: 4, 16, 199)

Comment: Several commenters wrote to say that we should expand our outreach and education for the public with environmental programs and interpretation of natural history. Others suggest that we should mount outreach to non-profits to encourage them to establish environmental education programs.

Response: We thank the commenters for supporting outreach and education. We agree that increasing outreach, interpretation, and education would benefit visitors and the local community. We are also excited about the opportunity to work with non-profits in providing opportunities in environmental education for students and teachers. We discuss that type of program primarily in goal 5 of alternative B in chapter 2 of the final CCP/EIS.

Improving refuge facilities will also enhance refuge interpretation and environmental education programs. Planning and developing a new visitor center will include exhibits; nature trails will include interpretative signs; and kiosks will be located at various points on the refuge to welcome and orient visitors and provide natural history interpretation.

15.0 Other Public Uses

(Letter ID#: 56, 60, 84, 90, 107, 108, 111, 112, 138, 318, 353, 645, 665, 685)

Comment: Some commenters were concerned about the type of recreational activities we allow on the refuge. Some specifically mentioned the “big six” priorities in the Improvement Act, and felt that those were the only uses we would allow. Several commenters wanted us to develop those and other recreational uses, rather than just allow them. Others stated that we should do a better job with what we have.

Response: Goals 4 and 5 in each section of alternative B in chapter 2 of the final CCP/EIS clearly spell out the types of recreational use we will allow on the refuge. Our list of activities encompasses much more than the “big six” priority public uses in the Improvement Act. We include hunting, fishing, wildlife observation, nature photography, camping, boating, environmental interpretation, environmental education, bicycling, horseback riding, snowmobiling, dog sledding on snowmobile trails, hiking, cross-country skiing, snowshoeing, and the recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds. Please refer to the compatibility determinations in appendix C of the final CCP/EIS for their specific stipulations for compatibility.

As for developing uses and doing a better job with what we have, we agree. In fact, in final CCP/EIS chapter 2, alternative B (our preferred alternative), goal 4, we propose improving the priority uses we allow by improving access and providing new infrastructure.

Comment: Several commenters mentioned allowing traditional uses of the land to continue. Others wanted us to continue to allow the traditional uses and all 30 popular forest- and water-based recreational activities in the NH SCORP.

Response: We purchased the land for the refuge for specific reasons, under certain authorities (see the section “Access” in this document). The Improvement Act not only defines priority public uses, but also establishes a process for determining whether they are appropriate and compatible with the purposes for which a refuge was established (see final CCP/EIS chapter 1 and appendix C, “Findings of Appropriateness and Compatibility Determinations”). All uses are considered closed until we open them through that process. We considered all public input during the entire planning process, and frequently referred to the public sentiment expressed during the scoping for the 1991 EA that established the refuge. We have considered every use identified during both of those planning processes. The final CCP/EIS allows most of them to continue, with some stipulations. Please refer also to our response in this document under the section “Uses Determined Inappropriate.”

Comment: Several commenters wanted a process for approving new campsites and trails.

Response: Minor changes in campsites and trail locations could occur over the life of this plan, at the discretion of the refuge manager. Significant changes to this plan would be subject to further NEPA analysis (see in final CCP/EIS chapter 2, “Actions Common to All Alternatives,” “Additional NEPA Analysis”).

Comment: Others requested a public comment process before discontinuing any recreational use.

Response: We understand that comment, but the Improvement Act makes it clear that recreational uses are considered closed until we open them through findings of appropriateness, corresponding compatibility statements, sufficient NEPA analysis, and ensuing public review. We solicited public comment during the scoping and public review of the draft CCP/EIS. We have considered many recreational uses, and have completed compatibility determinations to open the refuge officially to the uses the public has requested, whenever they do not materially interfere with or detract from the establishing purposes of the refuge. In response to public comments, we have added the following recreational uses to the list of allowed uses in the final CCP/EIS: the recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds, dog sledding on snowmobile trails, bicycling, and horseback riding.

15.1 Remote Camping

(Letter ID#: 10, 11, 93, 119, 135, 196, 199, 321)

Comment: Commenters were concerned about the limited number of sites available to paddlers, especially as we acquire more land for the refuge. Some asked that we consider adding more sites, especially along the Magalloway River, to facilitate traversing the Northern Forest Canoe Trail. They desired campsites at 7-mile intervals for through-paddlers, and were concerned that recent and planned closures are affecting that use.

Response: We acknowledge those comments and understand them, but stand behind the strategies in the final CCP/EIS, chapter 2, alternative B, goal 4, objective 4.4. We feel that the private land adjacent to the refuge provides ample opportunity for increased camping that could satisfy that need.

Comment: One commenter was concerned that the refuge was going to limit the size of campsites, which would preclude group camping, especially for paddlers.

Response: That confusion might have arisen from draft CCP/EIS chapter 2, alternatives A and B, goal 4, objective 4.4, which simply states a strategy to limit campsite size. All remote sites on the refuge will remain at their present sizes. For larger groups, designated group sites are available: R-2, R-15, R-18, R-27 and R-31. Visitors on paddling trips should benefit from the camp site at Leonard Pond (R-28), which has been re-designated as a “short-term” site where reservations will be limited to a two-night maximum.

Comment: Along a similar line, we also received comments regarding the limited number of sites for paddlers and stating a desire to add more campsites. Also related were the complaints about previous closures of campsites at Pulpit Rock and Harper’s Meadow and the proposed closure of the campsites North 1 and North 2.

Response: We acknowledge the difficulty paddlers encounter in setting up their itinerary and reserving sites. We believe that the new designation of R-28 as a short-term site will help ease that difficulty. The previous and proposed closures are of campsites along river systems close to Route 16 North that do not meet the criteria in our preferred alternative, when remote camping facilitates wildlife observation “while allowing the visitor to be totally immersed in a quiet, private, primitive and natural setting” (refer to final CCP/EIS chapter 2, alternative B, goal 4, objective 4.4).

Comment: Others voiced concerns about the localized impacts of camping and gathering firewood.

Response: We agree with the comment that we should address the localized impacts of camping, rather than limit remote camping, and we appreciate the willingness of the AMC to offer its expertise in managing backcountry sites. We also agree with the commenter that gathering downed wood lowers the biodiversity of areas close to

campsites. We will work with the Umbagog Lake State Park to provide firewood at remote sites on the refuge, so campers will be able to buy a permit to burn that wood instead of gathering wood from refuge lands.

