

Appendix I



Refuge kiosk
USFWS photo

Summary and Response to Public Comments

Introduction

We received 590 responses on our draft CCP/EA in oral comments at our public meeting, in phone calls, written correspondence, or electronic documents. The comment period extended 57 days, from December 5, 2005, to January 31, 2006.

We received two letters from state agencies:

- New York State Department of Environmental Conservation, Division of Fish, Wildlife and Marine Resources (NYSDEC)
- New York State Office of Parks, Recreation, and Historic Preservation, Historic Preservation Field Services Bureau (SHPO)

We received three letters from town and county government officials:

- Ulster County Legislature Environmental Committee
- Town of Shawangunk Supervisor
- Town of Gardiner Environmental Conservation Commission

We received seven letters from local and national conservation organizations, associations, groups, or clubs:

- Mohonk Preserve
- Orange County Audubon Society, Inc.
- Audubon New York
- The Nature Conservancy Eastern New York Chapter
- Wildlife Watch, Inc.
- New York State Ornithological Association, Inc.
- Edgar A. Mearns Bird Club

We received 579 responses from individuals:

- 541 electronic mailings
- 25 letters
- 1 phone call
- 11 facsimiles

Thirty-eight people attended our public meeting on January 17, 2006, from 7:00 p.m. to 9:00 p.m., at the Wallkill Hook, Ladder & Hose in Wallkill, New York. Some submitted written instead of oral comments, while others submitted both. More comments arrived later by post or electronic mail.

The following discussion summarizes the substantive issues they raised and our responses to them. Many of our responses refer to the full text copy of our draft CCP/EA, and indicate how the final CCP reflects our proposed changes. If you would like to view or download copies of the draft CCP/EA or final CCP, they are available online at <http://library.fws.gov/ccps.htm>. You may also request them on CD-ROM or in print by contacting the refuge headquarters. Phone: (973) 702-7266. Email: WallkillRiver@fws.gov

Wallkill River National Wildlife Refuge
1547 Route 565
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I. Priority Public Uses

a. Hunting

Comment. The majority of the comments we received came from people who oppose any form of hunting on national wildlife refuges. They expressed their concern that hunting is inconsistent with the very definition of the word “refuge,” violates federal policy, and contradicts the mission of the National Wildlife Refuge System.

Response. The National Wildlife Refuge System Improvement Act of 1997 (Improvement Act) identifies hunting as one of six priority, wildlife-dependent recreational uses that are to receive enhanced consideration in refuge planning. The others are fishing, wildlife observation and photography, and environmental education and interpretation. The Improvement Act directs us to provide high-quality opportunities for those priority uses when they are compatible with refuge purposes, goals, and other management priorities. The act did not establish a hierarchy among the six uses, but enables refuge managers to facilitate them when they are compatible and appropriate. Appendix B includes our compatibility determination on the archery deer hunt.

Comment. Some expressed their opposition to archery hunting, in particular. They believe it is the most inhumane, cruel form of deer hunting, resulting in high rates of wounding and extended suffering for deer that are hit, but are not killed.

Response. We respectfully disagree that a well-managed archery hunt program would be an inhumane, cruel form of hunting. No published statistics from peer-reviewed, professional publications support that concern. In addition, we have not witnessed a significant concern on refuges throughout the Northeast region that have offered an archery deer hunt program for years.

Comment. We heard from several reviewers, including the NYSDEC, who support hunting as a way to control deer populations and provide a recreational activity. A few other reviewers suggested there is no biological need to control deer on the refuge that warrants opening it for archery hunting.

Response. Hunting is one method for managing deer populations, a legitimate, generally accepted recreational activity, and one of the six priority public uses of the Refuge System. Whether deer have overpopulated an area or have damaged resources is not the sole justification for a deer hunt on a national wildlife refuge.

For example, the NYSDEC has determined there is a harvestable deer population in its wildlife management unit 3J, which includes the refuge. That agency is a strong advocate for this hunting opportunity, because areas open to public hunting continue to decline in the area. Our strong partnership with that agency and its encouragement provide a strong incentive. The refuge manager has the authority to implement a deer-hunting program upon the approval of this CCP, after developing a hunt plan and publishing a notice in the Federal Register.

