The Planning Process

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The Comprehensive Conservation Planning Process

Service policy (602 FW 3) establishes an eight-step comprehensive conservation planning process that provides guidelines for developing CCPs and facilitates compliance with NEPA by integrating NEPA compliance requirements in the CCP process (figure 2.1). The full text of the policy and a detailed description of the planning steps can be viewed at: http://policy.fws.gov/602fw3.html (last accessed September 2012).

The following describes the specific process implemented by the Sunkhaze Meadows NWR and Carlton Pond WPA planning team, including how others were engaged in developing issues for the CCP.

This summary does not detail the numerous meetings, events, and informal discussions the refuge manager and staff have had since January 2011 where the CCP was a topic of conversation. Those involved a wide range of audiences, including conservation groups, elected officials or their staffs, educators, refuge visitors, and other interested individuals. During those discussions, the refuge manager and staff provided an update on CCP progress and encouraged comments and participation.

Figure 2.1. The Service’s Comprehensive Conservation Planning Process
Chronological Summary of CCP Process

Step A: Preplanning
Several steps were initiated as part of “Step A: Preplanning” including the formation of the core planning team which is responsible for developing the CCP. Our core planning team consists of refuge staff, Regional Office staff, a representative of the MDIFW, a representative of the Penobscot Indian Nation, an elected representative from the Town of Milford, and contractors responsible for compiling information and preparing documents. The CCP planning process began formally on January 4, 2011, with a conference call between refuge staff, Regional Office staff, and contractors to discuss information needs, timelines, and involvement of others in the core planning team. As part of the preplanning process, the core planning team discussed management issues, drafted a vision statement and tentative goals and compiled a project mailing list of known stakeholders, interested individuals, organizations, and agencies. The team also began work on Wilderness and Wild and Scenic River reviews and summarizing the refuge’s biological inventory and monitoring information.

On March 1, 2011, a conference call was held between refuge staff, regional Service staff, and contractors to work on the preparations for the agency and Tribal partnership scoping meeting, as well as the public scoping meetings.

On March 7, 2011, the refuge manager emailed 29 local, county, State, and Federal agency contacts an invitation to an agency partner scoping meeting. This invitation encouraged agency participation in the agency scoping meeting in order to provide other government entities the opportunity to share their issues and concerns related to Sunkhaze Meadows NWR and Carlton Pond WPA. A follow-up reminder email was sent to this same group of contacts on March 17, 2011.

Step B: Public Scoping
On March 18, 2011, we started “Step B: Initiate Public Involvement and Scoping” by publishing the Notice of Intent in the Federal Register, officially announcing the beginning of public scoping for the Sunkhaze Meadows NWR and Carlton Pond WPA CCP. The project planning Web site and the refuge Web site were also updated at this time.

On March 23, 2011, the core team contacted approximately 394 individuals and organizations included in the planning contacts database compiled for the CCP. The refuge manager emailed 44 of those contacts inviting them to participate in our scoping process and to attend our public open houses in April and included an electronic copy of the first newsletter. The remaining 350 contacts were mailed paper copies of the first newsletter containing a similar invitation to participate.

On March 24, 2011, the core team held the agency scoping workshop at the MDIFW, Bangor Research Office. The workshop was attended by six representatives from municipal, State, and Federal agencies. Refuge and planning team staff were also in attendance at the meeting.

The core team completed their public scoping meetings in mid-April. Two public scoping meetings were held on April 12, 2011, in Milford, Maine, at the Milford Town Hall: one session
was held from 2 to 4 p.m., and another session was held from 6 to 8 p.m. Combined, these meetings were attended by 22 individuals from the surrounding communities. A third public scoping meeting was held from 4 to 8 p.m. in Unity, Maine, at Unity College on April 13, 2011. This meeting was attended by 12 individuals. Refuge and planning team staff were also in attendance at all three meetings.

The official comment period for initial public scoping to identify issues and opportunities for the CCP ended on April 30, 2011.

