

Chapter 7: Comments on Draft Environmental Impact Statement and Service Responses

This appendix contains copies of the comments received on the Draft Environmental Impact Statement (DEIS) and the Fish and Wildlife Service's (Service) responses to these comments.

Approximately 156 copies of the DEIS summary and 87 copies of the DEIS were mailed based on the distribution list (Chapter 6) and upon request. A letter (see page 96) inviting comment was also sent along with the summary to 81 landowners who adjoin Refuge lands or who have species listed under the Endangered Species Act occurring on their land. Each DEIS summary contained information on how to obtain a copy of the DEIS.

The Service made the DEIS available for a 60-day public review period from May 18 through July 22, 2005. During this review period, four public meetings were held in Decorah, Elkader, and Peosta, Iowa and LaFarge, Wisconsin. Thirty-three people attended.

Comments at the public meetings were recorded on a flip chart and a comment sheet was provided to encourage and facilitate additional written comments (see page 97). Twelve comment letters or emails were received during the public review period. Each comment document is reproduced in this Appendix and assigned a number. The Service responses follow. The numbers in the top margin of the comment letters correspond to the matching numbers in the response section.

Participant comments from public meetings:

1. Support for Refuge expansion
2. Consider other deer hunting options to control herds such as special hunts
3. Study algalic slopes, impacts of global warming
4. Use volunteer support, especially for education and tours
5. Prevent impacts from pesticides, soil erosion, etc., protect sinkholes
6. Support for protection of sites with species of concern
7. Limit public use
8. Concern over further government land acquisition, lack of taxes
9. Coordinate with county land plans where they exist

Response to above comments:

Public meeting attendees generally supported acquisition of small, scattered tracts from willing sellers. Localized opposition or concern with Refuge land acquisition seems to be a result of past history with the government or existing government ownership in some areas. The impact of acquisition on taxes is discussed in Section 4.7.3 of the EIS. We include local governments on our mailing list and will continue to coordinate with them in planning or Refuge management projects when appropriate.

We will consider special hunts for deer or other species where they are adversely affecting habitat or listed species. This strategy has been added to the species management goal and the hunting compatibility determination.

More study of algific talus slope habitat is proposed in the plan under the habitat goal. Language regarding the potential impacts of global warming is addressed in section 4.2.4. We also added a strategy to objective 2, species management goal regarding climate change.

We addressed the use of volunteers in the Visitor Services goal as strategy 14 and in Chapter 5, Plan Implementation in the draft EIS. We believe volunteers can provide valuable assistance to Refuge programs. We also recognize that staff is needed to manage volunteers and propose to share a park ranger with Upper Mississippi River NWFR, McGregor District for that purpose (strategy 9, visitor services goal).

The goal of land acquisition is to protect the entire algific slope system that requires sinkholes and buffer areas from the impacts associated with land uses on adjacent property. When there are not willing sellers for some portions of the system, we propose to work with willing landowners through the Service's Partners for Wildlife Program, USDA programs, or other private lands assistance to resolve erosion or chemical runoff issues into sinkholes or onto Refuge lands.

The aim of protecting sites that do not contain endangered species, but do contain Service species of concern (species facing threats but not warranting listing at this time), is to prevent future threatened or endangered listing status by removing the threats to these species and their fragile habitat. Algific talus slopes contain a broad community of rare plants and animals that require protection to maintain or increase existing populations.

Public use would be allowed only with certain conditions to ensure protection of endangered species habitat from disturbance. Those conditions are: large enough acreage to provide recreation and buffer around the algific slopes, adequate access to the unit, adequate law enforcement, and monitoring of public use.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Driftless Area National Wildlife Refuge

PO Box 460

McGregor, Iowa 52157

563-873-3423



*Celebrating a
Century
of Conservation*

May 18, 2005

Dear Landowner:

You are receiving this letter because you own property adjacent to the Driftless Area National Wildlife Refuge or you have endangered species on your property. You have likely been contacted in the past by Refuge staff. The Refuge was established in 1989 for the permanent protection of the federally endangered Iowa Pleistocene snail and threatened Northern monkshood plant. The Refuge is seeking public comment on a 15-year management plan that includes additional land acquisition in northeast Iowa, southeast Minnesota, southwest Wisconsin, and one site in northwest Illinois. A summary of the plan is enclosed.

We would like to hear from you. We can send you a copy of the plan and environmental impact statement if you desire to review it, or there will be public meetings at the following locations. The comment period is 60 days ending July 22, 2005. Please contact Cathy Henry at the above address or phone number if you would like further information.