Although we have not conducted a formal census, we believe the number of deer that use the refuge is increasing. We also believe that increase primarily results from the increase in residential development in the area. Several refuge neighbors who attended the public meeting said that they have also observed increasing numbers of deer in recent years.

The draft CCP/EA (page 4-19) mentions that an overpopulation of deer would degrade habitat by overbrowsing, would increase the number of deer-automobile collisions, and would cause the depredation of crops or landscaping on adjacent properties. Ted Kerpez, Regional Wildlife Manager of NYSDEC, told us “deer overabundance is one of the top threats to biodiversity in the Shawangunk Ridge Area” (Kerpez, pers. comm. 2006). We would like to add that an overabundant deer population might also increase the potential for chronic wasting disease, an increasing concern since its recent discovery in upstate New York. A hunt program operated under state regulations on the refuge would help maintain its deer population within the carrying capacity of its habitat. We would work with NYSDEC and their goals for wildlife management unit 3J in managing refuge deer populations at the level necessary to maintain quality habitat for diverse wildlife and minimize threats to agriculture and public health.

Two people questioned our statement in the draft CCP/EA (page 4-19) that an overabundant deer population could contribute to increased local incidences of Lyme disease in the human population. We checked the Center for Disease Control (CDC) website at http://www.cdc.gov/ncidod/dvbid/lyme/ld_transmission.htm for clarification. We apologize for any misstatement. The CDC site states

“The Lyme disease bacterium (*Borrelia burgdorferi*) normally lives in mice, squirrels, and other small animals. It is transmitted among these animals – and to humans – through the bites of certain species of ticks. . . . Although adult ticks often feed on deer, these animals do not become infected. Deer are nevertheless important in transporting ticks and maintaining tick populations.”

In our draft CCP/EA (page 4-20), we predict that the present deer population on the refuge would lessen over the long term, but would remain relatively stable within the carrying capacity of the habitat. A predicted maximum of 50 hunters with a success rate of 15 percent could take eight deer each year.

Comment. Several reviewers were concerned that opening the refuge to hunting will affect other priority public uses, such as wildlife observation.

Response. We recognize that hunting may affect other priority public uses on the refuge during the hunting season. However, we will attempt to minimize conflicts among users through outreach and communications. We will post a warning at the refuge entrance during the hunt season, but otherwise do not plan to close the refuge to other uses. In 2005 and 2006, the early archery deer season is relatively short: it lasts from October 15 to November 16.

Comment. Adjacent landowners have expressed concern about allowing archery hunting near their homes. They are worried about the safety of children, domestic animals, etc.

Response. Safety is our paramount consideration in developing this hunting program. It will comply with all state and federal safety regulations on discharging bows. New York State hunting regulations make it illegal to discharge a bow so that its load, or arrow, passes over any part of a public highway (any road maintained by state, county, or town) or within 500 feet of any dwelling, farm building, or structure in occupation or use.

Comment. One reviewer was unsure whether the proposed hunting site was adequate, that the woods along Hoagerburg Road were too thick to hunt.

Response. Deer hunters will operate from temporary tree stands, where they will be able to view deer below. Except when they access their tree stands or retrieve game, we do not expect them to be walking on the ground.

Comment. Some reviewers expressed a desire for the refuge to offer additional opportunities for hunting. They suggested that the refuge provide opportunities for shotgun and muzzleloader hunting as well as turkey hunting on the refuge.

Response. The draft CCP/EA (pages 3-8 and 3-9) describes our rationale for not including more hunting seasons. We are concerned about the disturbance of federal trust resources at sensitive times of the year, or that the hunts would require a lot of hunter access across country in areas that pose a safety hazard (e.g., exposed, broken culverts, or the excavated foundations of former buildings). We determined that the white-tailed deer archery season, when hunters will hunt primarily from tree stands, is the only hunting season that would produce a safe, high-quality hunting experience with either minimal or no disturbance of grassland-dependent birds and their habitats. We define a “high-quality” hunt program in the draft CCP/EA (page 3-33).

b. Fishing

Comment. Several reviewers supported our plan to open the pond for fishing. A few others opposed it, expressing concern over the possibility that anglers will leave garbage, including monofilament line, which would degrade the site or create a threat to birds.