**Steps C and D: Vision, Goals, and Alternatives Development**

Following the public scoping period, the core team compiled and summarized all comments received. In doing so, the Service initiated “Step C: Review Vision Statement and Goals and Determine Significant Issues.” Through a series of conference calls and emails, the core team reviewed comments received and identified key issues to be addressed throughout the development of the CCP. At the same time, the core team evaluated the draft vision and goals presented during scoping. During this evaluation, the core team decided to reorganize the draft goals to better reflect the individuality of each refuge unit. This was motivated by two primary factors: (1) many individual comments received during scoping pertained to particular refuge units and people’s interest in a particular unit, and (2) each refuge unit and the WPA contain unique habitats and features and are managed individually.

From August 2012 through January 2013 the core team worked on “Step D: Develop and Analyze Alternatives.” On August 9 and 10, the core team met in person at the Service’s Ecological Services Office in Orono, Maine to discuss key issues and develop appropriate management considerations.

As part of this initial development of alternatives, the core team considered management alternatives at the Sunkhaze Meadows Unit that included special use designations such as wilderness area or research natural area. To further evaluate special designations as alternatives, in January 2012, we distributed a public notice and newsletter describing the consideration of special designations, specifically wilderness area designation and invited interested individuals to attend a public meeting to learn more about the consideration and obtain public input. This newsletter was distributed to 452 contacts, 112 of whom received the newsletter via email, and the remaining 340 were mailed hard copies. The public notice was also published on February 3, 2012, in a local newspaper, the SV Weekly.

The Sunkhaze Meadows Unit wilderness consideration public meeting was held on Thursday, February 9, 2012, at the Milford Town Hall. In total, 38 people from the general public attended the meeting. The refuge manager described the purpose of the meeting, the current status of our CCP and EA planning efforts, and the Wilderness Act criteria and how the Service delineated the potential wilderness area designation for the Sunkhaze Meadows Unit. The Service then facilitated public input while recording the comments on flip charts.
Following this meeting, the Service reviewed and considered comments received and determined not to pursue special designations at the Sunkhaze Meadows Unit. In early August 2012, the Service distributed a newsletter updating the public on the Service’s decision not to pursue a wilderness area designation. This newsletter was distributed to the same 452 contacts noted in the January 2012 newsletter distribution.

**Step E: Draft CCP and NEPA Document**

The Service published a Notice of Availability (NOA) in the *Federal Register* announcing the release of the draft CCP and EA for a 39-day period of public review and comment on April 23, 2013. During the comment period, the Service held two public meetings to obtain comments on the document. We received comments by regular mail, electronic mail, and at the public meetings. We distributed a newsletter summarizing the three management alternatives for the draft CCP and EA to coincide with the publication of the NOA. After the comment period, we reviewed and summarized all of the substantive comments we received, developed our responses, and published them as appendix G.

**Step F: Adopt Final Plan**

We submitted the final CCP to our Regional Director for approval in September 2013. The Regional Director determined that a Finding of No Significant Impact (FONSI) was warranted. Shortly thereafter, we announced the Regional Director’s final decision and the final CCP by publishing an NOA in the *Federal Register*. These actions complete “Step F: Prepare and Adopt a Final Plan.”

**Steps G and H: Implement, Evaluate, and Revise the Plan**

With the planning phase of the CCP process complete, “Step G: Implement Plan, Monitor and Evaluate” will begin. As part of “Step H: Review and Revise Plan,” the Service will modify or revise the final CCP, as warranted, following the procedures in Service policies 602 FW 1, 3, and 4 and the NEPA requirements. Minor revisions that meet the criteria for categorical exclusions (550 FW 3.3C) will require only an environmental action memorandum. As the Refuge Improvement Act and Service policy stipulate, the Service will review and revise the CCP at least every 15 years.

**Issues, Concerns, and Opportunities**

The Service defines an issue as “any unsettled matter requiring a management decision” (USFWS 2010). Issues can include an “initiative, opportunity, resource management problem, threat to a resource, conflict in use, or a public concern.” Issues arise from many sources, including refuge staff, other Service programs, state agencies, other Federal agencies, Tribes, other partners, neighbors, user groups, or Congress. One of the distinctions among the proposed management alternatives is how each addresses those issues.

