

Appendix G



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Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for Sunhaze Meadows NWR and Carlton Pond WPA

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Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for Sunkhaze Meadows National Wildlife Refuge and Carlton Pond Waterfowl Production Area

September 2013

Introduction

In April 2013, the U.S. Fish and Wildlife Service (Service, we, our) completed the Sunkhaze Meadows National Wildlife Refuge (Sunkhaze Meadows NWR, the refuge) and Carlton Pond Waterfowl Production Area (Carlton Pond WPA, WPA) Draft Comprehensive Conservation Plan (CCP) and Environmental Assessment (EA). That document outlines three alternatives for managing the refuge and WPA over the next 15 years and identifies alternative B as the “Service-preferred alternative.” We released the draft CCP and EA for public review and comment from April 23 to May 31, 2013.

We evaluated all the letters, email, and phone calls we received during that comment period, along with comments recorded during our two sets of public meetings (four meetings total). This document summarizes the substantive comments we received and provides our responses to them. Based on our analysis in the draft CCP and EA and our evaluation of comments, we made a few minor modifications to alternative B and are recommending this modified alternative B to the Northeast Regional Director for implementation. It is this modified alternative B which is detailed in the final CCP.

We recommended the following modifications to alternative B:

- 1) Under objective 4.1, we agreed to maintain the spur trail off of the Johnson Brook Trail.
- 2) We clarified that we will provide wood duck nesting boxes from existing supplies upon request, as long as volunteers continue to clean, maintain, and monitor use of the boxes. After the existing supply of boxes is depleted, we will phase out artificial wood duck nesting boxes as they deteriorate, or will remove the boxes if volunteers are no longer able to maintain them (see strategies under objective 2.1).
- 3) We added a strategy under objective 6.1 that we will explore the feasibility of and interest in including Benton Unit in a regional trail system upon request.
- 4) We modified a strategy under objective 7.2 to include specific reference to working with universities as well as other partners to identify research and monitoring projects and needs at each refuge unit to foster partnerships.
- 5) We modified language in the boating compatibility determination for Carlton Pond WPA to include monitoring for potential conflicts with other authorized public uses on the WPA (e.g., hunting), and will modify this and other compatibility determinations if warranted.

These changes are not substantive, and none of the changes affect the expected environmental impacts in any significant way. Therefore, we have determined that none of these modifications warrants publishing a revised or amended draft CCP and EA before publishing the CCP.

The Northeast Regional Director will either select the modified alternative B for the final CCP, or one of the other two alternatives analyzed in the draft CCP and EA, or a combination of actions from among the three alternatives. The Northeast Regional Director will also determine whether a Finding of No Significant Impact is justified prior to finalizing her decision. This decision will be made after:

- Reviewing all the comments received on the draft CCP and EA, and our responses to those comments.
- Affirming that the CCP actions support the purpose and need for the CCP, support the purposes for which the refuge and WPA were established, help fulfill the mission of the National Wildlife Refuge System (Refuge System), comply with all legal and policy mandates, and work best toward achieving the refuge's and WPA's vision and goals.

Concurrent with release of the approved final CCP, we will publish a notice of the availability in the *Federal Register*. This will complete the planning phase of the CCP process. Then, we will begin its implementation phase.

Summary of Comments Received

During the comment period, we received comments at three of the four public meetings, as well as written comments, including email and post, from eight individuals. We also received comments from the Maine Department of Inland Fisheries and Wildlife (MDIFW).

Below, we address the substantive comments we received. Comments were organized by subject. Directly beneath each subject heading, you will see a list of unique numbers that correspond to the person, agency, public meeting, or organization that submitted the comment. In some cases, one person may have submitted a comment more than once (public meeting, email, written letter, or telephone). The cross-referenced list appears as attachment 1 to this appendix.

In our responses, we may refer the reader to other places in this document or the draft CCP and EA where we address the same comment. In some instances, we refer to specific text in the draft CCP and EA and indicate how the CCP was changed in response to comments. The full versions of the draft CCP and EA or the final CCP are available online at:

<http://www.fws.gov/northeast/planning/Sunkhaze%20Meadows/ccphome.html>.

For a CD-ROM or a print copy, please contact:

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Service Responses to Comments by Subject

Habitat Management

(Letter ID#: 2, 3, 4, 5, 16)

Comment 1: One commenter believes that there should be no prescribed burning and no logging on the refuge because trees benefit the environment by preventing flooding and erosion, helping to stop climate change and heat islands, and making oxygen.

Response: We agree that maintaining forested habitat on refuge and WPA lands is important. Prescribed burning and tree harvesting are both management tools that are used on national wildlife refuges to create and maintain desired habitats. The Service's preferred alternative (alternative B) includes minimal tree harvesting, since the goal is to maintain mature (late-successional) forest (also, see our answer to the next comment). The purposes of this are to provide a balance of habitats in a landscape where the surrounding forests are being harvested and are therefore generally younger, and to protect the water quality of the wetland complexes at the Sunkhaze Meadows Unit and at Carlton Pond WPA. Alternative B recommends prescribed fire only to maintain grassland at the Benton Unit, in that portion of the field where mowing is impractical because of rocks. We discuss the importance of grassland habitat in the draft CCP and EA under alternative A, objective 3.1 (page 3-27)

Comment 2: One commenter would like us to clarify what we mean by “habitat enhancement” under alternative B, asking if we “seek to ‘promote later successional species through no active management.’”