- June 2 6:30-8:30 Elkader, IA Central State Bank drive-up building, 200 N. Main
- June 7 6:30-8:30 Decorah, IA Decorah Public Library, 202 Winnebago St.
- June 8 6:30-8:30 Pocahontas, IA Swiss Valley Nature Center, 13606 Swiss Valley Rd.
- June 15 6:30-8:30 LaFarge, WI Kickapoo Valley Reserve Visitor Center, S. 3561 Hwy 131

Sincerely,

John Lindell
District Manager

**Driftless Area National Wildlife Refuge
Draft Environmental Impact Statement and Comprehensive Conservation Plan 2005**

Comment Form

Please mail comments to: Driftless Area NWR Attn: CCP Comment

PO Box 460, 401 Business Hwy 18N

McGregor, IA 52157

Comments may also be sent through the following website:

<http://www.fws.gov/midwest/planning/DriftlessArea/index.html>

(Phone 563-873-3423 for further information)

Comment number 1



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Scott Humrickhouse, Regional Director

3550 Mormon Coulee Road
La Crosse, Wisconsin 54601
Telephone 608-785-8000
FAX 608-785-9990
TTY Access via relay - 711

July 28, 2005

Kathy Henry
U.S. Fish and Wildlife Service
401 Business Highway 18N
P.O. Box 460
McGregor, IA, 52157

8/5/05
Received
John
Clyde
Dale
Cathy
Tim
Neil
Jim
Colin
Peter
Nick
File

Subject: Draft Review of Driftless Area National Wildlife Refuge EIS/CCP

Dear Ms. Henry:

Thank you for the opportunity to review the draft EIS/CCP. The Wisconsin Department of Natural Resources would like to provide the following comments.

The Department strongly supports the purpose and goal of the Driftless Area National Wildlife Refuge. The proposed expansion and increased management has the potential to enhance and maintain this globally imperiled natural community as well as contribute to regional biodiversity and protection.

Goals for the Refuge are to conserve populations of the federally endangered Iowa Pleistocene snail and the federally threatened Northern monkshood. Additionally, the plan includes vaguely characterized goals for "habitat" and "species management" including conserving species of concern, inventory of plants and animals associated with algific talus slopes, and determining buffer areas needed to adequately protect algific slopes (p. 1 and 3).

Primary threats to the Northern monkshood and the Iowa Pleistocene snail are said to be "grazing, logging, sinkhole filling, erosion, pesticides, invasive species, and development" (p. i). The objectives sections on pp. 94-97 state that the majority of Refuge habitat has been impacted by past agriculture or logging uses, and that "changes to forests immediately adjacent to algific talus slopes may affect microclimate variables and increase encroachment of invasive species." In addition, it also describes strategies to "prevent impacts from grazing, logging, invasive species, erosion, and sinkhole filling."

Upon reviewing the Compatibility Determination (deemed compatible) to allow firewood and commercial tree cutting for habitat management purposes, it appeared that the Determination did not refer back to the aforementioned goals, issues, threats, and impacts. This section should discuss the specific compatibility of tree harvest with regard to protection of buffer areas around algific talus slopes, shading and microclimate, sedimentation to sinkholes, erosion, and spread of invasive plants such as garlic mustard. If tree harvest is to take place, it should pose no adverse effects on the federally listed species for which the Refuge is established. The statement, "constraints regarding location and timing of logging will reduce adverse impacts on affected species and habitat," leads the reader to conclude that some adverse impacts are likely to occur, possibly to the federally listed species. This would be incompatible with the purpose of the Refuge.

1
2

dnr.wi.gov
wisconsin.gov

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Through Excellent Customer Service



If there is a goal of restoring oak-hickory forests on the Refuge, as stated on p. 95, and there is a high deer population as stated elsewhere in the document, it is unlikely that natural regeneration of oak will be achieved. Oak forests are declining throughout their range in the Midwest, and it is a laudable goal to attempt to restore young oak forests. However, older oak forests are also scarce and becoming scarcer, and these are the areas that provide habitat for uncommon species like the Cerulean Warbler, Kentucky Warbler, and Acadian Flycatcher. These species are identified within the plan as occurring or likely to occur within the Refuge. These species are Partners in Flight priority species (p. 67) and are also listed as state-threatened by the State of Wisconsin.

3

Within the context of oak-hickory forest restoration, it may be appropriate to remove and sell trees of species such as maples, basswood, ironwood, ash, and elm. Such removals may or may not be commercially viable, particularly on such small sites. Nevertheless, the Compatibility Determination must place limits on such removals, ensuring that they do not exacerbate the threats to the federally listed species for which the Refuge is established. It is difficult to see how Refuge goals, issues, threats, and impacts can be adequately addressed in a narrowly constituted "Forest Management Plan." The Department would prefer the development of an integrated habitat management plan, including plans for oak-hickory forest restoration, within the context of the primary goal of conserving populations of federally listed species.

4

5

In summary, the Plan could be strengthened by providing clarification on what types of wildlife, in addition to the federally listed species, are to be encouraged through habitat management. The Compatibility Determination should be modified to clearly state that removal of trees through commercial or non-commercial harvests is only allowable if it does not, by direct or indirect means, constitute any threat to the federally listed species. Given that off-site threats are mentioned throughout the document, the Compatibility Determination as currently written does not lead the reader to this conclusion. The Determination is flawed in that it does not provide sufficient analysis and rationale for concluding that timber harvest is compatible with the purpose of the Refuge. In addition, the type of wildlife habitat to be featured at each Refuge location should be determined through an integrated planning process within the overriding goals of the Refuge, and forest harvesting should be a byproduct of habitat restoration and management programs.