From agency and public meetings and planning team discussions, we developed a list of issues, concerns, opportunities, and other items requiring a management decision. We placed them in two categories: key issues and issues outside the scope of this CCP.
Key issues—Key issues are those the Service has the jurisdiction and authority to resolve. The key issues, together with refuge goals, form the basis for developing the management direction we describe in chapter 4.

Issues and concerns outside the scope of this analysis—These issues do not fall within the scope of the “purpose of, and need for, action” in this CCP. These issues are discussed after the key issues below, but are not addressed further in this document.

Following is a summary of the issues that arose during the scoping process.

Key Issues
We derived the following key issues, not arranged in any particular order, from public and partner meetings and further team discussions.

Facilities, Infrastructure, and Staffing

1. At what levels does the Service plan to continue staffing and management of the refuge?

The lack of Service personnel at the refuge was raised several times by the public during scoping. Perceptions expressed during scoping were that the refuge has been abandoned or that the Service did not care about the future of the property. The long-term vision for the refuge includes staff stationed out of the Sunkhaze Meadows NWR. However, like all management decisions, the actual implementation of staffing is dependent upon budget availability. How the refuge will respond to staffing concerns is noted in the refuge administration discussion in chapter 4.

Habitat and Wildlife Management

1. How will the refuge address potential impacts of climate change on existing refuge habitats?

Climate change and its corresponding effects on species migrations or range distributions, extreme shifts in temperature and precipitation, and invasive species introductions may potentially pose dramatic threats and alterations to the habitats encompassed within the refuge. The ability to adapt or address these ever-changing concerns requires a comprehensive understanding of the refuge’s landscape context, individual habitats, species utilization, and their resilience.

Sunkhaze Meadows NWR and Carlton Pond WPA are located within the range of inland spruce–fir dominated plant communities. Many of the refuge habitats have developed under the climate conditions present over the past 8,000 years. Given the projections for shifts in mean temperature and precipitation for the region, new introductions of both native and nonnative species are possible results of climate change. Potential impacts of climate change are discussed in chapter 3, and how the refuge will respond to its implications is addressed in chapter 4.
2. **How will the refuge protect or improve its biological integrity in light of landscape-level ecological concerns such as biological connectivity with other nearby habitats?**

Fragmentation of both terrestrial and aquatic habitats can have adverse effects on many plant, fish, and wildlife species: reducing biodiversity, limiting genetic diversity, and increasing susceptibility to species invasion and other stressors. Activities such as logging, agriculture, or residential development can create a patchwork of forest, wetland, and grassland habitats. Dams, culverts, and other water control structures can fragment the available aquatic habitat in a similar manner.

The units encompassed by Sunkhaze Meadows NWR and Carlton Pond WPA are each fragmented to varying degrees. Sunkhaze Meadows Unit near Milford and Carlton Pond WPA near Unity are abutted by large acreages of private forest lands, some of which have been recently logged. As a result, while these areas still provide habitat for some species, it does represent a fragmentation of late successional forest lands. Other units, such as Sandy Stream and Benton, are surrounded by roads, residential property, and agriculture, which also result in fragmentation of the habitats available onsite.

We envision partnering with a variety of Federal, State, and non-governmental organizations to address these landscape-level concerns to the refuge. How the refuge will respond to connectivity needs is discussed in chapter 4.

3. **How will the refuge balance early successional habitat management for species like American woodcock with late successional habitat management?**

Sunkhaze Meadows NWR and Carlton Pond WPA provide important habitat for many State-listed birds and other species of conservation concern across the region. Among these are species such as the American woodcock, identified in many state, regional, and national plans as a priority species. It is listed as a species of highest conservation priority in BCR 14 (Dettmers 2006). Woodcock require an assemblage of early successional habitat including clearings for courtship (singing grounds), large openings for night roosting, shrub and sapling stands (0 to 15 years) for foraging, as well as young, second-growth hardwoods or mixed woods (15 to 30 years) for nesting, feeding, and brood-rearing (Sepik et al. 1981, Keppie and Whiting 1994).