Response: We do expect to promote mature (late-successional) forest and its accompanying plants and animals largely through no active management; however, there may be instances where some active management would help maintain a healthier late-successional forest. Much of the refuge's forest, particularly in the Sunkhaze Meadows Unit, has been logged prior to Service acquisition. After Service acquisition, portions of these forests were managed to keep them in shrubland and young forest habitats as well. Because of this history, trees in portions of the forest are even-aged. Because the trees in these areas are nearly the same age, a large portion of these trees may stop growing and may even die off at the same time. This results in loss of the cover and other wildlife values previously provided by these blocks of trees. In contrast, trees in uneven-aged stands are expected to die at variable times. Select tree harvesting as a stand ages would provide an older-growth uneven-aged stand, which would be more resilient over time than an even-aged one.

Comment 3: One commenter was opposed to any trapping. One person asked if the trapping program was a management activity or if we were just allowing trapping.

Response: We recognize that there are differing opinions about the role of furbearer management (i.e., trapping) on national wildlife refuges. We consider trapping to be a refuge management economic activity as described in the Code of Federal Regulations (CFR; see 50 CFR 25.12). In chapter 3 of the draft CCP and EA (page 3-10), under “Actions Common to All Alternatives” we explain the role of furbearer management on the refuge and WPA. Maintaining a furbearer

management program provides a mechanism for collecting survey and monitoring information, or contributing to research on furbearer occurrence, activity, movement, population status, and ecology. The ecological and monitoring benefits are management services that are accomplished through minimal or even no cost to the government. In addition, as discussed in the compatibility determination for furbearer management at Carlton Pond WPA and as specified in 50 CFR 31.16, WPAs are open to public trapping unless temporarily closed. For these reasons, we intend to maintain the current furbearer management programs at the refuge and WPA. For additional information on the refuge and WPA furbearer management programs, please see the associated compatibility determinations in appendix B.

Comment 4: One commenter asked if the refuge was doing any habitat management to increase waterfowl habitat at the Sunkhaze Meadows Unit? Was increasing waterfowl production considered?

Response: The Sunkhaze Meadows Unit was acquired under the general authorities of the Fish and Wildlife Act of 1956 and the Refuge Recreation Act of 1962, with the primary purpose of protecting the peat bog domes and Sunkhaze Stream wetland complex. Waterfowl production has never been a primary purpose of the unit, and artificial means of increasing waterfowl production have not been considered.

Although many refuges in the past have used a variety of management techniques, like artificial impoundments, agricultural programs, and artificial nest structures to increase waterfowl production, these techniques are often expensive (e.g., building and maintaining impoundments) and can be counter-productive. The Service's policy on maintaining biological integrity, diversity and environmental health (601 FW3 3.7 E) states that we should "...favor management that restores or mimics natural ecosystem processes or functions to achieve refuge purpose(s)." In a free-flowing wetland complex that was acquired to protect the wetland complex rather than specifically acquired for waterfowl production, we believe that maintaining the natural character of the ecosystem best meets the purposes of the refuge and the mission of the Refuge System.

Comment 5: One individual stated that staff should monitor and inventory the extent of purple loosestrife which has been found in the middle of the Sunkhaze Meadows Unit.

Response: We agree that this is a high priority and have been monitoring and controlling this plant to the best of our ability. Over the past few years, we have worked with the Friends of Sunkhaze Meadows and other partners to control this species through hand pulling and herbicide applications. Monitoring and inventory for invasive species is included within the early detection and rapid response strategy presented under actions common to all of the alternatives (see pages 3-7 and 3-8 in the draft CCP and EA). Controlling this species is also included as strategies under objectives 1.1 and 1.2 (see pages 3-20 and 3-21 in the draft CCP and EA).

Comment 6: One commenter recommended the Service complete a "landscape scale analysis to promote biodiversity" and continue preserving the existing habitats at the Sunkhaze Meadows Unit.

Response: We agree in the importance of looking at the role of the refuge and WPA from a landscape perspective. This is evidenced by the Service's efforts in developing Landscape Conservation Cooperatives (LCCs). During the planning process we consulted a variety of Service and non-Service personnel, in addition to the planning team members and other refuge staff, to ensure we were considering the role of the refuge and WPA from a landscape perspective. For example, Service staff from the Migratory Bird Program assisted us by providing a landscape scale perspective on current and historic habitats in Maine and the North Atlantic LCC along with recommendations on what habitats Sunhaze Meadows NWR might be in the best position to provide specifically from this regional perspective. We also discussed landscape level issues in chapter 4 of the draft CCP and EA, under the cumulative impacts analysis.

We also agree it is important to preserve the habitats at the Sunhaze Meadows Unit. All three alternatives focus on protecting the unique domed bogs and peatlands of this unit. While all three alternatives also protect the forest and other habitats, we believe the final CCP best protects all of the refuge and WPA habitats and allows the refuge to best contribute to natural resource conservation at a landscape scale.