Thank you for the opportunity to comment on the draft EIS/CCP for the Driftless Area National Wildlife Refuge.

Sincerely,



Scott Hassett
Secretary

CC: Scott Humrickhouse - WCR
Jay Hochmuth - SCR
Paul DeLong - AD/5
Laurie Osterndorf - AD/5
Signe Holtz - ER/4

Response to comment number 1: Wisconsin Department of Natural Resources

1. Thank you for your comments and support of the Refuge. Firewood and commercial tree harvest for habitat management purposes are intended only as possible management tools on small areas for specific management purposes as stated under the first paragraph of the description of the use in the accompanying Compatibility Determination (CD). Based on your comments, we added language to the CD to clarify the purpose of tree harvest as a management tool and how harvest can be completed while protecting or benefiting algal talus slope habitat.
2. For example, one purpose, which was explained under the habitat goal in the EIS, but not in the CD was the potential to improve the light regime for Northern monkshood by removing trees that are shading the algal slopes. This removal would usually be adjacent to, and not on, the slope. This would only be done after studies are completed on this issue. We added language that distance setbacks from endangered species habitat will be used when tree harvest is for other habitat management. This will prevent erosion or other impacts to endangered species habitat. We also amended the justification section to read 'prevent adverse impacts'.
3. We realize high deer populations are problematic for natural oak regeneration or for planted trees. We also have goals in the plan to manage deer and are hopeful that state efforts to reduce the herds will be successful in the next few years. We also will use tree protection when planting trees. We will maintain mature forests when they are present. However, most forests on the Refuge have been selectively logged during the last fifty years and few old forests are present.

Where removal of some tree species is not commercially viable, then other means may be used. Firewood permits may be useful in these situations. Some tree removal may be completed by Refuge staff.
4. Habitat and forest management plans will place limits on where and how many trees will be removed. Habitat management plans for each Refuge unit will be completed as stated on page 51 of the EIS under the habitat goal, objective 3. We changed the language in the CD to reflect this. These plans will include management actions to benefit endangered species, migratory birds, and resident wildlife in that order of priority. These plans will specify if forest management is needed and the specific goals, constraints, and uses of tree harvest within that.
5. The EIS specifies (page 50, objective 3) that Service Region 3 migratory birds of management concern are priority species for habitat restoration project planning. Different Refuge units may be managed for different specific bird species that will be outlined in Habitat Management Plans. The habitat goal in the EIS says 'conserve endangered species habitat and contribute migratory bird and other wildlife habitats within a larger landscape'. This is meant to recognize that other wildlife will benefit through habitat management and that we will coordinate with others, particularly for bird management. We added coordination with states and partners to develop habitat management plans under objective 3 of the habitat goal.

We intend to specify how habitat will be managed at each Refuge unit as stated on page 51. We intend tree harvesting as a method to accomplish habitat restoration and management programs where appropriate. It is meant to be one of many tools available for management.

Comment number 2



THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

Received	8/30/05
✓ Jeff	
_____ Clyde	
_____ Dale	
✓ Cathy	CJP
_____ Tim	
_____ Neil	
_____ Jim	
_____ Bob	
_____ Peter	
_____ Nick	
_____ Eric	

STATE OF IOWA

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

Cathy Henry
Refuge Operations Specialist
Driftless Area National Wildlife Refuge
PO Box 460
McGregor, IA 52157

Ms. Henry,

Iowa Department of Natural Resources field biologists have read the *Draft Environmental Impact Statement and Draft Comprehensive Conservation Plan for the Driftless Area National Wildlife Refuge* and have the following comments:

We agree that Alternative C: Habitat Protection, Increased Management and Integrated Wildlife-Dependent Recreation is the preferred alternative. We agree with the goals and objectives as presented under this alternative.

With respect to keeping the areas of the Refuge closed to white-tailed deer hunting, we realize that protection of these vital habitats is paramount to the Refuge's purpose. However, we also realize that non-hunted white-tailed deer populations have a detrimental effect on their habitats. Additionally, we are aware that Chronic Wasting Disease is present in the white-tailed deer herd in nearby Wisconsin. Therefore, we feel that closing areas to white-tailed deer hunting is not the best management tool to preserve these habitats and populations. Instead, we suggest closing only the algalic slopes to white-tailed deer hunting, and believe the remainder of the areas should be open to this type of hunting.

1

The Driftless Area National Wildlife Refuge is very important to the state of Iowa and the nation. Iowa is proud to have many of the areas in the Refuge in our state. This document is well written and visionary. We commend the Service and endorse all aspects of the plan. When the Plan is accepted and implemented it will provide the ability for endangered species to be protected and recover.

Sincerely:


Mike Griffin
IA DNR
Mississippi River Wildlife Biologist
206 Rose St.
Bellevue, IA 52031

Comment number 3



THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

STATE OF IOWA

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

July 18, 2005

Driftless Area NWR
CCP Comment
401 Business Highway 18N
P.O. Box 460
McGregor, IA 52157

Received	7/18/05
Vilsack	
Clyde	
Dude	
Cathy	CP
Jim	
Nell	
Jim	
Dean	
Peter	
Les	
Ph	

Thank you for the opportunity to review the Draft Comprehensive Conservation Plan and EIS for the Driftless Area National Wildlife Refuge.