Many of the bird species of conservation concern in the Northeastern U.S. are not entirely dependent on late-successional or old-growth forest (Hagan and Grove 1999); however, there are some at-risk species that are primarily dependent on the habitat features found in older forests. Birds of conservation concern that feed and nest within these late-successional forests at Sunkhaze Meadows Unit and elsewhere include bay-breasted warbler, Canada warbler, wood thrush, eastern wood-pewee, chestnut-sided warbler, blackburnian warbler, black-throated-blue warbler, and bald eagles. In addition, older forests have ecological processes that are mostly absent from young forests (Hagan and Whitman 2007). These species and processes require areas of long-term preservation in order to be sustained in perpetuity. This level of protection is not typically available with private lands, where changes in ownership can result in differing land use. Equally, other conservation lands managed by State, Federal, or local partners may change over time or have management goals that do not promote mature forest preservation.
Therefore, a management emphasis on late successional forest is important to sustaining the biological integrity, diversity, and environmental health of the Atlantic Northern Forest region.

Throughout this planning process, we have considered both the availability of habitat on a regional scale, while also considering our ability to successfully manage these types of habitats across refuge units and the WPA. How the refuge will balance early successional habitat management with late successional habitat management is discussed in chapter 4.

4. **What are the biological inventory and monitoring needs for the refuge and WPA and how will the Service meet them?**

Scientifically sound inventory and monitoring is important for the Service to understand what resources and species are present on refuge and WPA lands. Inventory and monitoring helps us increase our knowledge of those resources that we are striving to conserve and protect. In some cases, it can also help us evaluate how species or habitats respond to our management actions. A renewed emphasis on inventory and monitoring that helps inform on the ground management actions is an important recommendation of the recent *Conserving the Future* conference and final vision document, and the Service has recently expanded national funding for inventory and monitoring efforts.

Without dedicated staff to Sunkhaze Meadows NWR and Carlton Pond WPA, it is difficult for the Service to conduct the level of inventory and monitoring necessary to adequately inform management. We plan to work with the Service’s regional inventory and monitoring staff, as well as area partners (e.g., local universities) to accomplish our inventory and monitoring needs. How the refuge will respond to the need for inventory and monitoring is discussed in chapter 4.

5. **How will the refuge manage for deer populations?**

As described in chapter 1, Congress entrusts the Service with the conservation and protection of specific national natural resources: migratory birds and fish, federally listed threatened or endangered species, interjurisdictional fish, wetlands, certain marine mammals, and national wildlife refuges. Because of this mandate, local game species (those that typically do not migrate across state lines, such as white-tailed deer) are managed by state fish and wildlife agencies. In Maine, MDIFW defines and enforces the series of regulations and management actions to maintain the State’s deer population.

However, biological management for Federal trust species proposed within this plan will continue to provide habitat for local white-tailed deer populations. In addition, the Sunkhaze Meadows Unit contains a known deer overwintering yard that may provide important shelter during hard winter conditions. Similar deer yards located on adjacent private lands have recently been lost due to logging. As a result of the biological management proposed, we will protect this deer yard.

This concern and the relation of white-tailed deer to habitat management are discussed in chapter 4.
6. How will the refuge manage invasive, nonnative, and overabundant species?

Nonnative, invasive plant species such as phragmites (*Phragmites australis*) and purple loosestrife (*Lythrum salicaria*) threaten refuge and WPA habitats by displacing native plant and animal species, degrading natural communities, and reducing natural diversity and wildlife habitat values. They can out-compete native species by dominating light, water, and nutrient resources, and are particularly damaging when they dominate and overtake native habitats, as when phragmites dominates an entire wetland plant community.