Comment 7: One individual asked how the Service would be able to meet the actions common to all alternatives or the objectives under goal 1 under any of the alternatives, given the absence of staff and any biological or ecological research.

Response: Strategies presented in the various alternatives are predicated on staff and funding levels associated with those alternatives. CCPs are for planning purposes and do not constitute a commitment of resources. Service staff will continue to work with volunteers and other partners to accomplish as many of the goals and objectives as possible using the available resources.

Comment 8: One individual asked if we could describe what protocols we are using to specifically accomplish the following actions: (a) monitoring and controlling invasive species, (b) furbearer management, (c) monitoring and abatement of diseases, (d) facilitating or conducting biological research and investigations; (e) protecting cultural resources; (f) providing wildlife-dependent recreational opportunities, and (g) completing findings of appropriate use and compatibility determinations.

Response: The Service is required by law and policy to meet several of these obligations. We do use or are developing standardized monitoring protocols for some of these categories. Other resources are monitored regularly but we have not necessarily developed protocols. For example, we are aware of the location of several archaeological sites within the refuge. Service staff, usually a law enforcement officer, routinely visit the refuge to look for unauthorized access and public uses, including disturbance of these locations. We would include any future sites in this effort, if discovered.

The Service has recently dedicated funding for a national inventory and monitoring program. Our regional inventory and monitoring staff are working with academic partners, Service staff, and others to identify standard inventory and monitoring protocols that can be implemented in refuges across the Service's Northeast Region and the nation, so that we can compare data

collected at different locations. This process is ongoing. We will incorporate the results of these efforts into our inventory and monitoring step-down plan (see page 3-16 of the draft CCP and EA) as they become available and as resources allow.

Of course, meeting all of these obligations is difficult given current limits on resources. The staff at Maine Coastal Islands NWR attempts to meet the highest priority obligations for Sunhaze Meadows NWR and Carlton Pond WPA as best it can, while also meeting obligations at the coastal refuge. We also recognize the need for additional resources to accomplish the increased activity proposed in alternatives B and C.

Comment 9: One individual asked how we know that the refuge and WPA are relatively free of invasive species, and what were we comparing them to.

Response: The refuge manager at Maine Coastal Islands NWR was one of the founding members of the Invasive Plant Atlas of New England (IPANE; <http://www.eddmaps.org/ipane/>), and has traveled extensively throughout New England and controlled invasive plants in several states. She was heavily involved in the development of the Connecticut River Watershed/Long Island Sound Invasive Control Initiative Strategic Plan (USFWS 1999), which looked at the distribution of invasive plants across the landscape and what various states were doing to control or encourage the control of them. This effort found that, in general, Rhode Island, Connecticut, and Massachusetts habitats had a much bigger problem (more species, more robust individual plants, more percent cover) than habitats in Vermont and New Hampshire. Maine is similar to Vermont and New Hampshire. This does not in any way diminish the seriousness of invasive plant infestations nor the need to eradicate or control them, wherever they occur.

Comment 10: One person asked if changing (raising) the water level in Unity Pond would affect Carlton Pond WPA.

Response: Since Carlton Pond WPA is upstream from Unity Pond, and water levels are kept above Carlton Stream by a dam, we do not believe Carlton Pond would be affected by raising water levels at Unity Pond.

Comment 11: One person commented that Carlton Pond is getting shallower because of sedimentation and low water at certain times of year and asked if there is a way for the Service to address this.

Response: All dams slow the water behind them, causing the sediment being transported in the water to settle out. Dredging the sediments is extremely difficult and expensive. Although shallow areas can be an impediment to recreation, shallow marshes can be very productive habitats. At Carlton Pond, much of the thick vegetation in the shallow water near the inlet on Bog Road is wild rice, a highly desirable waterfowl food. At this time, we do not believe there is a wildlife or habitat benefit to removing sediment from Carlton Pond, so we have no plans to do so.

Comment 12: One person asked what is the Service doing with duck boxes at Carlton Pond WPA and if they could get replacements.

Response: As an agency, the Service is moving away from the use of artificial nesting boxes for cavity-nesting ducks. Instead, we are focusing our efforts on improving available nesting habitat.

For over 13 years, Carton Pond WPA has had an active volunteer program (several groups or individuals) that have maintained, cleaned, and documented the use of the nesting boxes. These volunteers have used the wood duck boxes as a way to get people outside and interested in their neighborhood and the environment. While there is an active volunteer program to annually clean and maintain the boxes, the refuge staff will continue to provide the remaining wood duck boxes it has in its inventory upon request. Because of limited resources and the agency's movement away from artificial nesting boxes, we do not anticipate supplying additional nest boxes once our current inventory is exhausted. If wood duck boxes are not maintained and cleaned, the boxes would then be removed. We have clarified this by adding two strategies addressing artificial wood duck nest boxes under objective 2.1.

Refuge Administration and Infrastructure
(Letter ID#: 1, 2, 3, 4, 5, 10, 14, 16)

Comment 13: One commenter was opposed to exchanging any refuge or WPA lands for other, currently private, lands.