15.2 Boating

(Letter ID#: 16, 20, 48, 50, 61, 73, 87, 88, 89, 107, 109, 196, 199, 321, 326, 341, 400, 408, 432, 678)

Comment: The comments directed at boating split between restricting access and allowing access. They also split between limiting horsepower and not limiting horsepower for boats using the lake. The advocates of motorized boats are concerned that their access and use are gradually being restricted and might be eliminated in the future.

Response: We proposed closing the boat ramp at the refuge headquarters due to the limited sight distance along Route 16 North. After hearing the strong sentiment expressed at public hearings and in written comments, we have reconsidered that closure, and will keep that launch site open, with some modifications to improve its sight lines. We will also work with the state highway department on installing warning signs to improve the safety of the site.

Comment: Some commenters either feared the elimination of motorboat use, or proposed non-motorized boat use only.

Response: We have no intention of eliminating motor boat use on Umbagog Lake or its tributaries. As for restrictions on speed or horsepower, we will defer to the states of New Hampshire and Maine to set regulations. Conflicts among users have occurred in the past, and we urge all users to operate watercraft in a way that is courteous and respectful of others. Some of the Umbagog Lake Working Group tasks include boating education and ethics to reduce conflicts (final CCP/EIS chapter 2, in “Actions Common to All Alternatives”).

Comment: We received several comments on the proposed boat launches at Sturtevant Pond and B Pond. Most of them opposed constructing or expanding those launches.

Response: Both of these proposals depend on our being fortunate enough to negotiate with a willing seller and purchase those properties. We have reconsidered our position, and have eliminated the proposed launch at Sturtevant Pond. We have also reconsidered the improvements of the launch at B Pond (see also our response in this document under “Access”).

Comment: Many commenters were concerned about all types of watercraft disturbing wildlife.

Response: We appreciate that concern, and encourage all who use the water resources around Umbagog Lake to minimize that disturbance by keeping a safe distance from all species of wildlife. We will continue to cooperate with both states in minimizing those impacts by seasonally closing nesting areas to protect wildlife. We also have developed brochures to provide information to the boating public on these subjects: “Boating Courtesy” and “Guide to Wildlife Etiquette.” One of the criteria for siting the proposed refuge headquarters at the Potter Farm was to provide access for boaters to the office and educational outreach.

15.3 Snowmobiling

(Letter ID#: 5, 30, 67, 87, 91, 107, 108, 135, 141, 263, 274, 336, 342, 346, 347, 349, 350, 432, 473, 575, 592, 597, 600, 610, 611, 624, 626, 631, 645, 650, 652, 670, 690, 692, 696, 698, 699, 702, 708, 709, 710, 712, 713, 718, 720, 721, 722, 725, 726, 778, 788, 816, 820, 827, 833, 834, 835, 853, 856, 860, 864, 875, 882, 898)

Comment: Commenters in favor of snowmobiling were concerned about the continued access to and operation of snowmobile trails on refuge lands.

Response: All three alternatives propose to continue snowmobiling on designated trails. We propose to keep open the mapped, maintained trails that pass through the refuge for use both on existing refuge lands and in the expansion area. We will not allow the use of snowmobiles off-trail, on spur trails, or other trails not shown

on map 2–9. We will work with the states and the snowmobile clubs to reroute trails out of wetlands and deer wintering areas, and we might occasionally need to reroute trails around management activities such as logging.

Comment: Commenters were concerned about the expansion of trails in the expansion area.

Response: If we are fortunate enough to purchase lands from willing sellers, we will evaluate the mapped snowmobile trails and discuss the trail system with the states and local snowmobile clubs. We will allow the continued use of the mapped, maintained trails that pass through the refuge and do not detract from its purpose, but will not allow the use of spur trails or off-trail riding. We will consider relocating trails when it will reduce the impacts on the refuge, for example, by moving them out of wetlands and deer wintering areas.

Comment: The proponents of snowmobiling also mentioned its benefits for the local economy.

Response: We recognize those economic benefits (see final CCP/EIS chapter 4, in “Effects on Socioeconomic Resources”), and we intend to continue this public use.

Comment: Some property owners commented that they were concerned about access to their properties.

Response: We have no intention of closing off access to private property. Maps 2–8 and 2–9 in alternative B in chapter 2 of the final CCP/EIS show clearly which roads we will keep open to the public and which snowmobile trails we now recognize. Leaseholders and owners of private land who do not otherwise have a right-of-way can request a special use permit to access their property if necessary.

Comment: Commenters who opposed snowmobiling on the refuge stated that it was incompatible due to its impacts on wildlife and the environment.

Response: We understand and appreciate those comments, and offer the following: Snowmobile trails on the refuge are located primarily on logging roads. We will work with the states and local clubs to relocate trails out of more sensitive areas, such as wetlands and deer wintering areas. We will allow snowmobiling only on designated trails (see final CCP/EIS chapter 2, alternative B, map 2–9). Those trails will be open only when their snow cover is sufficient for the use. We will monitor that use, and enforce regulations to ensure that it is conducted appropriately.

15.4 Off Road Vehicle Use [ATVs, UTVs, dirt bikes and other off-road vehicles not legal for highway use] (Letter ID#: 87, 152, 196, 592, 600, 631, 670, 690, 706, 712)

Comment: We received a few comments about the use of ORVs at the refuge. Most of them opposed it.

Response: We appreciate that support, and stand by our decision not to allow ORV use on the refuge. We discuss that decision in the final CCP/EIS, chapter 2, in “Actions Common to All Alternatives,” and in appendix C, in “Finding of Appropriateness for ORV Use.”

Comment: There was some limited concern that we would close four-wheel-drive roads.

Response: Please see our response in this document under “Access.”

Comment: We received some comments objecting to our having determined ORV use inappropriate.

Response: We did not see that those comments were specifically in support of ORV use, and have responded to them in a different section. Please refer to our response in this document under “Uses Determined Inappropriate.”

15.5 Hiking

(Letter ID#: 158, 726)

Comment: A few commenters supported hiking generally, stating that any recreation plan should include it, and that it would cause limited disturbance, because hikers would more likely be drawn to areas with more opportunities for hiking, such as the White Mountains.

Response: Hiking is not one of the six priority public uses of the refuge system. However, we will facilitate pedestrian travel on nature trails when it supports priority uses such as interpretation, wildlife observation, or photography. Please refer to the public use maps and the discussion under each alternative in the final CCP/EIS, chapter 2, goal 4. Maps 2–8 and 2–9 indicate the trails for alternative B, our preferred alternative.