The Sunkhaze Meadows Unit and Carlton Pond WPA are relatively free of invasive species. In these areas, prevention will be the key focus of invasive species management. In other areas, such as Benton Unit and Sandy Stream Unit, invasive species such as reed canarygrass (*Phalaris arundinacea*) have invaded wetland habitats and require active control to minimize their impacts on refuge habitats.

There are additional concerns that other invasive species such as nonnative insects, fish, and other animals should be considered and managed as well. Some climate change estimates also predict a shift of species distributions or conditions across the region that may allow introductions of additional species in the future.

How we respond to these concerns is discussed in chapter 4.

7. How will the refuge manage the smaller Benton and Sandy Stream units in light of limited staff resources?

Several comments were received pertaining to the ongoing management of two of the smaller units managed as part of Sunkhaze Meadows NWR. Benton and Sandy Stream Units are each located roughly an hour’s drive away from the Sunkhaze Meadows Unit and the Maine Coastal Islands NWR staff headquarters in Rockland, Maine. Because of limited staff time and the distance from the refuge’s current headquarters, both the Benton Unit and Sandy Stream Unit have had minimal management or monitoring by the Service.

How the refuge will respond to concerns regarding Benton and Sandy Stream units are noted in goals 3, 6, and 7 in chapter 4.

Visitor Services Management

For national wildlife refuges, providing wildlife-dependent recreation opportunities is also a priority. It creates the opportunity for many visitors to experience the lands that refuges protect and see the value behind the conservation work that the Service does. Providing public access and recreational use is an important issue addressed in this plan. The planning team received many opinions on specific actions or techniques to improve opportunities for wildlife-dependent recreation on the refuge and WPA.

Specific questions asked regarding the topic of visitor services, include:
1. What is designated Wilderness and how will this affect public use and management of refuge lands?

The Wilderness Act of 1964 established the National Wilderness Preservation System and a process for federal agencies to recommend wilderness areas to Congress. There are 75 wilderness areas on 63 units of the Refuge System in 26 states. About 90 percent of the Refuge System wilderness is in Alaska.

Wilderness, as defined by the Wilderness Act, is untrammeled (free from human control), undeveloped, and natural, offering outstanding opportunities for solitude or primitive recreation. Wilderness visitors may hunt, fish, and observe and photograph wildlife, if these activities are compatible with the refuge’s primary mission of wildlife conservation. Many other types of compatible recreational uses, such as cross-country skiing, canoeing, kayaking, and hiking may also be enjoyed in wilderness areas (USFWS 2011b).

After completing the Wilderness Review, we do not intend to recommend wilderness designation on any of the refuge units or WPA at this time. The completed Wilderness Review is included as appendix C.

2. What is the purpose of Wild and Scenic River designation, how is a Wild and Scenic River designation made, and how will this affect public use and management of refuge lands?

The Wild and Scenic Rivers Act provides a national policy and program to preserve and protect selected rivers, or segments of rivers, in their free-flowing condition in the National System. Wild and Scenic River designation seeks to protect and enhance a river’s current natural condition and provide for public use consistent with retaining those values. Designation affords certain legal protection from adverse development, e.g., no new dams may be constructed, nor federally assisted water resource development projects allowed, that are judged to have an adverse effect on designated river values.

When completing land and water planning (e.g., CCPs) on Federal lands, agencies are required to initiate a Wild and Scenic River Review. The review included in this document only applies to Service-owned lands, and only addresses our determinations of river eligibility and classifications. These determinations are tentative and are subject to further consideration during the study phase which we will complete sometime after the CCP is completed. At this time, we do not know when we might be able to complete the suitability study. We expect it will be several years.

Agencies by themselves cannot designate rivers under this act. If we determine that there are eligible and suitable segments (as defined by the act), we will prepare a separate legislative environmental impact statement and submit it with the results of the suitability study to the Director of the Service and ultimately to Congress for potential designation. This is a long process and there will be several opportunities for public involvement.
The results of our Wild and Scenic Review do not affect recreational use of Sunkhaze Stream or its tributaries, including access for boating, fishing, or hunting at current or expected levels of use. Wild and Scenic River designation, if it occurs, is not expected to affect these uses either. For more information, please see the Wild and Scenic River Review (appendix D).