Response: The Service may exchange federally owned land for private lands. Per Service policy (342 FW 5), the land exchange must be of benefit to the United States, and the value of the lands or interests in lands must be approximately equal or values may be equalized by the payment of cash by the grantor or by the United States. As with other Service actions, land exchanges are subject to a variety of other requirements including compliance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347; NEPA). We do not foresee proposing any land exchanges for the refuge or WPA at this time. If this changes, we will conduct whatever level of additional NEPA review is warranted.

Comment 14: One commenter asked if private landowners still pay taxes on property that is under a conservation easement?

Response: Yes, after a conservation easement is established landowners are still required to pay property taxes on the remaining value of their land. They no longer pay property taxes on the value of the easement.

Comment 15: One commenter was opposed to allowing mining, private grazing of livestock, water diversion, or other commercial uses of the refuge and WPA.

Response: We consider these uses to be economic uses. As stipulated in 50 CFR 29.1, "We may only authorize public or private economic use of the natural resources of any national wildlife refuge...where we determine that the use contributes to the achievement of the national wildlife refuge purposes or the National Wildlife Refuge System mission." We have not proposed any of these specific activities mentioned by the commenter under any of the alternatives in the draft CCP and EA, so we do not anticipate authorizing these uses at this time. We have authorized the

following economic uses of the refuge and WPA: haying, trapping, and commercial guiding for hunting, fishing, wildlife observation, photography, environmental education, and interpretation. As specified in the compatibility determinations for these uses, we have found that these uses contribute to achieving the purposes of the refuge and WPA and the mission of the Refuge System.

If we determine that authorizing other economic uses of the refuge and WPA may be warranted, we would need to prepare a finding of appropriateness and compatibility determination for each use, and provide opportunities for additional public review and comment before opening the refuge or WPA to these uses. These documents would need to specify how the use would contribute to achieving refuge purposes or the Refuge System mission.

Comment 16: Several commenters were in favor of dedicated staff for the refuge and WPA.

Response: Thank you for your support. We have proposed additional staff under alternatives B and C; however, the CCP is developed for planning purposes only and does not constitute a commitment of resources. Additional staff and associated funding will depend on the Service's budget and Northeast Region budget allocations.

Comment 17: One commenter was opposed to any new trails or roads. Another commenter was opposed to any new development of refuge or WPA lands for human use.

Response: The purpose of the CCP is to develop a management direction that best achieves the refuge and WPA purposes; attains the vision and goals developed for the refuge and WPA; contributes to the Refuge System mission; addresses key problems, issues, and relevant mandates; and is consistent with sound principles of fish and wildlife management. Additions to the refuge's trails and parking areas proposed under alternatives B and C are relatively minor. We have proposed these additions to improve the quality of visitor experiences and in some cases improve visitor safety. No new roads are proposed under any alternative.

Comment 18: One commenter stated that, with the speed on the County Road and the deep ditches, additional parking areas are a good idea. Another commenter noted that the barrier logs around the parking lot boundaries are rotting – these don't look good to the public and need to be removed.

Response: Thank you for your support for our proposal to add additional parking areas to allow people to access hiking trails without walking on the County Road. We have already removed the barrier logs that were mentioned.

Comment 19: One commenter stated that the right side of the Carter Meadows Loop was a hazardous and difficult trail. Therefore, maintenance on this side of the trail should be discontinued.

Response: We agree that this area is wetter and is more difficult to maintain than the other side; however, visitors enjoy loop trails and this trail was identified as one of the more popular trails during public scoping for the CCP. For these reasons, we plan to maintain the existing trail.

Comment 20: One commenter was not sure if it was worth the money to make improvements at Ash Landing because this access to the stream is rarely used.

Response: We do not have exact quantitative data on the amount of use this trail and boat access gets; however, it is the only access to Sunkhaze Stream on refuge land and was one of the top three most popular trails identified during public scoping for the CCP. We use this area to access the stream for management purposes, including checking for invasive species like purple loosestrife. The improvements planned for Ash Landing will facilitate public access as well as refuge management access, and we intend to continue to maintain it for the use of boaters, anglers, and refuge staff.

Comment 21: One commenter would like the Service to maintain the Birch Grove spur off the Johnson Brook Trail as far as the boardwalk because the boardwalk is still in good condition, it provides a unique view of a swampy area, and it provides access to an interesting old farm site.

Response: The refuge manager revisited this spur with the commenter. We agree with the commenter's assessment that the spur trail is still in good condition and we have modified alternative B to include maintaining this spur trail off Johnson Brook Trail.

Comment 22: One commenter stated that the South Buzzy Brook Trail is not useful to visitors because it is wet and over-grown.

Response: We agree. This is one of the reasons we are recommending we stop maintaining this trail.

Comment 23: One commenter believes that we have inaccurately assessed the condition of the North Buzzy Brook Trail in the draft CCP and EA. The commenter states that there are a few wet areas, but these could be easily bypassed and most of the downed trees are cleared. He requested we contact him to discuss ideas for resolving problems with this area. Two other commenters requested we continue to maintain the Buzzy Brook Trails. One commenter asked if the issue was money, and suggested we use volunteers to maintain these trails.