15.6 Uses Determined Inappropriate

(Letter ID#: 20, 48, 50, 85, 90, 93, 107, 135, 138, 287, 318, 470, 476, 497, 513, 517)

Comment: Several commenters objected to our determining uses inappropriate. Some objected to being told that they could enjoy a specific use on public land, while others commented on the lack of reasons in our findings of appropriateness for why we found it inappropriate.

Response: The public use of the refuge is governed by state and federal laws, policies, and directives, including these.

- National Wildlife Administration Act of 1996
- Refuge Recreation Act of 1962, as amended by the National Wildlife Refuge System Improvement Act of 1997
- Executive Order No. 12996 of March 25, 1996
- USFWS Policy on Appropriateness of Refuge Uses
- USFWS Policy on Compatibility
- Executive Order No. 13443 (August 16, 2007), “Facilitation of Hunting Heritage and Wildlife Conservation”

Throughout the development of this final CCP/EIS, the core team was sensitive to the desire of the local populace to maintain certain public uses outlined in the 1991 EA establishing the refuge. The core team also desired to minimize additional regulations and align refuge-specific regulations as closely as possible with state regulations to avoid potential confusion whenever possible. Adopting state regulations wholesale was not possible, because federal laws sometimes require more stringent regulations than state laws do.

The Improvement Act requires the Service to manage refuges as a system of lands, not as individual field stations. In determining whether a public use is appropriate, the refuge manager must determine that it will not materially interfere with or detract from fulfilling the mission of the National Wildlife Refuge System or the establishing purposes of the refuge. The refuge manager also must consider whether it detract from or conflict with other allowable uses, whether current refuge staffing and funding are sufficient to support it, and its expected impacts on the refuge.

The draft CCP/EIS addresses the uses known to occur on the refuge and the uses brought to our attention during the public scoping process. The final CCP/EIS also considers the comments regarding additional public uses brought up during the public comment period for the draft CCP/EIS. We made several changes, which are reflected in appendix C, “Findings of Appropriateness and Compatibility Determinations.” We added two additional compatibility determinations: horseback riding and bicycling. We modified two additional compatibility determinations to incorporate public comment. We modified and renamed “Gathering of blueberries, black berries, and raspberries” as “Recreational gathering of blueberries, blackberries, strawberries, raspberries, fiddleheads, mushrooms and antler sheds.” We also modified the compatibility determination on snowmobiling to add the use of dogsleds on snowmobile trails, as allowed by state law.

The Service policy on appropriateness states, “the Refuge Manager will decide if a new or existing use is an

appropriate refuge use. If an existing use is not appropriate, the Refuge Manager will eliminate or modify the use as expeditiously as practicable.” We may include narrative discussions in a finding of appropriateness to record why we made the finding, but they are not required. We have reconsidered and found appropriate several of the uses people commented on for the final CCP/EIS.

Comment: One commenter claimed, “There are over 30 popular forest- and water-based recreation activities that are listed in the NH SCORP that are prohibited in the refuge, and if the refuge expands will dramatically reduce tourism and recreation participation in the local area and the North Country.”

Response: That comment overstates. Of the 35 outdoor activities listed in the NH SCORP, 12 would be allowable in the final CCP/EIS. That leaves 23 activities that we would not allow. Of those 23 activities, 4 do not apply at all to the area (ocean swimming, downhill skiing, camping in a national forest, and sea kayaking), leaving 19 activities that would not be allowed on the refuge. Those are available outside the refuge, and would not be affected by the expansion the final CCP/EIS proposes. Furthermore, we reconsidered our position on an additional five activities, leaving 14 activities available in the local area but prohibited on the refuge. Many of those 14 activities occur on the waters of Umbagog Lake, and are subject primarily to state regulation, (e.g., sailing, waterskiing, and lake swimming). Others require facilities that are inconsistent with the establishing purposes of the refuge, such as golf courses, tennis courts, or soccer fields.

We purchased the lands encompassed by the refuge for specific purposes in the National Wildlife Refuge System. The mission of the refuge system differs from other those of other government agencies, such as the National Park Service or Forest Service. We conducted a thorough public scoping, and considered all requests for specific public uses to be allowed in preparing the draft and the final CCP/EIS, and incorporated additional uses into the final CCP/EIS in response to public comment.

Comment: Others commented specifically about certain activities: dog sledding, berry harvesting, mushroom harvesting, fiddlehead harvesting, ORV use, horseback riding, mountain bike riding, and geo-caching.

Response: Please refer to our response to comments relating to ORV use in that section. We have reconsidered mountain biking, and have prepared a compatibility determination for bicycling. We will allow bicycling along designated routes of travel through the refuge. For their exact locations, please refer to final CCP/EIS chapter 2, alternative B, maps 2–8 and 2–9.

We also have reconsidered dog sledding, horseback riding, berry picking, mushroom picking, and fiddlehead picking, and have prepared compatibility determinations to allow them in certain areas, under certain stipulations. Our responses to comments on those activities follow in the next few sections. We also reconsidered geo-caching, but we stand behind our decision that it is not appropriate, since it involves the abandonment of property, and because the people who set up the caches might unknowingly enter sensitive habitats or disturb wildlife.

15.6a Bicycling

No specific comments received

15.6b Horseback Riding

(Letter ID#: 34, 110, 111)

Comment: Some comments asked us to allow recreational horseback riding.

Response: We asked the people who use the refuge and the proposed expansion area for horseback riding to describe where they ride in the area, at what time of year, and how often they rode. We reconsidered our position on horseback riding after evaluating the use and listening to those public comments. We used that additional information to prepare a compatibility determination allowing the use only on certain designated trails, with stipulations (see final CCP/EIS appendix C, under “Compatibility Determination for Horseback Riding”). We will allow a trail that permits people to ride from Upton, Maine, to Errol, New Hampshire. The current level of that use at this time does not materially interfere with or detract from the fulfillment of the

mission of the refuge system or the establishing purposes of the refuge. We will monitor its level over time, and re-evaluate it if it increases significantly.

15.6c Berry Harvesting

(Letter ID#: 108, 147, 164, 468, 174)

Comment: People who commented on berry harvesting opposed restrictions on the amounts and types of wild foods they could pick on the refuge. A few requested that we open the refuge specifically for picking cranberries.