3. **How will the Service address snowmobiling on refuge lands? Will the refuge remain open to snowmobiling? Will snowmobiling be expanded?**

Sunkhaze Meadows NWR currently allows snowmobiling in designated locations on several refuge units. Sunkhaze Meadows Unit contains a 3-mile segment of the Interconnected Trail System (ITS) trail along the western portion of the unit. Benton and Sandy Stream Units also contain smaller segments (1 mile or less) of local or regional snowmobile trails. These segments are maintained by local snowmobile clubs, which is authorized under a special use permit issued by refuge staff.

We intend to maintain snowmobile access similar to current levels. Specifics on how we will address snowmobiling on Service lands are noted in goals 4, 5, and 6 discussed in chapter 4.

4. **How will the refuge continue to support hunting opportunities?**

As previously mentioned, hunting is one of the priority public uses identified in the Refuge Improvement Act. We received several comments from interested members of the public both supporting and opposing hunting on refuge lands. Currently, the refuge is open to all State seasons, according to State regulations with one exception, coyote hunting. Some commenters requested we more closely align refuge regulations with State regulations, specifically by expanding the coyote hunting season and revising refuge hunter orange requirements to mirror State regulations.

As Federal lands, season dates and refuge-specific regulations apply on all refuge properties. To the extent practicable, refuges align their regulations with state regulations. Because of the Refuge System’s wildlife first mission and the need to balance hunting with other priority public uses, refuge hunting regulations are sometimes more restrictive than state regulations. Because changing the refuge and WPA hunter orange requirements was minor, we were able to modify them to be consistent with State regulations in 2012. We have discussed coyote hunting on refuge and WPA lands previously (see issue 5, Habitat and Wildlife Management). Specifics of how the refuge will address hunting are described in goals 4 through 6 in chapter 4.

5. **How will the refuge continue to support trapping opportunities?**

Trapping is not included as a priority public use under the Refuge Improvement Act. Trapping is currently allowed on refuge units and at Carlton Pond WPA as a management activity. We control this activity by issuing special use permits. We are not proposing any changes to the refuge’s current trapping program. How the refuge will address trapping is noted in chapter 4, under general refuge management.
6. What will the refuge do to improve access to the various refuge units?

Having access to the refuge by way of parking lots, trails, boardwalks, and other infrastructure is an important issue for many people who provided comments during scoping. These access points and trails are used by visitors to engage in various recreational uses, as well as by Service staff for management purposes.

Infrastructure requires regular maintenance to provide safe and open access. In recent years, some of the existing infrastructure at the Sunkhaze Meadows Unit has fallen into disrepair. Trails have become blocked or overgrown. Boardwalks have buckled as a result of frost heave. Maintenance of these access areas is important to provide continued, safe public use. Current interpretive kiosks are out of date as well.

Another concern at the Sunkhaze Meadows Unit is limited access to Sunkhaze Stream. Many visitors access the refuge via small boats. Currently, the refuge’s only access point for the stream is at the far northern end of the refuge. Boaters need to portage their boats over 1,000 feet to reach the stream and launch. Commenters requested additional access to Sunkhaze Stream, particularly at the southern end near its confluence with the Penobscot River and State Route 2.

Other refuge lands have varying degrees or types of access. Carlton Pond WPA has no trail system because of limited upland areas and the dominance of open water and emergent wetlands. However, many people enjoy paddling Carlton Pond to observe wildlife. At the Benton and Sandy Stream units, no formal trail systems exist, although each unit does contain snowmobile trails that are used for winter transportation and for occasional wildlife observation during the warmer months. Several comments were received asking the refuge to consider improving access on these units for wildlife observation and other uses.

How the refuge will respond to access concerns are noted in goals 4 through 6 in chapter 4.