Response: There are several issues with maintaining the Buzzy Brook Trails. There is a lack of guaranteed, year-round public access on the Stud Mill Road, which is a private road with gates that are closed in spring, when the road is wet and muddy. There is no safe parking for that trail; cars must park on the Stud Mill road (unsafe due to logging truck traffic), or block the McLaughlin Road gate (not allowed) except when the McLaughlin Road gate is open during hunting season. The only way to solve this would be to move the McLaughlin Road gate further down the road, beyond the small parking pull-off near the trail. If we did this, the parking area would not be visible from a frequently traveled road; which often leads to problems with illegal dumping and other unauthorized activities. Keeping these trails cleared of down trees and properly maintained is labor intensive and, as discussed in the draft CCP and EA (see page 3-64), these trails are already largely impassable and are among the least used. Even with proposed additional staff in alternative B, we believe maintaining these trails is not the best use of limited resources.

Comment 24: One commenter would like to have more trails at the Benton Unit, and asked if the Service would be willing to include the existing snowmobile trail at the Benton Unit in a regional trail system.

Response: We support the addition of a small connector trail as described under alternative B in the draft CCP and EA. We would be happy to work with a regional group to explore the feasibility of including the Benton Unit trails in a regional system, and have added this as a strategy under objective 6.1. We may need to revise one or more of the compatibility determinations and evaluate how best to patrol and maintain the trails if they start to get much more use.

Comment 25: One commenter asked if some money could be shifted from Maine Coastal Islands NWR to Sunkhaze Meadows NWR. Another commenter asked where our estimates of staff time (5 percent under alternative A) and maintenance budget originated, if there were accounted for formally, and if this could change. This individual supported a CCP that involved greater staff time from Maine Coastal Islands NWR Complex or preferably Moosehorn NWR, stating that an increase as small as 5 percent “would help implement much needed programs at Sunkhaze Meadows, and satellite units.”

Response: The budget for Maine Coastal Islands NWR includes the salaries of its eight employees, about 20 percent more for management capability (e.g., on-the-ground work), and funds to pay for rent of its facilities. Sunkhaze Meadows NWR and Carlton Pond WPA were complexed with Maine Coastal Islands NWR to save funding. At that time, all of the funding for Sunkhaze Meadows NWR and Carlton Pond WPA was reallocated such that \$5,800 was added to the Maine Coastal Islands NWR budget for maintenance costs and remaining funds were used to offset budget cuts. We have stretched our staff and resources to try to cover the additional responsibilities, but this is difficult. Maine Coastal Islands NWR is responsible for 59 islands from New Hampshire to Canada plus four mainland units, and run active seabird restoration projects on seven islands which are staffed 3 months of the year. Travel time also makes managing the refuge difficult since both of the Maine Coastal Islands NWR offices are about 2 hours away.

We based our estimate of 5 percent of the average time our staff spends at Sunkhaze Meadows NWR and Carlton Pond WPA on self-reporting of refuge staff. We do not formally keep track of how much time each employee spends on these areas, so actual time may be more or less. Some staff, including our law enforcement officer, our full-time and seasonal maintenance people, and the refuge manager spend much more than 5 percent of their time on projects related to Sunkhaze Meadows NWR and Carlton Pond WPA, while other staff spend less. Service staff struggle to complete the highest priority activities at both refuges. In the past few years, we have patrolled Sunkhaze Meadows NWR weekly, supervised large crews of volunteers to improve trails and to help us maintain boundaries, controlled purple loosestrife along the County and Stud Mill Roads, met with the Friends group regularly, and worked diligently on this plan. We are also planning to replace all the old signs with new ones. It is within the refuge manager’s purview to reallocate some resources, including staff time, within their existing budget. We agree that additional time and resources would benefit Sunkhaze Meadows NWR, but this would divert resources from

high priority projects at Maine Coastal Islands NWR. For this reason, we do not anticipate diverting additional resources from Maine Coastal Islands NWR to Sunkhaze Meadows NWR.

Public Use and Access

Public Use

(Letter ID #: 1, 2, 14, 16)

Comment 26: One commenter stated that the refuge and WPA should be closed to overland vehicles such as all terrain vehicles (ATVs), unless needed for research.

Response: The Refuge Improvement Act and Service policy require us to develop findings of appropriateness and compatibility determinations for public uses such as overland vehicles. We recognize that overland vehicles may adversely affect refuge and WPA resources. To date, the only public overland vehicles use allowed on refuge lands is snowmobiling. This use is authorized on only a few designated trails, and is limited to winter months when adequate snow is present and disturbance to habitats and wildlife is minimal. Use of other overland vehicles is limited (e.g., occasional refuge management activities, snowmobile trail maintenance through a special use permit). The refuge and WPA are currently closed to general ATV use and other similar uses, and we have not proposed opening the refuge to these uses under any of the alternatives. As discussed previously, if we determine that authorizing these types of public uses may be warranted, we would need to prepare a finding of appropriateness and compatibility determination for each use, and provide opportunities for additional public review and comment before opening the refuge or WPA to these uses. These documents would need to specify discuss the impacts of allowing a use and how the use would not materially interfere with or detract from the refuge or WPA purposes or the Refuge System mission.

Comment 27: One commenter asked if the small, square, refuge boundary signs (the ones that say “No Unauthorized Access”) along the road would be changed? They make people think they can’t go onto the refuge.