Response. Federal regulations require all refuge visitors to remove their trash before leaving the refuge. Through outreach and education, we will alert visitors to that responsibility. In addition, our staff and law enforcement personnel will check periodically to ensure that visitors, including anglers, are complying with refuge regulations. If trash becomes a persistent problem at the pond, or the site becomes degraded, or wildlife is threatened, the refuge manager has the authority to close the refuge to fishing.

Comment. One reviewer was concerned that restocking the pond would be necessary to provide continued satisfaction for anglers: that restocking will not only reduce the biodiversity of fish, but also, the increased number of anglers would disturb wildlife.

Response. Although we are opening the pond to fishing, we do not propose to stock it at this time. We describe in the draft CCP/EA (pages 3-9 and 3-10) why we would not allow the stocking of non-native fish. Although stocking with native fish is a low priority now, we may consider it in the future, but only in cooperation with NYSDEC. As a result, we expect fishing pressure to be very low at the pond, because it does not provide a high-quality fishing experience, and the nearby Wallkill River and tributaries offer better fishing. We predict the composition of fish species in the pond would not change over the short term, but their populations would diminish over time.

II. Non-priority Public Uses

a. Bicycling, Jogging, and Horseback Riding

Comment. A few reviewers expressed their desire to see the refuge open for bicycling, jogging, or horseback riding. Those interested specifically in biking or jogging suggested that, if they remain on the runways, their impact on wildlife would be minimal. The reviewer interested in horseback riding cited the limited areas available for that activity in the surrounding area, and suggested that if they ride on the edge of the woodlands and grasslands, their impact on wildlife would be minimal.

Response. The refuge manager frequently receives requests for new activities on the refuge. However, as we describe in the draft CCP/EA (page 1-8), before any new activity is initiated or permitted, the refuge manager must determine that it is a compatible use and consistent with laws, regulations, Service policy and public safety (603 FWS 2). In the draft CCP/EA (page 3-9), we identify several reasons why we have not allowed those activities on this refuge. In addition, the refuge manager has the discretion to allow or deny any use based on the resources available to administer it, such as funding or personnel. Although those activities would not require new infrastructure, they would require regular monitoring to ensure they do not affect refuge resources. The refuge manager has determined that the best way to spend limited refuge resources is in sustaining the refuge programs for priority, wildlife-dependent recreational use.

b. Furbearer Management

Comment. Several reviewers, including the NYSDEC, would like to see the refuge offer a general trapping program. They are concerned about the increasing populations of such species as fox, raccoon, and coyote, and they believe development and restrictions on public access increasingly limit opportunities for trapping.

Response. Furbearer management is not one of the six priority public uses. In addition, the refuge manager does not want to divert limited staffing and funding to administer this program, but plans to focus those resources on hunting, wildlife observation and photography, and interpretation. However, we do plan to use furbearer management as an administrative tool, when needed, to protect federal trust resources of conservation concern, such as nesting and wintering migratory birds. The refuge manager will determine when conditions on the refuge warrant administrative trapping.

c. Model Airplane Flying

Comments. Several reviewers opposed model airplane flying because of concerns about noise, the disturbance of wildlife and interference with “passive recreation.” Others, including several who attended the public meeting, expressed their desire to see the refuge allow model airplane flying, which the previous owner of this former Galeville Military Training Site allowed. They claim that it was very popular and regionally important for enthusiasts of model airplane flying, and that the conditions this site affords (e.g., the large, open, unobstructed air space outside major air traffic) are not available anywhere else in the region.

Response. We recognize the dedication of enthusiasts of model airplane flying, and acknowledge that the pursuit is popular among people of all ages. We also recognize that opportunities are limited on public lands in the region. However, after thorough analysis in a formal compatibility determination and a public review and

comment period, in 2002 the former refuge manager determined model airplane flying was not compatible. Our Director reviewed and upheld that formal determination. Members of the New York congressional delegation also reviewed it. The current refuge manager supports it, and the draft CCP/EA and this final CCP incorporate it. Please refer to appendix B for the compatibility determination on model airplane flying and model airplane aeronautical events.

III. Habitat Management

a. Prescribed Burning

Comment. Two reviewers expressed concern over the use of prescribed burning to manage grassland habitat on the refuge. They are concerned about the health of animals on the refuge as well as animals and people in the surrounding area.