Response: After considering public comment on this subject, we completed a compatibility determination for the “Recreational Gathering of Blueberries, Blackberries, Strawberries, Raspberries, Mushrooms, Fiddleheads, and Antler Sheds.” That compatibility determination proposes to open the refuge for gathering them for personal use and consumption, with stipulations to ensure compatibility. We recognize that people have gathered those native materials for many years, and acknowledge that it fosters a connection to and appreciation of the area’s natural resources. The fields along Pond Brook Road fall under special regulations. Please refer to final CCP/EIS appendix C, under “Compatibility Determination for Recreational Harvesting of Blueberries, Blackberries, Strawberries, Raspberries, Fiddleheads, Mushrooms, and Antler Sheds.”

This use frequently occurs with other uses. Its levels are relatively low. Furthermore, the compatibility determination does not limit the harvest to a specific amount, but stipulates that the materials will be gathered for personal, not commercial, use.

The current level of this use at this time does not materially interfere with or detract from the fulfillment of the mission of the refuge system or the establishing purposes of the refuge. We will monitor the level of the use over time, and re-evaluate it if it increases significantly.

Harvesting cranberries is prohibited to avoid impacts on wetlands (see final CCP/EIS appendix C, under “Compatibility Determination for Recreational Harvesting of Blueberries, Blackberries, Strawberries, Raspberries, Fiddleheads, Mushrooms, and Antler Sheds”). One of the purposes for establishing the refuge was “the conservation of the wetlands of the Nation in order to maintain the public benefits they provide and to help fulfill international obligations contained in various migratory bird treaties and conventions....” (Emergency Wetlands Resources Act of 1986, 16 U.S.C. 3901(b)) That purpose places a high emphasis on conserving the wetland habitats of the area. Cranberries grow in some of the most sensitive of the refuge wetland systems, and allowing this use raises the potential for damage to those habitats. Therefore, this use could materially detract from or interfere with the establishing purpose of the refuge. It will remain closed to cranberry picking.

15.6d Dog Sledding or Mushing

(Letter ID#: 107, 199, 381)

Comment: Comments regarding dog sledding were grouped largely with other non-motorized uses and arguments against the regulation of public use. Specific comments concerned the refuge’s geographical position in relation to key access points and routes.

Response: After carefully considering the public comments and the potential impact on wildlife during the winter months, we reconsidered our position on dog sledding, and have amended the snowmobile compatibility determination to allow dog sledding on snowmobile trails as state law allows. We will allow dog sledding on designated, mapped snowmobile trails, as long as those trails are located away from deer wintering areas, wetlands, or other resources of concern (refer to final CCP/EIS appendix C, under “Compatibility Determination for Snowmobiling”). We will not allow new trails or off-trail use. The use will be during daylight hours only, and no camping will be allowed.

Comment: Other comments focused on guided dog sledding and the impact shutting down dog sledding would have on a local business and the local economy.

Response: We have met with, and will continue to meet with, the owners of the Mahoosuc Guide Service, who

established a business in the area with separate trails and winter campsites on the refuge and in the surrounding area before we purchased the property for the refuge. Dog sledding in sensitive habitat areas, especially when combined with winter camping, has the potential to affect wildlife. Many wildlife species are especially sensitive during the winter. We recognize that abruptly cutting off access would be detrimental to that business. Considering this was an existing use, and to be consistent with refuge campsites and camp lot leases, we will accommodate this use through our current lease program with a term not to exceed 15 years. This lease will provide the leaseholder with exclusive use of certain trails and campsites on the refuge during the dogsledding season.

15.7 Other Non-motorized Recreation

(Letter ID#: 91, 163, 167, 172, 173, 199, 230, 233, 240, 274, 321, 336, 347, 348, 359, 428)

Comment: Comments generally advocated setting aside areas of the refuge for quiet, non-motorized recreation.

Response: This document discusses several forms of non-motorized recreation, under the sections “Access,” “Other Public Uses,” “Remote Camping,” “Boating,” “Hiking,” “Uses Determined Inappropriate,” “Horseback Riding,” “Berry Harvesting” and “Dog Sledding.” Please refer to those sections for relevant comments and responses. Excerpts follow.

Although designated wilderness areas would have restrictions on motorized use, a wilderness review of the refuge found that the refuge lacks large contiguous blocks of land suitable for wilderness designation (see final CCP/EIS, appendix D, “Wilderness Review”). However, non-motorized recreation is the only available means of travel on smaller areas without roads on the refuge. Visitors who want to see the refuge under their own power might find satisfaction in those areas.

We considered the public comments on the draft CCP and, in response, prepared three additional compatibility determinations in the final CCP/EIS to address non-motorized recreation: horseback riding, bicycling, and pedestrian use (hiking, cross-country skiing and snowshoeing). Please refer to appendix C, “Compatibility Determinations.”

16.0 Appendixes

(Letter ID#: 352)

Comment: One commenter found that some of the bird and mammal species the draft CCP/EIS lists in appendix B, “Species and Habitats of Conservation Concern Known or Suspected on the Refuge,” were characterized incorrectly as to their status, and information on reptiles was missing.

Response: We thank that commenter for the detailed review of that table. Most of the species are listed as state species of concern under the columns “New Hampshire Wildlife Action Plan” or “Maine Comprehensive Wildlife Conservation Strategy,” final CCP/EIS appendix B. However, we have tried to clarify appendix B by adding an “SC” (species of concern) designation, where appropriate, under the State Legal Status columns. Please note that the state species of concern designation is an administrative category only. We also made the editorial changes suggested regarding white-tailed deer and reptiles.

Comment: One commenter took issue with statements related to “best management practices” for trapping in the draft CCP/EIS, appendix C, under “Compatibility Determination for Furbearer Management.”

Response: Please refer to our response in this document under “Furbearer Management.” In summary, we propose to postpone our decision to allow furbearer management, including the possibility of trapping, until we can conduct further analysis and prepare a more detailed furbearer management plan. We would do that in a separate environmental assessment, with a separate public comment period. We propose that change for both alternatives B and C, and included it in chapter 2 of the final CCP/EIS, under “Actions Common to Alternatives B and C Only.”

17.0 Comments Considered Out of Scope

(Letter ID#: 352, 417, 453, 706)

Comment: One commenter asked questions related to state fish and wildlife planning. Another sent us an opinion on eco-feminism. A third wondered if we were considering the scenic landscape when we evaluated and proposed our land protection plan. They expressed concern about the development around Umbagog Lake, and encouraged us to protect its imposing scenic prospects.