Response: We agree that the wording of these signs can be confusing, particularly for new visitors. These are standard refuge boundary signs used throughout the Refuge System, so any changes to these signs would need to be approved at the national level. To try to alleviate this confusion, we are developing new interpretive signs that include an explanation of the boundary sign language and lists of what uses are authorized and some uses that are prohibited.

Comment 28: One commenter asked if we could create another access point to the Sunkhaze Meadows Unit and Sunkhaze Stream, preferably along State Route 2.

Response: We agree that providing additional access points to Sunkhaze Stream would facilitate participation in authorized public uses at the Sunkhaze Meadows Unit. As stated under alternative B, objective 4.1 of the draft CCP and EA, we intend to work with willing landowners to establish boat access on lands and waters near or adjacent to the refuge, including exploring opportunities to develop boat access points along Sunkhaze Stream near its mouth as well as

upstream, and if feasible, on tributaries. State Route 2 is near the mouth of Sunkhaze Stream, and is one of the areas where we would like to establish access.

Comment 29: One commenter would like refuge staff to “train members of the Friends group to do the work that is not being done to maintain public access in places, in the absence of permanent staff.”

Response: We are grateful for the support of our volunteers. Currently, several volunteers pick up trash and re-stock brochures for us, and alert us to acts of vandalism that have taken place. Training volunteers to complete other maintenance tasks and having them operate unsupervised by Service staff is more complicated. Some tasks, such as trail maintenance, often involve the use of potentially dangerous equipment (e.g., chain saws, hand saws). To ensure any volunteers that may be accidentally injured are covered, we would need to implement a formal training program and enter into a formal agreement with a volunteer group or group leader. We are not aware of any group or group leader that is interested in taking on this responsibility at this time.

Comment 30: One commenter suggested that the Service could build some relationships with the University of Maine, Orono, to engage students and interns in helping. This commenter noted that years ago there was a summer internship program with the University of Maine and asked if there is a way to reestablish that? Another commenter suggested we get Milford School involved, perhaps a visit Sunkhaze Meadows day. They asked if refuge staff could help with such a day?

Response: We agree that building relationships with the University of Maine and other partners would be beneficial. We have modified the strategy related to identifying research and monitoring projects under objective 7.2, to include universities as a specific partner. Refuge staff would be willing to assist the Milford School, if the school requested it.

Hunting and Fishing **(Letter ID#: 4, 5, 11, 12, 13, 14, 15)**

Comment 31: One individual expressed opposition to allowing any hunting on the refuge and WPA.

Response: We understand there are differing opinions about the role of hunting on national wildlife refuges. Hunting is an historic use of refuge and WPA lands. As discussed in the draft CCP and EA, there are many laws, policies, establishment documents, and other mandates that we used to guide public use programs on the refuge and WPA. We considered these mandates and other factors, and determined that reducing or eliminated hunting would not meet the purposes of the CCP. Please see “Actions Considered but Eliminated from Further Study,” (page 3-5) in the draft CCP and EA for a more detailed explanation.

Comment 32: Several individuals expressed support for continuing to allow hunting on the refuge and WPA.

Response: Thank you for your support.

Comment 33: Several commenters expressed support for continuing to allow fishing on the refuge and WPA.

Response: Thank you for your support.

Comment 34: One commenter recommended we close portions of the refuge and WPA with the most plant and animal diversity to hunting, particularly areas with threatened or endangered species.

Response: We agree that it is important to protect the biological diversity of the refuge and WPA, particularly rare habitats and species. Most of the refuge's and WPA's sensitive plant and wildlife species are found in the bogs and wetland areas, which are generally difficult for visitors to access. Hunting is a wildlife-dependent public use of the Refuge System specified in the Refuge Improvement Act, and is to receive enhanced consideration. Federal law and Service policy require that we complete compatibility determinations for wildlife-dependent public uses. We have completed compatibility determinations for hunting for the refuge units and the WPA. Based on the analysis presented in those documents (see appendix B), we do not believe it is necessary to protect refuge and WPA resources by closing sections of the refuge or WPA to hunting at this time. We will continue to monitor for potential impacts to refuge resources, and will make revise our compatibility determinations as needed to protect refuge and WPA resources. This could include closing sensitive areas if needed.

Comment 35: One commenter believed that we had made a mistake and that the Sunkhaze Meadows Unit does lie within one of the State's priority target areas for deer management, where intensive coyote hunting is encouraged.

Response: MDIFW has encouraged coyote hunting in northern, eastern, and western parts of the State in an effort to increase the deer population in these areas. The Sunkhaze Meadows Unit is near, but outside of, the boundary of the northern area identified by MDIFW. We worked closely with the representative from MDIFW that is on our planning team to ensure we interpreted these boundaries correctly. He confirmed that the Sunkhaze Meadows Unit does not lie within any of the current State target areas for deer management.

Comment 36: One commenter noted that he had experienced conflicts with non-hunting boaters on the WPA. He recommended we limit recreation boating and fishing during waterfowl hunt seasons to avoid conflicts with waterfowl hunters. This commenter suggested fishing and recreational boating could be limited to between 11 a.m. and 3 p.m. to minimize potential conflicts and enjoy the pond. This commenter also recommended education of non-hunting visitors to help alleviate conflicts.