Response. We described our potential use of this habitat management tool in the draft CCP/EA on pages 3-23 and 4-11. The latter states “the wet soils of the refuge inhibit our extensive use of fire, and the cool-season grasses that dominate refuge fields have only a short time period during which fire can be applied to invigorate growth....Most likely, we would burn on one or two days per year.”

We also describe on page 4-11 how we would comply with all applicable federal, state, and local requirements to control air pollution, manage smoke and avoid safety risks. Our prescribed fire plan (appendix F) addresses smoke emissions, plume direction, and identifying and protecting sensitive areas. We would pay close attention to wind conditions when burning near roads and highways to prevent driving hazards, and would not hesitate to postpone a burn in questionable wind conditions. This final CCP would allow the use of fire as a management tool under the conditions noted above.

b. Grazing

Comment. Several reviewers expressed concern about the use of grazing on the refuge.

Response. We described our potential use of this habitat management tool in the draft CCP/EA on pages 3-23, 4-14, and 4-15. We would use livestock grazing (cattle, horses, goats, and sheep) to control non-native species and reduce shrub and tree seedlings that encroach on the grasslands. We would issue special use permits to local farmers that include terms and conditions about the numbers, timing, and area allowed for grazing. We would monitor the program and, if its impacts become unacceptable, could terminate it at any time.

Cooperating with local farmers will not only achieve our habitat goals, but also help the local farming community sustain its agricultural business and way of life. It would also provide us an outreach opportunity to share grassland management techniques to benefit wildlife. This final CCP would allow the use of grazing as a management tool under the conditions noted above

c. Herbicide Use to Control Invasive Species

Comment. Several reviewers supported our use of herbicides as needed to control invasive species and preserve grasslands habitat. One suggested it should be used judiciously, if at all. Others expressed concern over any use of herbicides on the refuge. Some claimed the practice was not in keeping with the purpose of a wildlife refuge, that the “cure was worse than the disease.” Others worried that the herbicides are more malignant than the evidence shows, and questioned the source for our discussion of impacts. Local residents attending the public meeting are concerned that herbicides will end up in surrounding water systems, and expressed concern about the cumulative impact from the surrounding landowners. Several reviewers encouraged the refuge to use, and continue research on, primarily biological methods as the best way to control non-native species.

Response. Controlling purple loosestrife on this refuge is a huge concern. The draft CCP/EA (page 1-19) describes that issue in more detail. We identify herbicides as one of several tools we could use to control invasive plants and enhance our ability to maintain high-quality grassland habitats. We have not used herbicides on the refuge, and would use them only when mechanical and biological control treatments lose their effectiveness. We will continue to cooperate with Cornell University in monitoring the viability of biological control agents on purple loosestrife. If we could rely on the biological control agents as the sole treatment for reducing purple loosestrife, that would be ideal, but we have not substantiated yet their effectiveness over the long term.

We describe our maximum potential use of herbicides and their potential impacts in the draft CCP/EA on pages 4-12, 4-14, 4-15, and 4-16. We have used those herbicides successfully on many other refuges in the Northeast without deleterious effects. The Service requires the development of a detailed pesticide use proposal, which our regional contaminants coordinator must review and approve annually before any use. The use of pesticides on refuges is highly regulated; human health and safety are the paramount concerns.

We stand by our source for information on the predicted impacts of herbicide use at the levels proposed. According to our contaminants coordinator, this website includes research summaries by scientists published in objective, peer-reviewed publications. However, we would like to point out an error in the draft CCP/EA (pages 4-12 and 4-14) about the location of the website. The correct site for additional information on herbicides is <http://extoxnet.orst.edu/pips/ghindex.html>. If you would like specific information on glyphosate or 2, 4-D please visit: <http://extoxnet.orst.edu/pips/glyphosa.htm> or <http://extoxnet.orst.edu/pips/24-D.htm>.

d. Planting Food Plots

Comment. One reviewer suggested that the refuge establish food plots for turkeys and other hunted species.