I concur that Alternative C will provide the greatest benefits to listed and rare species. The increased monitoring and management to control invasive species are very important components in protection and management efforts for the Iowa Pleistocene snail and northern monkshood. This alternative also provides the best opportunity to delist the snail and move closer to delisting for northern monkshood.

Sincerely,

Daryl Howell
Daryl Howell
Zoologist

WALLACE STATE OFFICE BUILDING / 502 EAST 9th STREET / DES MOINES, IOWA 50319
515-281-5918 TDD 515-242-5957 FAX 515-281-6794 www.iowadnr.com

Response to comment number 2 and 3: Iowa Department of Natural Resources

1. Thank you for your comments and your support of the preferred alternative. We agree that high white-tailed deer populations have the potential to damage endangered species habitat as well as other wildlife habitat on the Refuge. We also agree that hunting can be an effective means of maintaining appropriate deer populations. Three of the units that are currently closed to public use consist primarily of algific slope habitat and are less than 25 acres. We do not believe hunting on these units would appreciably change the local deer population. Hunter activity on these small units would have potential to impact algific slopes. However, we will consider limited permit hunts on these units if we observe habitat damage by deer. We do plan to open the 140-acre Pine Creek unit in 2006 and will consider permit hunts on the 110 acre Cow Branch unit. Language to this effect was added to the CCP under species management goal, objective 4 and visitor services goal, objective 1.

The compatibility determination for hunting of resident game states that we will open newly acquired lands to hunting when there is sufficient public access and buffer acreage around endangered species habitat. It also states that units may be opened to special public hunts if habitat damage or disease conditions occur. We added language that the Pine Creek unit will be opened to hunting subject to appropriate special regulations, similar to other units. We also added the option to allow shotgun hunting for deer on Refuge units, which is not currently allowed.



Iowa Important Bird Areas (IBA) Program
P.O. Box 299
Lansing, Iowa 52151-0299

July 22, 2005

Cathy Henry, Manager
Driftless Area National Wildlife Refuge
401 Business Highway 18N
PO Box 460
McGregor, Iowa 52157

Dear Ms Henry:

The following are comments on the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Driftless Area National Wildlife Refuge, dated April 11, 2005.

Iowa Audubon, including 10 Audubon Chapters within Iowa with approximately 4,500 members, and the statewide Iowa Important Bird Areas (IBA) Program, supports improved land-use management, habitat restoration, environmental education, and carefully crafted public policy decisions that result in restoring the health of the entire Mississippi River Basin, including most especially, the beautiful Driftless Area. We recognize and greatly appreciate the fact that the entire Driftless Area is a national treasure worthy of federal and state support, and that these agency efforts should be augmented by as much assistance as possible from local, non-profit and private landowner protection and restoration efforts.

Accordingly, the position of all Audubon members and entities within Iowa is that we support Alternative C: Habitat Protection, Increased Management, and Integrated Wildlife-Dependent Recreation as described in your draft document.

We believe that the current Refuge (781 acres of land on nine scattered tracts) should continue to be managed for the benefit of the threatened Northern monkshood and the endangered Iowa Pleistocene snail, with the intent of helping each species reach endangered species recovery goals leading to delisting. However, the values of the estimated 6,000 acres of habitat that supports these species goes far beyond the habitat needs of these two very important threatened and endangered species. The algific talus slopes that support these species, are important to other species of birds and wildlife and are sites of scientific, cultural, educational and scenic value, as you have documented well in your draft plan and EIS.

1

We are especially concerned that *all conservation plans and all land management actions* taken on the Driftless Area NWR fully take into account the ecological needs of each of the migratory non-game birds of management concern identified in section 3.2.3 of the Draft EIS and CCP that may occur on the Refuge and several Region 3 resource conservation priority bird species.

2

We fully support *all proposed land acquisitions* mentioned in the CCP, and submit that any new property added to the Refuge should also give full consideration to the species of birds mentioned in section 3.2.3 and all other forms of biodiversity present on these properties.

The Iowa Audubon Important Bird Areas (IBA) Program is in the process of implementing a nomination and identification process for habitats that support 37 key species of birds that have been identified by the Iowa IBA Technical Committee as species of high conservation priority. Eleven of the bird species listed in section 3.2.3 of the Draft EIS and CCP are also species of high priority conservation concern within Iowa. It is very likely that there may be sites within the current Refuge, or sites under consideration for addition to the Refuge that are or will be Audubon Important Bird Areas or could be immediately adjacent to officially recognized IBA sites. *We most especially are advocates for long-term monitoring projects; and long-term protection, restoration, enhancement and management of each of these habitats.*

Iowa Audubon and the Iowa IBA Program will collaborate as much as possible with the U.S. Fish and Wildlife Service on the development and implementation of both monitoring and conservation plans for certain sites, including the development of "site support groups."