Response: We are aware that a small number of users have reported conflicts when participating in wildlife-oriented recreation at Carlton Pond WPA. To date, we have received few reports of conflicts between boaters and hunters and Service staff have not observed conflicts; therefore, we believe these conflicts currently occur infrequently. However, we recognize that this may

change over time. We have modified language in the boating compatibility determination for Carlton Pond to read as follows:

We will continue to monitor for conflicts among users. If we determine conflicts among users are sufficient to cause safety concerns or affect the overall quality of visitor experiences, we will reevaluate the relevant compatibility determinations and may modify them to reduce conflicts or ensure public safety. Actions we may take to minimize conflicts among user include: (1) providing additional education and outreach, or (2) separating user groups spatially (i.e., different parts of the WPA are open to different activities) or temporally (the WPA would be closed to certain activities at certain times of day or during certain seasons).

Alternatives

General Comments

(Letter ID#: 5, 14, 16)

Comment 37: One individual commented that none of the alternatives adequately protected wildlife and wildlands, and requested a reconsideration of alternatives or a recombination of alternatives that should be evaluated by an independent scientific panel.

Response: From the comment, it is unclear which aspects of the alternatives the commenter believes are not adequate for protecting natural resources of the refuge. The Refuge System mission, Service policies on appropriateness and compatibility of public uses, and Service policy on biological integrity, diversity, and environmental health are all intended to protect natural resources. Throughout the planning process, we have looked to these and consulted with a variety of experts to help develop the alternatives that ensure refuge and WPA resources are protected. We believe alternative B, as amended, adequately protects refuge and WPA natural resources.

Comment 38: One individual wrote, “I am concerned that there are no true alternatives here, as both Alternative B and C are contingent on staff, which is beyond the control of the USFWS currently.... I support an ADDITIONAL alternative that would include re-directing a portion of the staff time from Maine Coastal Islands NWR to conduct some very basic monitoring, inventory, and maintenance activities at Sunkhaze Meadows as described in Alternative B.”

Response: During the last round of staff reductions to adjust to flat budgets over a period of years, Service supervisors decided to de-staff Sunkhaze Meadows NWR. As already mentioned (see response to comment 25), the staff at Maine Coastal Islands NWR was required to pick up the additional responsibilities at Sunkhaze Meadows NWR, and have tried their best to prioritize and accomplish essential activities for Sunkhaze Meadows NWR. We agree that additional time and resources would benefit Sunkhaze Meadows NWR and that maintenance, inventory, and monitoring are important. Alternatives B and C in the draft CCP and EA reflect this, as does the final CCP. Service leadership could choose to add staff by reassigning existing staff (including staff from Maine Coastal Islands NWR) or by hiring new staff. At this time, Service leadership has determined that reallocating resources would divert resources from high priority projects at

other refuges. For this reason, we do not anticipate diverting additional resources from Maine Coastal Islands NWR or other refuges to Sunkhaze Meadows NWR. However, this may change.

Comment 39: One commenter expressed support for Wild and Scenic River designation.

Response: Thank you for your support.

Alternative A
(Letter ID#: 4, 5, 16)

Comment 40: One individual expressed support for alternative A.

Response: We appreciate your support for our current management.

Comment 41: Another individual commented that alternative A appeared to be the easiest alternative without current staff and hoped that if alternative A was selected, the Service would have a reason aside from it being the “easiest.”

Response: The National Environmental Policy Act requires that a range of alternatives be presented, including a “No Action” alternative. In this case, our “No Action” alternative is alternative A, representing “no change from the current management.”

As, stated in chapter 1 of the draft CCP and EA and the final CCP, our intent was to develop a CCP that best meets refuge and WPA purposes, the Refuge System mission, and the goals, that is based on sound science. Decisions about the final CCP will be based on these criteria.

Alternative B
(Letter ID#: 14, 17)

Comment 42: One commenter did not fully support any alternative, but preferred alternative B over the other alternatives presented. Another commenter supported alternative B.

Response: It is not clear from the first comment which aspects of the alternatives the commenter did not support. We appreciate the support for alternative B.

Alternative C
(Letter ID#: 2, 4, 5, 16)

Comment 43: Two commenters expressed opposition to alternative C because of the proposed early successional habitat management, in particular at the Sunkhaze Meadows Unit. However, one of these supported additional visitor services proposed under this alternative.

Response: We appreciate these comments. We agree that the most valuable contribution the Sunkhaze Meadows Unit can make to the landscape is providing mature (i.e., late successional) forest and protecting the peat bog. We agree that additional visitor services programs would be beneficial; however, we believe visitor services, habitat management, and monitoring and

inventory efforts proposed under alternative B, as amended, best meet the purposes of the refuge and the mission of the Refuge System.

Comment 44: One commenter complimented the planning team on the alternatives that were developed. This commenter preferred alternative C, but thought alternative B was good as well.

Response: Thank you for your support.