Response: Neither of the first two comments relates to CCP planning and, therefore, both are outside the scope of this document. In response to the comment about protecting the scenic vista, we recognize that as a secondary benefit of our land protection. Although our mission and our first priorities are to protect and conserve lands with high wildlife resource or habitat values, we are pleased to hear that people realize our land protection plan produces other benefits, such as protecting imposing prospects and maintaining public access or the rural quality of life.

Attachment 1

Letter Number	Name
1	Judith Tilli
2	Lyman Pope Jr.
3	Tim Beaucage
4	Tim & Margaret Ellis
5	Jennie M. Bemier
7	Raymond S. Burton
8	Lynn Spiegall
9	Louise C. St. Onge
10	Ned Mcsherry
11	Kate Williams
12	Rosemary A. Gossfeld
13	Linda Rauter
14	Mike Fehlberg
15	Kate Stern
16	Carleton Schaller Jr.
17	Laura Slitt
18	Joan Riemitts
19	Raynold & Shirley Savage
20	Gerard Chabot
21	Douglas J. Deangelis
22	Marc Giroux
23	John W. Coormier
24	Donna Glover
25	Theodore V. Baillargeon
26	Dianne Fallen
27	Kate Demers
28	Patricia Stolte
29	Alma Blackwelder
30	Bob Meyers
31	Norman W. Demers
32	Mr. & Mrs. Lawrence Davis
33	Julie Ruel
34	Nancy Thew

Letter Number	Name
35	Dianne Littlehale
36	J. Capozzelli
37	Monica Engebretson
38	Nancy Nelson
39	Charlene O'brien
40	Virginia Williamson
41	Linda Rusin & Wayne Jacques
42	John Gallus
43	Kenneth F. Lanzillo
44	Joyce Littlefield
45	H. Lenz
46	Joel Freedmain
47	Charles Chalk
48	Ray Hopkins
49	Barbara Bonsignore
50	Lori Bailey
51	Timothy Bailey
53	J. Totty
54	Audrey E. Robinson
55	Alexandra Muffat
56	John J. Maloney
57	Jeannine Brunelle
58	Helane Shields
59	Jim And Cindy Calyer
60	Bill Bonney
61	Jared Teutsch
62	Wesley F. Hamilton
63	John And Jean Holt
64	Maurice A. Cyr
65	Ann D. Cyr
66	Denise Pearl And Vincent Zito
68	Larry J. Nelson
69	Susanne Nelson

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
70	Wayne Valliere
71	Steve Wingate
72	Peter Bilodesh
73	Linda Valliere
74	Jenn Curtis
75	Gertrude Greenwood
76	Raymond A Cyr
77	Kevin Edward Maloney
79	Joan J. And David B. Miller
80	Emery Cameron
81	David L. Willcox
82	Bill Maloney
83	Roland And Linda Picard
84	Marion Maloney
85	Susan Dupuis
86	James Mitchell, Executive Director
87	David Houghton
88	Richard G. Sytek
89	Edna Williams
90	James Rector
91	Leanne Klyza Linck
92	John Cronin
93	Polly Mahoney & Kevin Slater
95	Mike Macdonald
96	Bill Bryant
97	Pat Bryant
98	Andrew Page And Pierre Grzybowski
99	Donald S. Clarke
100	Richard A. Minard, Jr.
101	Mark Stadler
102	Michael D. Cyr
103	Lewis Parker
104	Raynold & Shirley Savage
105	Phyllis J. Baillargeon

Letter Number	Name
106	Mary Crescini
107	Norman Mercier
107	Normand Bergeron
107	William Altenburg
107	Charlie Kurtz
107	Paul Grenier
107	Irene Foster
107	Dan Roberge
107	Bryan Lamirande
107	Adam Mclain
107	Eddie Deblois
107	Robert T. Folsom
107	Karen Brown
107	Jim Silverberg
107	Jennie Bernier
107	Dona Larsen
107	Dave Miller
107	Barry Kelley
107	Mike Dubose
107	Bill Bryant
107	Jim Grant
108	Sean Mccormick
108	Lori Brown
108	Jennie Bernier
108	Alita Rioux
108	Brian Wentzell
108	Joe Bernier
108	Robert T. Folsom Sr.
109	Ann Blake
109	Leslie Jose
109	Gene Martin
109	Bonnie Eames
109	Linda Dionne
109	Fred Shepard

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
109	Stan Wentzell
109	Susan Fournier
109	Laura Slitt
109	Carolyn Scarinza
110	Norman Demers
110	Lionel Roy
110	Leo Boisselle
110	Ray Hopkins
110	Karen Brown
110	Dan Roberge
110	Robert T. Folsom
110	Lisa Dell'amico
110	Glen Eastman
111	Joanna Reese
111	Joe Bernier
111	Robert T. Folsom Sr.
111	Joy Heywood Yarnell
111	Michael Parshall
111	Nancy Thew
111	Kevin Slater
111	Dave Bonney
111	Gary Bilodeau
112	Philip Bryce
113	Janet Keleher
114	Barbara Evans
115	Dennis Fernandes
116	Dennis & Peg Kelly
117	Ovide M. Lamontagne, Esquire
118	F. Allen Wiley
119	H. Franklin (Terry) Irwin
120	Beth Brazil
121	Kate Hartnett
122	Linda Dionne

Letter Number	Name
124	Hope Haff
125	Bonnie & Chester Eames
126	Kenneth And Sarah Kimball
127	Ted Bergeron
128	Henrietta List
129	Philip Bryce
130	Katharine Eneguess
131	Belinda Pillow
132	John Snyder
133	Nancy Perlson
134	Reggie Hall
135	Karen Brown
136	Jeff Fair
137	Ken Hotopp
138	Bill Altenburg
139	Kevin Bernier
140	Seth Mcelhinney
141	Tracy Gregoire
142	Eric J. Kronk
143	Peter L. Oliver
144	Charles F. Dorn
145	Patrice Cole
146	Deborah Bloomer
147	David Picard
148	Cherie
149	Jane Difley
150	Ed Germain
151	Marcel Polak
152	Doug Bechtel
153	Gail Kilkelly
155	Sean Mccormick
156	Timothy S. Dow
157	Kate Power