We suggest that, in the final document, you include two changes: One, Expand the dotted line boundaries of the "Driftless Area" on your maps to be consistent with the considerably larger geographic area described by the new Driftless Area Initiative – a collaborative effort of Resource Conservation and Development (RC&D Programs), non profit organizations and state and federal agencies currently working on management of this region. Two, Acknowledge that future planning should include collaboration by the Service and Iowa Audubon to develop and implement both monitoring programs and conservation plans for properties that are currently part of the Refuge or are evaluated and/or actually added to the Refuge, where such sites are also real or potential Important Bird Areas (IBAs).

3

4

We would be happy to continue to work with you as you complete the Comprehensive Conservation Plan process and implement its provisions, particularly as the Important Bird Area program continues to develop across Iowa.

Please contact me if you have questions about our comments on the Draft EIS and CCP

Sincerely,

Signed....

Ric Zarwell, Coordinator
Important Bird Areas (IBA) Program
Iowa Audubon



Comment number 5

10/2/05

Reviewed	_____
✓ Draft	_____
✓ Copy	_____
✓ Call	_____
✓ Tel	_____
✓ Mail	_____
✓ Jm	_____
✓ Coll	_____
✓ Peter	_____
✓ Mike	_____
File	_____

Upper Mississippi River Campaign
 Main Office
 2157 Ventura Drive, Suite 106
 Woodbury, MN 55125
 Tel: 651-739-9333
 Fax: 651-731-1330
 www.audubon.org

Great River Birding Trail
 Coordinating Office
 1707 Main Street, Suite 105
 La Crosse, WI 54601
 Tel: 608-784-2992
 Fax: 608-784-4438

UMR Campaign Field Trip
 Coordinating Office
 P.O. Box 309
 McGregor, IA 52157
 Tel: 563-586-2621

July 19, 2005

Driftless Area NWR
 Attn: CCP Comment
 401 Business Highway 18N
 PO Box 460
 McGregor, Iowa 52157

Dear Recipients:

Thank you for providing a copy of the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Driftless Area National Wildlife Refuge, dated April 11, 2005.

The Audubon Upper Mississippi River Campaign, established in 1998, supports habitat restoration, environmental education, and public policy decisions that result in restoring the health of the Mississippi River in Minnesota, Wisconsin, Iowa, Illinois and Missouri.

We recognize that the Mississippi River floodplain and the Driftless Area in this region are national treasures worthy of federal and state support, augmented by local, non-profit and private protection and restoration efforts.

The current holding of the Refuge (781 acres of land on nine scattered tracts) should continue to be managed for the benefit of the threatened Northern monkshood and the endangered Iowa Pleistocene snail, with the intent of helping each species reach endangered species recovery goals leading to delisting.

However the values of the habitat that supports these species (estimated to include at least 6,000 acres in 22 counties in Illinois, Iowa, Minnesota and Wisconsin) goes well beyond habitat important for threatened and endangered species. The algalic talus slopes that support these species, are important to other species of birds and wildlife and are sites of scientific, cultural, educational and scenic value, as you have documented well in your draft plan and EIS.

As noted on page 67 of the draft report, several migratory non-game birds of management concern may occur on the Refuge and several Region 3 resource conservation priority bird species are present in the region and likely to occur on the Refuge, particularly if the proposed acquisitions are also considered.

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The Audubon Important Bird Area program, active in all of the states mentioned in the previous paragraph, is in the process of implementing a nomination and identification process for sites containing habitat that supports key species identified by Audubon for protection. Because this program is in different stages in each of the states affected, we are not able, at this time, to match our final Important Bird Area maps with your maps of existing or proposed new sites for the Refuge. However, it is very likely that there may be sites under consideration for addition to the refuge that also are or will be Audubon IBA sites or could be immediately adjacent to designated IBA sites.

It would be valuable for Audubon and the U.S. Fish and Wildlife Service to collaborate on the development of conservation plans for certain sites, including the development of "site support groups" and the development and implementation of monitoring programs at certain identified sites.

In consideration of the above comments, Audubon supports Alternative C: Habitat Protection, Increased Management, and Integrated Wildlife-Dependent Recreation as described in your draft document. We also suggest that, in the final document, you include two changes:

1. Adjust the dotted line boundaries of the "Driftless area" on your maps to be consistent with the slightly larger geographic area described by the Driftless Initiative – a collaborative effort of non profits and agency representatives currently working on management of this region.
2. Acknowledge that future planning should include collaboration by the Service and Audubon to seek to work together to develop and implement conservation plans for any sites that are evaluated and/or actually added to the refuge, where such sites are also being considered or identified as Audubon IBA sites.

We would be happy to engage in additional consultation with you as you continue to complete the Comprehensive Conservation Plan and implement its provisions, particularly as the Important Bird Area program continues to develop in this region. Please contact me if you have questions about our interests or our comments on this draft documents.