Response. Our management priority is to provide high-quality habitat for grassland-nesting birds and wintering raptors. We will direct our available staffing and funding resources to support that priority. Although we acknowledge that turkeys are a native species, and hunting is a priority public use, we would not direct our limited resources away from activities that do not directly support refuge purposes or management goals.

e. Runway Removal and Restoration

Comment. Several reviewers supported the removal of the runways to create a more natural setting and provide additional, high-quality grasslands. Several others voiced their opposition to any restoration design that would result in the complete removal of the runways. Their reasons varied. Some expressed concern that the cost of the runway removal is too high. They suggested other alternatives such as removing, or breaking up, alternating sections of the runway, cutting a series of swaths through the runways to improve or increase surface water flow, or bringing in soil to cover them. Others expressed concern that hauling the thousands of tons of debris off-site would affect the road system in local communities and their safety in that congested truck traffic.

Two refuge neighbors worried that removing the runway would damage the drainage system and affect the hydrology of the area. One suggested that we plan nothing until we have conducted a Phase I Environmental Site Assessment. He was concerned that contamination under the runway could negate any plans. Another reviewer questioned whether completely removing the runways was even feasible, given information indicating their depth was several feet.

Several reviewers explained the benefits the runways provide to the refuge. They provide habitat for several nesting and foraging birds. Refuge visitors have sighted killdeer, horned larks, northern harriers, and short-eared owls that feed or nest near or on the runways. They also provide easier access for people with disabilities, as well as locations for birders to set up stationary scopes. Some visitors concerned about ticks and Lyme disease would prefer to maintain the runways as a tick-free alternative to walking in grassy areas.

Response. We appreciate the thoughtful, heartfelt concerns about removing the runways completely and hauling debris off-site. People at the public meeting shared some great ideas with us. In response to those ideas, we plan to redesign our restoration proposal to a less intensive, less expensive project, but one that still meets the refuge purpose and our priority objective to enhance the area for grassland birds. At this time, we continue to expect some removal of runway material, although not to the extent originally planned. In addition, we will explore all means of recycling or using the debris in a constructive way on-site or in the town park nearby, if town officials are interested. Although we are modifying our plans to be more realistic from a logistical and funding standpoint, we also wish to clarify that, in our professional judgment, even if grasslands birds have adapted to the presence of the runways, their presence affects the biological integrity of the site.

For those who expressed their concern that the depth of the runways would hamper restoration, we offer the results of a survey by a consultant we hired in 2001. Infrasense, Inc. determined that the depth of the concrete and asphalt of the runways averaged between 6.43 and 8.26 inches. If you would like additional information, please contact refuge headquarters to receive a copy of *Shawangunk Grasslands NWR, Ground Penetrating Radar Pavement Thickness Survey Report by Infrasense, Inc. November 29, 2001*.

f. Tree Cutting

Comment: One reviewer expressed concern about our proposal to cut trees that have established themselves in the grasslands and leave only one tree every 10 acres.

Response: In the draft CCP/EA, on page 3-22, we acknowledge that raptors may use those trees for perching and as a base for foraging, and some breeding grassland birds may use them for singing posts. However, we also noted that northern harriers and short-eared owls, our two wintering raptor focal species, primarily hunt while flying, and do not require many trees in their foraging areas.

The presence of the trees hampers the efficiency and effectiveness with which we can manage the grasslands. Our equipment must avoid a 12-foot-wide swath around each tree to avoid hitting it. The costs associated with grassland management increase as tree density increases. We believe our plan to leave one tree every 10 acres is reasonable, and most efficiently achieves our grassland management objectives, which are the highest priority in our biological program. The final CCP includes this management action.

g. Wetlands Restoration

Comment. One reviewer wanted us to restore the artificial pond to wetland habitat as alternative C proposes. That reviewer believes such habitat is in short supply on the refuge, and the cost of restoration would be “minimal.”

Response. Goal 2, objective 2c in the draft CCP/EA (page 3-26), includes recommending an evaluation to determine the extent to which past land use practices affected natural hydrology and wetlands and identify restoration opportunities. We would develop specific projects after considering what is technically feasible, cost-effective, without adverse impact on adjacent private property, and consistent with management for grassland birds and wintering raptors. However, we would not eliminate the pond as long as the refuge manager determines it is providing a viable fishing opportunity.

h. Monitoring

Comment. One reviewer stated that developing a monitoring program to evaluate the effectiveness of our habitat management, especially the response of the bird species targeted, should be a priority. That reviewer states that such a program is important to detect any negative impacts early on and develop plans to reverse them.