Planning Process and Policy

CCP Process

(Letter ID#: 1, 2, 16)

Comment 45: One individual disagreed with our proposed action to “develop a CCP...that guides refuge management...” This individual believes “this is inconsistent, as ‘management’ implies manipulation or directed manipulation for an intended purpose.” Instead, this person believes that “administration” would be more appropriate, given the lack of staff and lack of active habitat management. This individual stated that it appears that “...the Friends of Sunkhaze group...are the only folks doing anything for the refuge formally (outside of maintenance of fallen signs, etc.)”

Response: Given the context of this comment, we believe the commenter is primarily focused on the Sunkhaze Meadows Unit of the refuge. We agree that the Friends of Sunkhaze Meadows are instrumental in helping the refuge, and we are grateful for their support. We also recognize that the lack of staff has reduced our ability to manage the refuge and WPA. When we use the term “manage” we are referring both to habitat management, monitoring, and management of public uses and infrastructure. We do currently manage water levels at Carlton Pond WPA to benefit migratory waterfowl and the State-listed black tern, we also work with a cooperative farmer to maintain portions of the grasslands at the Benton Unit, we complete prescribed burns to maintain the remaining grasslands there, as well as treating portions of the Sandy Stream Unit to maintain it as shrubland habitat. The refuge law enforcement officer also works with other law enforcement personnel and other refuge staff to manage public use on the refuge and WPA. Under all alternatives, we would maintain some form of resource and public use management, even without additional staff.

Comment 46: One individual stated, that it “appears that there will be action items possibly associated with the CCP - but it was my understanding that these would be included in the CCP...There are many ‘action items’ described in the document, but no current plan to accomplish these.”

Response: The draft CCP and EA is intended to provide enough detail on all aspects of refuge and WPA management to inform refuge staff, other agencies, our partners, and the public what each alternative would entail as well as associated effects. Given the breadth of this document, it is not feasible for us to include day to day operational detail in this document. As discussed in chapter 1 of the draft CCP and EA, there are up to 25 step-down plans we may prepare to provide additional detail for day to day management of the refuge and WPA. In chapter 3 of the

draft CCP and EA (see page 3-15), we identified a subset of those plans that are a priority for us to complete as well as a timeline for when we hope to complete them.

Comment 47: On commenter asked, “Even if we like alternative C better, does the plan translate into additional resources?”

Response: CCPs do not constitute a commitment for staffing increases, or funding for operations, maintenance, or future land acquisition. Implementation is adjusted annually given the reality of budgets, staffing, and unforeseen critical priorities.

Comment 48: One individual asked if the Service could “propose an alternative that is essentially Alternative A, with some of the tasks involved in Alternative B, with a commitment of more staff time” from Maine Coastal Inlands NWR Complex or Moosehorn NWR?

Response: Our Regional Director may choose any of the alternatives, or some combination of alternatives, for the final CCP. While two of the alternatives specify additional staff and propose projects that would require additional funding, we have flexibility in how we implement these. Refuge managers do have authority to reallocate their existing resources, including staff time, and refuge supervisors could move oversight of Sunkhaze Meadows NWR and Carlton Pond WPA to another staffed refuge such as Moosehorn NWR.

Comment 49: One commenter was concerned that the lack of attendance at the public meetings meant there would not be many comments or much support for the refuge.

Response: We are grateful for the support and comments we have received at the refuge units and WPA and throughout the planning process.

Comment 50: A few people at one of the public meetings noted that they had not received an announcement about the public meetings. They asked how we notified the public and noted that we should have been sure to send information to all of the people who signed in at the Wilderness public meeting held in February 2012.

Response: We apologize for this oversight. Contact information for 17 new contacts was inadvertently left off our mailing list. We have rectified this error, and mailed copies of newsletters to each of these people on May 1, 2013, 30 days before the comment period ended.

Comment 51: One person asked about the status of the proposed East-West Highway and how it would affect the refuge.

Response: We are aware of the discussions around a proposed East-West Highway. We are working to stay informed of the process. However, it is not a Federal or Service activity; therefore, it is outside of the Refuge System’s jurisdiction provided it does not cross Service-owned lands.

Comment 52: A few people at one of the public meetings thanked the refuge manager and refuge staff for involving the town in the planning process and responding to public input at the public meetings.

Response: Thank you. We value our neighbors and partners and are committed to working together.

References

U.S. Fish and Wildlife Service (USFWS). 1999. The Connecticut River Watershed-Long Island Sound Invasive Plant Control Initiative: Strategic Plan. Silvio O. Conte National Fish and Wildlife Refuge.

Attachment 1. Comment Identification (ID) Numbers and Respondents

Comment ID Number	Name or Public Meeting Date and Time
1	April 25, 2013, 2:00 to 4:00 p.m. meeting, Milford, ME
2	April 25, 2013, 4:00 to 6:00 p.m. meeting, Milford, ME
3	April 26, 2013, 3:00 to 5:00 p.m. meeting, Unity, ME
4, 5, 6, 7, 8, 9	Jean Public
10	Rodric C. Johnson
11	Leo Cournoyer
12	John Benge, Sr.
13	Meghan Hassele
14	Stefan Kodet
15	Dr. Bill Cunningham
16	Lindsay Seward
17	Maine Department of Inland Fisheries and Wildlife