Sincerely,



Dan McGinnis

Director

Cc: Judy Pollock, Audubon, Illinois IBA Coordinator
Ric Zarwell, Iowa IBA program
Mark Martell, Audubon Minnesota
Yoyi Steele, Wisconsin DNR, IBA program
Jon Stravers, Audubon, Upper Mississippi River Program
Bonnie Koop, Audubon, Upper Mississippi River Program

Response to comment number 4 and 5: Iowa Audubon and Audubon, Upper Mississippi River Campaign

1. Thank you for your comments and support of the Refuge. We recognize the value of habitat on the Refuge for species other than the endangered species. We believe that our habitat goals and associated strategies to conserve endangered species habitat and contribute to migratory bird and other wildlife habitats within a larger landscape captures this outcome. Objective 3 under the Habitat Goal says that we will write Habitat Management Plans for each Refuge unit.
2. We will consider the migratory birds identified on page 67 when preparing these plans. We would appreciate Audubon's assistance in identifying specific species to target for management at that time. However, we need to complete bird inventories as identified in the species management goal, objective 3 before we can write Habitat Management Plans. Audubon may also be of assistance with these inventories.
3. We amended the general driftless area boundary to be consistent with that used by the Driftless Area Initiative.
4. We added language to strategy 4, objective 3, Habitat Goal to address coordination with partners on Habitat Management Plans. We included language in objective 4 in the habitat goal about coordinating with partners in site protection.

Comment number 6



The Nature Conservancy in Iowa
303 Locust Street, Suite 402
Des Moines, IA 50309

tel (515) 244.5044
fax (515) 244.8890
nature.org/iowa

July 19, 2005

Driftless Area NWR
CCP Comment
c/o Mr. John Lindell
401 Business Highway 18N
P.O. Box 460
McGregor, IA 52157

Dear Mr. Lindell:

For the past 15 years The Nature Conservancy has been a strong supporter and partner of the Driftless National Wildlife Refuge. We applaud the Service's continued efforts to protect and conserve the Algific Talus Slopes of the Driftless Region in Iowa, Illinois, Minnesota and Wisconsin. We also appreciate the opportunity to comment on The Driftless Area National Wildlife Refuge's Draft Comprehensive Conservation Plan (CCP) and look forward to assisting the Service with the implementation of this plan.

After reading and reviewing the Draft CCP for the Driftless National Wildlife Refuge The Nature Conservancy chapters in Iowa, Illinois, Minnesota and Wisconsin have decided to strongly support the Preferred Alternative - Alternative C - Habitat Protection, Increased Management and Integrated Wildlife-dependent Recreation Alternative.

The Algific Talus Slopes of the Driftless Region are a truly unique and priceless natural resource. These relicts of the last ice age give us a glimpse into our glacial past, provide valuable scientific information and are endlessly fascinating to anyone who has had the pleasure of visiting them. If Alternative C is approved and successfully implemented we feel that one outcome will be the delisting of the Iowa Pleistocene Snail – a feat which the Service and American people would obviously celebrate.

The Nature Conservancy is actively engaged in the conservation and restoration of freshwater ecosystems of the UMR basin for the benefit of all residents. Our Upper Mississippi River Program objectives include protecting and restoring the functions of the basin's natural bluff to floodplain landscapes. The DANWR Comprehensive Conservation Plan and the preferred Alternative C help achieve that objective.