Letter Number	Name
158	Thomas Van Vechten
159	Jeffrey T. Aceto
160	Heather Cameron
161	Cindy Glenn
162	Rebecca Wish Gelfand
163	Carol Felice
164	Bruce Bean
165	B. Macdonald
166	Beth Mccarthy & James Alt
167	Mike & Carolyn Wurm
168	Mary Dawson
169	Katherine Reichert
170	Mark Goodreau
171	Lisey Good
172	Alan Savenor
173	Melanie Mccrea
174	Michael Macdonald
175	Timothy Gershon
176	Peter Demers
177	Valarie Peck
178	Kevin Reid
179	Mark Allen
180	P. T. Withington
181	Tova Cohen
182	Kim Demers
183	Dominique Coulombe
184	Edward Walworth
185	Timothy Sharpe
186	Clarissa Bronson
187	Larry Young
188	Geoff Young
189	Bob Goldman
190	Paul Cunha

Letter Number	Name
191	Stephen Karpovich
192	Roger Stillwater
193	Whit Hamnett Ii
194	Adele Franks
195	Elaine Fearnley
196	Rick R. Covill
197	Roger Mann
198	John L. Cronin
199	Susan Arnold
200	Harry Vogel
201	Per Hjerppe
202	Jane Winn
203	Linda O. Smith
204	Ay
205	Leslie Fraser
206	Scott Taylor
207	Martha Bauman
208	Roger & Ann Sweet
209	Mary Graham
210	Mark Dewar
211	Paul Anders
212	John Nelson
213	Richard Frenkel
214	Stephanie Parkinson
215	Dr. W. L. Chapkis
216	Mary Langevin
217	Andrew W. McClaine
218	Tim Zimmerer
219	Bruce Scofield
220	Kelly Rossiter
221	Susan Franconi-Salmon
222	Scott Olsen
223	John Ciampi

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
224	Jeff Fullerton
225	Fred Snell
226	Nancy Martin
227	Otto Judicke
228	Jim Allmendinger
229	Carol Warren
230	Betsy Hall
231	Lynn Costello
232	Roger And Susan Shamel
233	Scott Camlin And Beth Uptegrove
234	Robert French
235	Alfrieda & Robert Englund
236	Matt Clarke
237	Don Borenstein
238	Nora Shine
239	Peter Doherty
240	Daniel Heyduk
241	Sgt Jason Longval
242	Doug Chamberlin
243	Tom Flannagan
244	Gregory & Catherine Moser
245	Michael C. Donovan
246	Betsy Higgins
247	Alice Roberge
248	Benjamin Pignatelli
249	John H. Stevens
250	Barbara A. Robbins
251	Cynthia Smith
252	Paul C. Johnson
253	Yvonne Federowicz
254	David A. Allen
255	John P. Sherwood Jr.
256	Thomas S. Mcandrews

Letter Number	Name
257	Alan E. Lutz
258	Robert Loranger
259	Tom Haslett
260	Bob Mazairz
261	Herman Deyette
262	Edward B. Wetherill
263	Patricia Butler
264	Jeanne Mcdermott
265	Stuart Russell
266	Michael Herlihy
267	John Slonina
268	Jay Pendexter
270	Claire Lupton
271	Patricia Thatcher
272	Allen Katzoff
273	Doug Chamberlin
274	Rebecca Jackson
275	Randy Deary
276	Mike Blackwell
277	Ray Theberge
278	Robin Holske
279	Charles Powers
280	Brian J. Premore
281	Diana Laurenitis
282	Paul J. Glatkowski
283	Steven Given
286	Roger Stillwater
287	Tim Akers
288	Thomas R. Palladino
289	Staci Whitcomb
290	Cathy Anderson
291	Cara Sanford
292	Katherine Eneguess

Letter Number	Name
293	Susan Fredette
294	Robert C. Pantel
295	Kevin C. Smith
296	Bill Mckenney
297	Bruce Hamilton
298	Kent J. Schreiner
299	Samantha Houlihan
300	Steven Angel
301	Edwin Mccarthy
302	Caitlin O'neil
303	William Moss
304	Robert Pickard
305	Chris Martin
306	Maryann Lacey
307	Michael Dubose
308	David Govatski
309	Mary & John Berry
310	David Bishop
311	Janet N. Krueger
312	Patrick Macqueen
313	Jim Mckeehan
314	Jean Slepian
315	Sharon Miller
316	Caroline Bogart
317	Louisa Dell'amico
318	Carolyn Mills
319	Kathryn Taylor
320	Ray Cyr
321	J. Barrie Billingsley
322	Linda Dionne
323	Mark Whitehill
324	Doug And Candy Armstrong
325	Beverly R. Reed

Letter Number	Name
326	Betsy Whitmore
327	Ms. Ella Oblas
328	Diana Marmorstein
329	Jessica Troisi
330	Mike Parshall
331	Laura Beth
332	Lindsey Fong
333	Rina Deych
334	S. Johnson Family And Friends
335	Evelyn Kimber
336	E. H. Roy
337	Charles Adkins
338	Elizabeth Meid
339	Scott Efland
340	Scott Stoner And Denise Hackert-Stoner
341	Robert & Carol Fournier
342	Mary S. Reed
343	Nancy A. Macgowan
345	Ms. Ernest Kight
347	Tony Owens
348	David Potter
349	Danielle Myers
350	Darrylin Gladstone
351	Martha Vanderwolk
352	Suzanne Fournier
353	Ann Bearce
354	Kevin Boto
355	Pat Tate
356	Karen Bill
357	C.B. Idhavetakillya
358	Brad Bergeron
359	Susan Bernard
360	Peter Glover

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
361	Linda Serfass
362	Kevin Jerram
363	Richard A. Graham III
364	Diana Littlehale
365	Dee Phlox
366	Ginny Smith
367	Richard B. Stewart
368	Steve Frye
369	Patricia Spinazzola
370	Nancy And Jim Silverberg
371	Jacqueline Gambarini
372	The Lawrence Family
373	Alexandra Moffat
375	Paul Bohan
377	Ksl
378	Anne Schulze
379	Jackie Perra
380	Susan Burnside
381	Bryan Courtois
382	Lindsey Fong
383	Rick & Tami Trowell
384	Ruth Ward
385	Gerry Theriault
386	Wayne R. Urso
387	Will Tuttle
388	Kristin Krause
389	Brennan Browne
390	Alexandra Moffat
391	Laura Slitt
392	Peter Garrett
393	Deborah Bloomer
394	Steve Schley
395	Richard Taylor