Response. We describe our commitment to develop a Habitat and Species Inventory and Monitoring Plan in the draft CCP/EA on page 3-4. That step-down plan is a priority for completion within 2 years of final CCP approval. It will outline the methodology to assess whether our original assumptions and proposed management actions are, in fact, supporting our habitat and species objectives.

i. Expansion of Focus Area

Comment. Some reviewers expressed their desire to expand the focus area of the refuge to include the Wallkill River and a riparian buffer corridor.

Response. We have included that expanded focus area in our final CCP. Please refer to map 1-2 in chapter 1 of the final CCP.

IV. Infrastructure

a. New Trail System

Comment. A reviewer expressed skepticism as to why we were proposing a new trail for the refuge, given its limited resources. In contrast, the Shawangunk Town Supervisor suggested the town and refuge cooperate on a trail project that would include a link between the refuge and the town park.

Response. The Improvement Act identifies, wildlife observation and photography and environmental interpretation as three of the six priority wildlife-dependent recreational 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. The planned interpretive trail, with observation platforms and blinds, would greatly facilitate those activities on the refuge. The trail would be self-guided, thus minimizing the need for a dedicated Service presence.

We fully support the idea of cooperating with the town on that trail project, as well as the suggestion of pursuing grant funding under the partnership. Our final CCP includes this project.

Comment. One reviewer suggested that the proposed trail be located in the archery hunting areas to help provide access.

Response. The priority consideration for the location of the trail is to facilitate wildlife observation of the grasslands while minimizing the impacts on the habitat and species of concern by using the runways to the extent practicable. The location of the trail may also improve access for hunters, but is not a high consideration in its design.

b. Expansion of Parking Area

Comment. Some reviewers opposed expanding the parking area for one of two reasons. First, they believed that the area should stay “natural”. Second, they questioned whether the parking area really needed expansion at all. One reviewer whether the need would ever arise for 20 parking spaces at one time. Another suggested we move the parking area closer to the pond where, in winter, people could stay in their cars and view wildlife.

Response. As we add fishing and hunting programs, we expect the number of refuge visitors to increase. On many weekends, the present lot is full to capacity, and people park their cars on Hoagerburgh Road. That is most likely during peak birding seasons and when local birding clubs host a group trip. We want to ensure

that all visitors at the refuge have safe access to the opportunities it provides. Expanding the parking area will facilitate that access.

In addition, although we describe a “20-car lot size” expansion in the draft CCP/EA, we were really trying to convey a lot size that would allow a school bus to turn around safely. Our latest design actually includes parking for 12 to 14 vehicles and a 3-point turnaround for a school bus. It is true that some additional disturbance of approximately a quarter of an acre will occur when we reconfigure the existing parking area; however, we do not believe it will significantly diminish the naturalness of the area, because it is immediately adjacent to a paved county road and incorporates the present parking area.

Providing parking at the pond to benefit people who view raptors in winter would require us to keep the road open by plowing it. In addition, if this were our primary parking year-round, we would have to create a wide barrier to prevent people in their motorized vehicles from venturing out onto the runways. We do not have the equipment in the area to plow, nor do we want to commit additional funds to a contractor to plow the road, nor do we want to create an additional enforcement concern about people driving off-road. The existing gate location is very effective in keeping motorized street vehicles off the refuge. Unfortunately, we still have a problem with the illegal use of all-terrain vehicles. The final CCP includes the proposal to reconfigure the parking area.

b. Constructing Visitor Contact Station

Comment. Some reviewers opposed the construction of a visitor contact station on the refuge. One found a visitor contact station unnecessary because the refuge is not staffed. Another expressed the desire to keep the area as “natural” as possible and minimize development on the refuge.

Response. We would locate the visitor contact facility we have planned near the pond, on a site already disturbed and leveled just off the asphalt road. Our plan is to place a small, pre-manufactured building, of approximately 1,100 square feet, to accommodate one seasonal staffer, a small office, bathroom, supply room, and a one-bay garage for storing equipment. We believe that development is minimal, and very important in visitor outreach and the administration of this refuge. This final CCP includes this proposal.

V. Refuge Administration, Staffing and Budgets

a. Service Presence on Refuge

Comment. One reviewer wanted the Service to increase its presence on the refuge, and mentioned that, even if refuge staff were not available from day to day, perhaps a volunteer group could play a role in watching over or helping to administer the refuge as an alternative.