Sincerely,

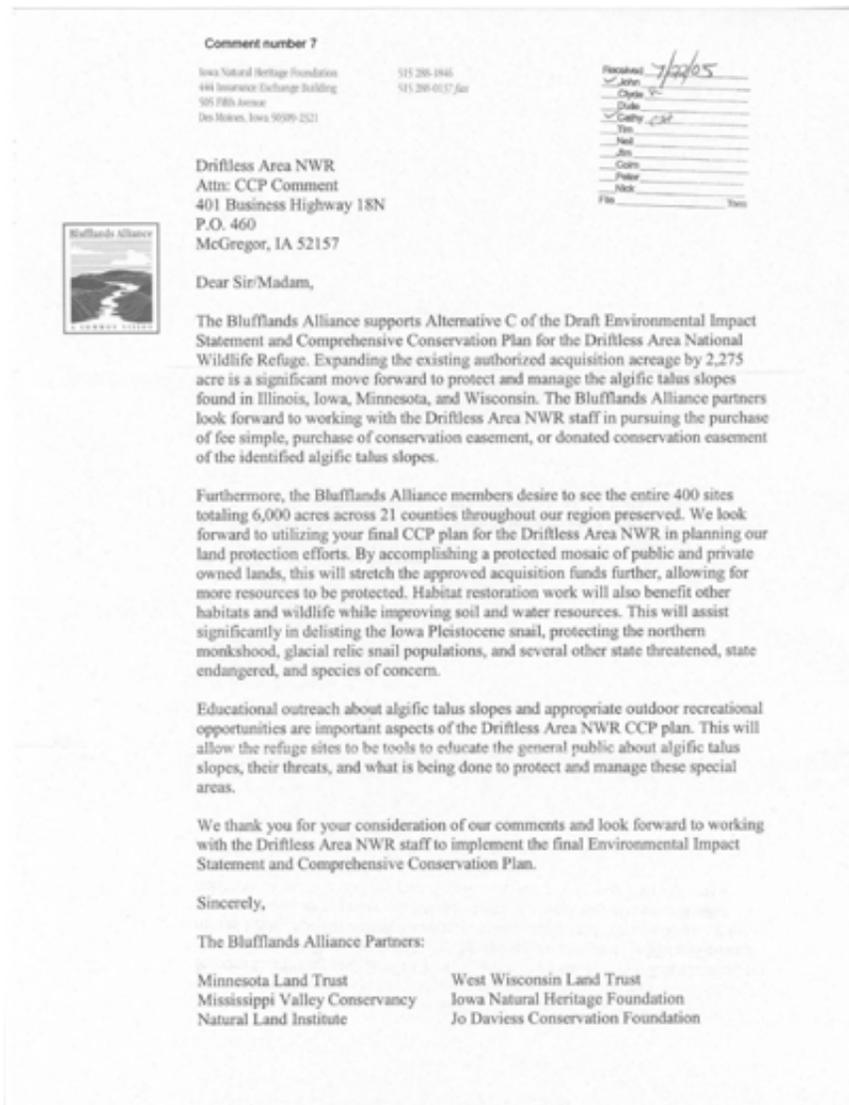
Leslee Spraggins
Iowa State Director

Mary Jean Huston
Wisconsin State Director

Ron Nargang
Minnesota State Director

Michael Reuter
Acting Illinois State Director

Response to Comment number 6: The Nature Conservancy – Illinois, Iowa, Minnesota, Wisconsin
Thank you for your comments and support of the preferred alternative.



Response to comment number 7: Iowa Natural Heritage Foundation and Blufflands Alliance
 Thank you for your comment and support of the preferred alternative.



Comment number 8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 6TH STREET
KANSAS CITY, KANSAS 66101

JUL 19 2005

Received	2/24/05
John	
Chap	
City	
CR	
Mail	
Jim	
Call	
Pat	
Nick	
File	

Driftless Area NWR
CCP Comment
401 Business Highway 18N
P.O. Box 460
McGregor, Iowa 52157

Dear Planning Team:

RE: Driftless Area National Wildlife Refuge Draft Environmental Impact Statement (DEIS) and Draft Comprehensive Conservation Plan (Plan)

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, U.S. Environmental Protection Agency (EPA) Regions 5 (Chicago) and 7 (Kansas City) has reviewed the referenced DEIS and Draft CCP. The DEIS and Draft CCP outlines management goals, and management actions to achieve restoration and conservation goals for the next 15 years. To address stated recovery and conservation needs, three alternatives were retained for detailed analysis. Alternative A, the no action alternative, includes no land acquisition but current habitat management would continue. Delisting would not occur for listed species. Alternative B would expand the refuge by 3400 acres and would provide minimal habitat management. Recovery for listed species would likely not occur under Alternative B. Alternative C would expand the refuge by 2275 acres and provides more active management of refuge lands and endangered species habitat. Delisting is likely to occur. Based on the information provided in this document, our Agency's review has resulted in a rating of "LO" (Lack of Objections). This "LO" rating indicates that we believe that implementation of the preferred alternative would result in minimum adverse impacts to the environment.

EPA appreciates the opportunity to review the DEIS. We request that you send our offices (Chicago and Kansas City) two (2) copies of the Final EIS at the same time that it is sent to the Office of Federal Activities (2251A), EPA, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20044.

Please contact me at, (913) 551-7148 if EPA assistance is needed, particularly with air quality aspects of prescribed burning.

Sincerely,

Joseph E. Cothem
NEPA Team Leader
Environmental Services Division



Response to comment number 8: U.S. Environmental Protection Agency
Thank you for your comments.

Comment number 9



jean public
<jeanpublic@yahoo.com>
m>

To: driftless@fws.gov
cc: rodney.frelinghuysen@mail.house.gov
Subject: public comment on federal register of 6/3/05 vol 70 no 106 pg 32610

05/08/2005 04:33 PM

us epa er frl 6663-9 eis 2005 0211 ccp snail - i think
all steps should be taken to restrict development to
encourage the life of the northern monkshod and iowa
pleistocene snail. all steps.

1

it is important to preserve these areas for the
american taxpayers who have been paying taxes since
1900 to preserve them as open space. don't monkey with
the area.

b. sachau
15 elm st
florham park nj 07932

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<http://discover.yahoo.com/online.html>

This comment came through our Planning mailbox...

— Forwarded by JaneLandyNelson/R3/FWS/DOI on 05/31/2005 08:46 AM —

Comment number 10



Bk1452@aol.com
05/29/2005 05:30 PM

To: r3planning@fws.gov, rodney.frelinghuysen@mail.house.gov
cc: info@sharkonline.org, info@ddal.org, info@peta.org
Subject: public comment on federal register of 5/19/05 vol 70 no 96 pg 28952

usdoi usfws draft ccp eis for driftless national wildlife refuge, iowa, wisconsin and il

i think the following should be banned in this NATIONAL AREA!!!!!!!!!!!!