Letter Number	Name
396	Lars Jansson
397	Addie Ann Lambarth
398	Kathy Ratcliffe
399	Doug Chamberlin
400	J D Wilkinson
401	Paul D. Manganiello
402	Michael Mccann
403	Bethann Mccarthy
404	Karen Dearborn
405	Robert Silvernale
406	Cathy Chaffee
407	Scot Drysdale
408	Paul Grist
409	Dana Rickerich
410	Brenda Lind
411	Peter Fischer
412	Charles A. Powers
414	Jay Boynton
415	Ted Johnson
416	Barbara Badgley
417	David Elvin
419	Daniel J. Rutledge
420	Chester D. Eames
421	Tom Bergeron
422	Laurie Colbath-Libby
423	Eric & Tracy Lipsitt
424	Kevin Flynn
425	Pete Richardson
426	Verne Kaminski
427	Ralph C. Pisapia
428	Ruth Reeve
429	Eric Stirling
430	Barbara & Don Carey

Letter Number	Name
431	Pat Wilczynski
433	Karen Barker
434	Stephanie Sheridan
435	Peter T. Hansen
436	Rich Collins
437	Gary Lowe
438	Ben Gayman
439	Stewart Strachan
440	Barbara Bernsten
441	Clif And Jean Andreasen
442	Leslie Peabody
443	Loni Brown
444	Uwe Zimmermann
445	Michael Glines
446	Emma Crane
447	Jay Collier
448	David S. Brown, Esquire
449	Darlene Pike
450	Sheila Butler
451	Kirk G. Siegel, Esq.
452	Susan Thopson
453	Doug Armstrong
454	Jason Little
455	B. Sachau
470	John R. Larrivee
471	Jonathan Morneau
472	Richard A. Morneau
473	Maralle Marcussian
474	Edward J. Mallet
475	David W. Gauthier
476	Joan Koster
477	Karen Coffey
478	Kathrinz Cullinanz

Letter Number	Name
479	Clarence H. Lapworth
480	Domenic J. Pustizzi
481	Bobby Hodge
482	Karen S Fiedler
483	Joseph E. O'Neill
484	Ellen C. O'Neill
485	Dawn O'connel
486	A. B. Colter
487	Mark Marcussian
488	Robert Bowles
489	Robert Shalline
490	Karen S. Fiedler
491	Louis Kish
492	Joan L. Kish
493	Renee Pustizzi
494	Susan Marcussian
495	Edward L. Kelly III
496	Ellen M. Bowles
497	Gail S. Purdy
498	Remington J. Purdy
499	Richard Boisvert
500	Anthony Hamboyan
501	Robert Cleary
502	Patricia Riemitis
503	Edward J. Riemitis
504	Ronald Pouliot
505	Marie Pouliot
506	Flyod B. Lever
507	Kristen Sweet
508	Cliff Wentworth
509	James St. Martin
510	Jack Daigle
511	Romeo O. Binette

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
512	Gary St. Martin
513	James White
514	Gary Koster
515	Nancy Dwyer
516	John Koster
517	R. Lawrence
518	Richard Eckberg
519	Donald F. Kaplan
520	Julie Deminico
521	Eric Deminico
522	Don Nett
523	Pamela King
524	Michael King
525	Richard Conroy
527	Ken Ross
528	Alan Savenor
529	Bruce C. Scofield
545	Ed Germain
550	Jim Lambert
575	Bart Hague
576	Daryl Hahn
577	Mr. & Mrs. David Daniels & Jodee Davidson & Jane Davidson
578	Peg Lang
579	Bryan Wells
580	Sylvia Niznik
581	Ken Crowell
582	Heidi Ellrich
583	D. Gordon Mott
585	Becky Kendall
586	Thomas Fallon
587	Sonia Godbout
588	Evelyn Defrees

Letter Number	Name
589	Anne Kinney
590	Gabrielle Burton And Family
591	Daphne T Stevens
592	Jake Hodie
593	Christopher Lish
594	Christopher Lish
595	George W. And Lory Frame
596	Mark Hodie
597	David Addison
598	Alan Bennett
599	Ariane Staples
600	Leigh Webb
601	Ivan Linares
602	Simon Validzic
603	Genna Tudda
604	Mel Dickerson
605	Christine Coggins
606	Elizabeth Cziffra
607	Eddie Konczal
608	Thomas Sherry
609	Derek Williams
610	Richard Van Aken
611	Dawn White
612	Jami Trager
613	Bennett Winsor
615	Ragen Tilzey Cpa
616	Val Marjoricastle
617	Gary Krumwiede
618	Cathy Geist
619	Jason Goldsmith
620	Toni Siegrist
621	L.M. Burns
622	Robert M. Mcdowell

Letter Number	Name
624	Katherine Bowman
625	Ann Carter
626	Terry Burns
627	Lauren Chiong
628	Wanda Ballentine
630	K.D. Richardson
631	Leonard Greenhalgh
632	Richard Jackson
633	Lori Melena
634	Letitia Langord
635	Steve Brunelle
636	Henry Ickes
637	Kathleen Petty
638	Peggy Gilges
639	Rick Panozzo
640	Carlene Petty
641	Emily Obrien
642	Richard Pine
643	Lesley Smith
644	Molly Erickson
645	Doug Deaton
646	Ted Von Hippel
647	Natalie Reid
648	Laurel Macinnes
649	Michael Powell
650	Katherine Hagaman
651	Suzanne Lefebvre
652	Paul Nelson
653	Keith Miller
654	F Hammer
655	Eamon Holmes
656	William Davis
657	Allen Alexander

Letter Number	Name
658	Karen Kimbrough
659	Judy Cole
660	Doug Bruce
661	Elizabeth Burke
662	Elsa Voelcker
664	Stephen And Adrienne Osborn
665	Frank Baucom
666	Phillip Hult
667	Carleton Kinney
668	Kris Smith-Lavoie
669	Sama Blackwell
670	Peter Tafuri
671	Lyn Henri
672	Chris Medonald
673	William Anderson
674	Mary Martin
675	Heather Cabal
676	G. Guyton
677	Richard Peake
678	Marvin John Sheffield D.V.M.
679	Cathy Brunick
680	Margaret Sawyer
681	Judith Castiano
682	Richard Joste
683	Sandra Couch
684	John Hinnant
685	Carolyn Lawler
686	James Sorrells
687	Jonathan McIntire
688	David Mc Intosh
689	Rose Bellamy
690	Staci-Lee Sherwood
691	Kate Fielder