7. How does the refuge plan to improve its public use programming, including environmental education and interpretation?

Environmental education and interpretation are two priority public uses outlined under the Refuge Improvement Act and are important ways of reaching out to the public. Currently, we provide a limited number of presentations upon request. In the absence of staff, the Friends of Sunkhaze Meadows provide an important role in connecting people to the Sunkhaze Meadows Unit by providing regular environmental interpretive programming on refuge lands. The Service would like to improve its support for the Friends organization and programming, as well as create additional Service-led programs, if resources are available.

Others are interested in the possibility of additional environmental education or interpretive programs at Carlton Pond WPA, Benton Unit, or Sandy Stream Unit. Providing programming at these units will require refuge staff or a partnership with local organizations to develop and lead events. How the refuge will respond to public use programming concerns are noted in goals 4 through 6 in chapter 4.
8. How does the refuge plan to address cultural and historic resources related to the refuge?

The lands and waters comprising Sunkhaze Meadows Unit have been important to the Penobscot Indian Nation for thousands of years. The refuge continues to have cultural and historic significance to the Penobscot Nation. Other Tribes such as the Passamaquoddy Tribe, Houlton Band of Maliseet Indians, and Aroostook Band of Micmacs also have historic or cultural connections to refuge units. Sunkhaze Meadows Unit is known to contain at least one archaeological site and others may exist. Preservation and interpretation of these resources is an interest to many of those who provided initial comment during scoping.

To date, no cultural or historic resources have been identified at Carlton Pond WPA or at Benton or Sandy Stream Units. Still, their locations may provide opportunities for future interpretation of Native American or early European settlement cultural history.

How the refuge will respond to cultural and historic resource concerns are noted in goals 4 through 6 in chapter 4.

9. How will the refuge utilize partnerships with area agencies, businesses, and organizations to benefit resource conservation and visitation?

The Service will not be able to accomplish all of its desired management for the refuge and WPA alone. To achieve its management goals, the Service will need to rely heavily on partnerships with Tribal, State, and local agencies, and other organizations.

Members of Tribal and State agencies have offered suggestions for ways the Service can partner on its biological management and public use goals. Local municipalities and non-governmental organizations have offered recommendations for ways partnerships can improve refuge visitation and public use offerings.

How the refuge will respond to potential partnerships is noted in goal 7 in chapter 4.

Issues and Concerns Outside the Scope of this Analysis

The following issue was raised during public meetings. It is outside the jurisdiction and authority of the Service and will not be addressed further within the CCP.

1. Can the refuge harvest natural resources from refuge lands in order to fund refuge staff positions?

Several comments were received during scoping inquiring into what opportunities might be available for resource harvesting on the refuge with the specific intention of using funds generated to support a refuge staff position. Resource harvesting is occasionally allowed in circumstances where it is deemed to be compatible with refuge goals and to fulfill wildlife habitat objectives. To date, no commercial resource harvesting has been allowed on the refuge.
According to Service policy, national wildlife refuges cannot use funds generated on the refuge for staff positions or other onsite improvements. Funds obtained from the sale or harvest of timber, peat, or other resources on a refuge are deposited into the national budget. They are then distributed as part of the Refuge Revenue Sharing Program, which distributes these funds to municipalities to offset losses in tax revenue from any tax-exempt Federal lands in their jurisdiction. Staffing levels at Sunkhaze Meadows NWR and Carlton Pond WPA are subject to approval of the Service’s Northeast Region Assistant Regional Director of the Refuge System and are based on Federal budget allocations.

2. *What is the status of the East-West Highway and how will it affect the refuge?*

We are aware of the discussions around a proposed East-West Highway. We are working to stay informed of the process, but it is not a Federal or Service activity and therefore is outside of the Refuge System’s jurisdiction.

**Plan Amendment and Revision**

Periodic review of the CCP will be required to ensure that objectives are being met and management actions are being implemented. Ongoing monitoring and evaluation will be an important part of this process.

Monitoring results or new information may indicate the need to change our strategies. At a minimum, CCPs will be fully revised every 15 years. We will modify the CCP documents and associated management activities as needed and we will follow the procedures outlined in Service policy, the Refuge Improvement Act, and NEPA requirements, and other Federal mandates.