Response. We appreciate the interest in increasing the Service presence on the refuge; it is also a concern of ours. However, we do not foresee a change in our budget forecasts over the next few years that would allow us to commit permanent staff to this refuge. As we describe in the draft CCP/EA (page 3-7) and in this final CCP, staff from the Wallkill River refuge primarily will administer the Shawangunk Grasslands refuge. We plan to hire one seasonal staff and promote a Friends Group to help watch over the refuge.

b. Budgets

Comment. Several reviewers commented that the costs estimated in the draft CCP/EA (appendix D) to implement the programs our preferred alternative B proposes are unrealistic, given the forecast of a declining Service budget. Others commented that, despite being a highly specific 15-year plan, its projected costs should be more “nailed down.” Several people commented that we might better spend the cost of restoring 30 acres in purchasing land, since we claim that the loss of important wildlife habitat to development is escalating.

Response. This disclaimer appears on the inside cover of every draft CCP/EA: “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.”

In appendix D, we identify our estimates of costs for our major construction and maintenance projects, including proposed staffing needs and each project’s regional and refuge ranking. As we develop detailed step-down plans or project plans, our estimated costs will change accordingly.

In response to the comment that we should forego a restoration or visitor services project and purchase land instead, it is important to recognize that funding for land acquisition is a separate appropriation. A land acquisition project does not compete with construction, operations, or maintenance projects on a refuge. Those are all separate budget allocations. Congress appropriates the monies to acquire refuge land through the Land and Water Conservation Fund or the Migratory Bird Conservation Fund. In the draft CCP/EA, pages 1-21 and 1-22, we describe why we are not pursuing an expansion of the refuge at this time.

c. Prioritization of Projects

Comment. One reviewer commented that although trails, improved parking, and a visitor contact facility are desirable, those should not come at the expense of grasslands habitat management. He recommended we develop a prioritization of those projects.

Response. We concur that a prioritization should be in place, and apologize for not making it clearer in the draft CCP/EA. The final CCP, appendix D, clarifies the distinctions among the refuge manager’s priorities for the major projects in the CCP.

d. Projected Contributions to the Local Economy

Comment. One reviewer commented that we inflated the predicted contributions of hunter spending to the local economy.

Response. In chapter 4, page 4-10, we based the estimated revenues to the local economy from our proposed hunt program on figures from our National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (USFWS 2001). It includes six tables that detail hunting trip and equipment expenditures in New York. We used the average total expenditures per hunting sportsman as our figure.

However, if we approached it more conservatively, and used the survey’s average hunter trip and equipment expenditures for hunting big game, that figure is \$687 per hunter. The expenditures include food and lodging, transportation, other trip costs, and equipment. In addition, we could also assume that figure applies only to out-of-state hunters, which we estimate would be about 50 percent of our hunters, about 50 percent of the time. Given those more conservative figures, the proposed hunt program potentially could contribute an additional \$100,989 to the state or local economy. Although that figure is much lower than our original estimate in the draft CCP/EA, it would not reverse our plan to offer the fall archery hunt for white-tailed deer.

e. Cultural Resources Protection

Comment. The Historic Preservation Field Services Bureau (SHPO) of the New York State Office of Parks, Recreation, and Historic Preservation wrote to recommend that we consider federal and state cultural resources requirements before conducting any ground-disturbing activity anywhere on the refuge. One reviewer provided us specific annotations on our descriptions of “Cultural Resources” in chapter 2, “Affected Environment.”

Response. We addressed the SHPO comments by agreeing to remove our mention in the draft CCP/EA (page 3-6) that we would focus our activities to comply with the National Historic Preservation Act, Section 106, on the “east corner of the refuge,” which contains less disturbed vegetation. We agree that any undertaking, anywhere on the refuge, will comply with the requirements of Section 106.

Our regional archeologist has reviewed the comments of the reviewer who provided us with edits for our description of cultural resources, and we have included most of them in this final CCP in chapter 3, “Refuge and Resource Descriptions.”

VI. Support for a Specific Alternative

Most people who commented indicated their support for or concern about a particular activity or specific aspects of our preferred alternative B. However, we found it noteworthy that some people either prefaced their comments or summarized them by stating their preference for a particular alternative. Their totals follow.

- Support Alternative A: 5
- Support Alternative B: 17
- Support Alternative C: 0