2

1. hunting
2. trapping
3. all new roads
4. grazing
5. mining
6. logging
7. all two stroke vehicles
8. prescribed burning which pollutes the air and travels thousands of miles to the east carrying fine particulate matter which causes lung cancer, heart attacks, strokes and asthma.

3

b. sachau
15 elm st
florham park nj 07932

Comment number 11

— Forwarded by Vicky Drieslein/R3/FWS/DOI on 08/01/2005 03:25 PM —



bk1492@aol.com
07/30/2005 01:11 PM

To: uppermississippi@fws.gov
cc: rodney.frelinghuysen@mail.house.gov
Subject: public comment on federal register of 7/29/05 vol 70 no 145 -page 43886

d sfw h65024-ta driftless area NATIONAL wildlife refuge -notice that this is a nationally supported by taxpayers area - it is not a place supported only by local profiteers.

the national taxpayers pay for land so that it remains open space and they are not just HOLDING it until some local profiteer comes along (including employees who sometimes forget they don't own the place).

i think the following should be totally banned in this area:

1. hunting
2. trapping
3. new roads
4. all two stroke vehicles
5. mining, drilling, grazing and logging
6. prescribed burning which releases fine particulates which then travel thousands of miles ultimately lodging in human bodies causing lung cancer, heart attacks, strokes, pneumonia and asthma.

i support protecting (not conserving since this is a code word used to hide hunting/and killing and is used in that way ALL the time). the monkshood and pleistocene snail.

b. sachau
15 elm st
florham park nj 07932

Response to comment numbers 9, 10, 11: Citizen comments

1. Thank you for your comments. The purpose of the Refuge is to conserve the threatened Northern monkshood and endangered Iowa Pleistocene snail and that is what the plan is intended to do. The intent of Refuge land acquisition is to permanently protect these species as identified in their endangered species recovery plans. The only activities listed in comments 10 and 11 that are, or will be allowed on the Refuge are hunting and prescribed burning.
2. Hunting not only provides recreation, but is a means of managing wildlife. There are particularly high deer populations in the area currently. Hunting will help prevent adverse impacts to endangered species and other wildlife habitat by deer. All endangered species habitat is closed to all public entry.
3. Prescribed burning creates short term air pollution and long term habitat benefits. The prescribed burns conducted on the Driftless Area Refuge and small, infrequent, and of short duration.

Comment number 12

— Forwarded by Jane LardyNelson/R3/FWS/DOI on 07/28/2005 02:15 PM —



"Eric Nordschow"
<enord1@mabelltel.coo
p>
07/23/2005 05:01 PM

To: <r3planning@fws.gov>
cc:
Subject: Driftless Area NWR CCP

Comment of Driftless conservation area plan 2005

Additional acquisitions of lands to the state, national governments for these purposes needs to be dropped. The 1973 species protection act allowed these species to be considered even though undercounts of the species at the listing time were not evaluated. Delisting a species because of now better counts is great with the perspective it should probably not have been listed at all. Though these are fragile environmental areas the qualified staffs need to be expanded to work with private owners and programs with emphasis that does not utilize land purchases by the governments. There are becoming numerous examples of species being delisted because of inaccurate original population counts. It is not what the laws were designed for and why they need to be updated. We can not buy it away from ourselves. We need to learn to own and care for the land with stewardship ethics. The governments and staffs need to work towards these goals.

Eric Nordschow
Decorah, Iowa

1
2
3

Response to comment number 12: Citizen comment

1. We agree population estimates are difficult for the Iowa Pleistocene snail because of its small size and where it lives. We have been conducting more detailed monitoring during the last five years to obtain better population estimates and trends for this species. Population estimates for the northern monkshood are somewhat easier to obtain and likely would not change greatly based on different personnel or methods.
2. Regardless of population counts, the reason for these species being listed as endangered and threatened is because of the threats to their populations. They both exist in a very discrete and fragile environment that cannot be restored once lost and they are both difficult species to reintroduce to appropriate habitat. The Iowa Pleistocene snail occurs nowhere else in the world. Therefore, when making a decision to list, whether threatened or endangered, the numbers are not as important as the threats to their habitat. Although it is often the case that the operative threats have significantly reduced the species affected. For these particular species, long term protection is the primary means of ensuring they survive for many years to come. We anticipate they will be delisted when enough sites are secure from the threats that may destroy the habitat and when populations are considered stable.
3. We agree that land stewardship by any owner is the best way to protect these sites, as well as other natural resources. We will promote land stewardship whenever possible. We have worked with private owners in the past and will continue to do so. Land acquisition by the Refuge is not the only means of protection outlined in the EIS. We do have strategies in objective 4 under the habitat goal of maintaining contact with landowners and working with partners to protect sites through a variety of means. This protection could be through USDA programs, conservation easements, or simply assisting with fencing and other direct habitat protection measures. Fee title acquisition is often the best long term protection option because landowners and shorter term government programs can change. However, we believe it will take a combination of these methods to reach delisting goals.