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
692	Susan Chandler
693	Dave Robinson
694	Susan St Peter
695	Ruth A. Carter
696	Richard Dimatteo
697	Chris Jacobs
698	Holly Eaton
699	Deborah Uhlman
700	Charles Crotty
701	Laurie Bonham
702	Linda Seifried
703	Jeanne Wheeler
704	Yuko Nakajima
705	Ryan Pulis
706	John Savlove
707	Ms.Ernest Kight
708	Eric Eilerman
709	Mia Zebouni
710	Pat Collier
711	Heidi Rood
712	Charles Daly
713	Ms. Carlene Meeker September 1
714	K. Turner
715	Sissy Riffin
716	Kelly Vresilovic
717	Norm Wendell
718	Richard Curtis
719	Jo Knox
720	Bill Tower
721	Dick Artley
722	Todd Cheek
723	J
724	Brian Glover

Letter Number	Name
725	Jean Wright
726	Tony Owens
727	Tim Atwater
728	Janet Decker
729	Lois Tutino
730	Charles Rogers
731	Donna Bruns
732	James Lukas
733	Charles Rinehart
734	Douglas Fowley
735	Elizabeth Moreno
736	Mark Durussel
737	Binell Martino
738	Sharon Morris
739	Ellen Honey
740	Irene Radke
741	Michael Chapdelaine
742	Eugene Craig
743	J Bogan
745	Karen Porter
746	Priscilla Stanley
747	Patricia Morgan
748	John Schultz
749	Elisabeth Sackton
750	Margaret Hubbert
751	Olive Wilson
752	Annie Grieshop
753	Jim Steitz
754	Shirley Napps
755	Isabelle Jolly
756	Charles Rapport
757	Valerie Zachary
758	Larry Mabry

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
759	Rhianna Brandt
760	Jamaka Petzak
761	Jack Stansfield
762	David Walker
763	James Smith
764	Charles Yankel
765	Amy Stoller
766	Susan L D Shamblin
767	Kate Deangelis
768	Scott Drummond
769	C A Gaidos
770	Phil Crabill
771	Jill Singer
772	Richard Jackson
774	Theresa Siskind
775	Bernadine Wessel
776	Bob Brister
777	Carol Jules
778	Bethany Barry
779	Skye Patterson
780	Thomas Aldridge
781	David Gignac
782	H Thomas Blum
783	Steve Robey
784	Thomas Appich
785	Herbert Wilson
787	Durango Mendoza
788	Ian Campbell Cree
789	Ananda Floyd
790	Danielle Myers
791	Rodney E Cook Sr
792	Wanda Helms
793	Amelia Trader

Letter Number	Name
794	Paul Grove
795	Fritz Milas
796	Richard Yang
797	Lawrence Smith
798	Jo-Shing Yang
799	Daniel Noel
800	Jean Grace
801	Andrew Lenz
802	Jean And James GENASCI
803	Nancie Pike
804	Patricia Smith
805	Judy Stettner
806	Harold Jesse
807	Tony Cheng Yang
808	Marilyn Britton
809	Gerrit Crouse
810	Billy Klock
811	Wendy Ebersberger
812	Susan Allen
813	Ronald Harden
814	Isabel Gray
815	Susan Wrightsman
816	Mary Gillett
817	Deborah Smith
818	Angel Robinson
819	Frances Schwartzwald
820	Marie Plante
821	Ben And Karen Mcclinton
822	Harald Conradi
823	Sara Bhakti
824	Sylvie Henning
825	Tom Hocter
826	Suchitra Patton

Summary of Public Comments and Service Responses on the Draft CCP/EIS for the Lake Umbagog NWR

Letter Number	Name
827	Ruth Bleyler
828	Charles Fina
829	Adriana Faraldo
830	Lilia Hughes
831	Rob Jankowski
832	Maggie Hauck
833	Mary Markus
834	Sam Asseff
835	Janet Curtis
836	Brandi Gartland
837	Elizabeth Cannon
838	Deborah Filipelli
839	Frank Millin
840	Pace Pace
841	Gerald Rilling
842	Geoffrey Gibbons
843	Walter Lee Iv
844	Vince And Sandi Vanacore
845	Aloysius Wald
846	Frederik Copithorn
847	Nick Sabetto
848	Jeanne Turgeon
849	C.Diane Macaulay
850	Patty Livingston
851	Robert Sylvester
852	Colleen Theriot
853	Sierra Lund
854	Kurt G Gubrud
855	Lydia Crumpacker
856	Jan Garton
858	David Beaulieu
859	Caroline Damon
860	Susan Dwyer
861	Sherry Arnold

Letter Number	Name
862	Kathryn Rose
863	Eileen Arena
864	Kristjan Gunnarsson
865	Phyl Morello
866	Gail Krueger
867	James Flanagan
868	Marylynne And Teddye
869	Saran Kirschbaum
870	Sharon Cozzette
871	William Drake
872	Scott Sobel
873	Catherine Cushing
874	Maury J. Heiman III
875	Claudia Damon
876	Cheryl Thacker
877	Terry McClellan
878	Eric Staples
879	William Belknap
880	Gene Ankli
881	Dr. John M. Stewart Emeritus Professor And Director
882	Betty Ferrero
883	Elizabeth D. Kirk
884	Annette Kaohelaulii
885	Maureen Shearer
886	Dr. Jeffrey Paul Lagasse M.D.
887	Phyllis Donovan
888	Linda Hayes
889	Ellen Perez
890	Mara Chaiken
891	Elinor Osborn
892	David Harrison
894	Serena Carbone
896	Jill Fischman

Letter Number	Name
897	Carol Gray Kennedy
898	Ann G. Bearce
899	Sue And Wil Bernard
900	Sara Ross
901	Laura Johnson
902	Helen Rayshick
903	Steven Rayshick
904	Lisa Clayton
905	Cynthia Huspeka
906	Joseph Cox
907	Tom Mcgann
908	Monica Ball
909	Kari Olsen
911	C Clark
912	Virginia Johnson
913	Robin Rae Swanson
914	A.E. White
915	Mary Gargiulo
916	Victoria Lovell
917	Sheela Ram-Prasad
918	Nancy Shinn
919	Laurie Sardinia
920	Marilyn Glasgow
921	Gloria Feldscher
922	Deb Kovacs
923	Jeanette Holmgren
924	Marian Hussenbux.
925	Dick Artley
926	Kathy Himmer
927	Mary Hadcock
928	Susan And Hubert Van Asch Van Wyck
929	Simon Validzic