

## Appendix J



Amanda Boyd/USFWS

*Double-crested cormorants*

# Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for the Nantucket National Wildlife Refuge

- Introduction
- Summary of Comments Received

## Introduction

In August 2011, we completed the “Nantucket National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Assessment” (draft CCP/EA). That draft refuge plan outlined three alternatives for managing the refuge over the next 15 years, and identified alternative B as the “Service-preferred alternative.”

We released the draft plan for 60 days of public review and comment from August 2 to October 1, 2011. The notice of availability of the draft CCP/EA was printed in the *Federal Register* on August 2, 2011. It indicated that there would be a 30-day comment period, which is the standard amount of time given to CCP reviews. Refuge staff knew that August was a difficult time to ensure that residents would be able to review and provide comments just prior to the Labor Day holiday, so the comment period was extended another month. We distributed a press release to local and regional newspapers on August 9, 2011 extending the comment period through October 1, 2011 and announcing that there would be two public meetings on September 15, 2011 at the Nantucket Inn. We sent a planning update via regular mail and e-mail to all the names on our mailing list, which included individuals and organizations that had attended our October 2008 scoping meetings. We also informed members of the Nantucket Anglers Club about the upcoming public meetings while at a September 8, 2011 meeting about seals held at the Nantucket Anglers Club. An article about the draft CCP/EA appeared in *The Inquirer and Mirror* on September 15, 2011. It appears that this was the first time a local newspaper provided information about the public meeting, and several comments were received in writing or at the meeting about insufficient meeting notice. We regret that there was not more timely notification in the newspaper, but we followed normal procedures for notifying the press through the issuance of a press release well before the public meeting dates, the general public through the *Federal Register* notice, and the public that had previously engaged in our planning process through the planning update.

The public meetings were held in Nantucket at the Nantucket Inn on September 15, 2011. The afternoon meeting had a total of 19 people and the evening meeting had a total of 26 people. We also received comments via e-mail or in writing separate from the public meetings. We evaluated all letters and e-mails sent to us during the comment period, along with comments recorded at our two public meetings. This document summarizes all comments received, and provides our responses to them.

Based on our analysis in the draft CCP/EA, and our evaluation of comments, we made minor modifications to alternative B, and recommended it to our Regional Director for implementation. It is that modified alternative B which is detailed in this CCP. Our modifications include additions, corrections, or clarifications of our preferred management actions. We have determined that none of these modifications warrants publishing a revised or amended draft CCP/EA before publishing the CCP.

The minor changes we made include the following:

- We provided updated information on numbers of seals, common terns, roseate terns, and habitat acreage on the refuge.
- We changed the dates for staging tern closures to mid- to late July through mid-September. This change reflects new information received during the past two summers of field observation by refuge staff.
- We provided updated information about visitor use numbers and activities.
- We removed the threshold for seal protection after consultation with the National Marine Fisheries Service.
- We provided updated socioeconomic information.

Our Regional Director selected alternative B for implementation. She also determined that a Finding of No Significant Impact (FONSI) is justified. She made the decision after:

- Reviewing all the comments received on the draft CCP/EA, and our response to those comments; and,
- Affirming that the CCP actions support the purpose and need for the CCP, the purposes for which the refuge was established, help fulfill the mission of the Refuge System, comply with all legal and policy mandates, and work best toward achieving the refuge’s vision and goals.

Concurrent with release of the approved CCP, we are publishing a notice of the availability in the *Federal Register*. That notice will complete the planning phase of the CCP process, and we can begin its implementation phase.

## **Summary of Comments Received**

The public comment period for the draft CCP/EA resulted in a total of 38 comment submissions including comments from the following organizations:

- Alliance to Protect Nantucket Sound
- County of Nantucket County Commissions
- Maria Mitchell Association
- Massachusetts Division of Fisheries and Wildlife
- Nantucket Conservation Foundation, Inc.
- Nantucket Island School of Design
- National Park Service
- The Trustees of Reservations
- Town of Nantucket Board of Selectmen

In the discussion below we address all substantive comments received. In our responses, we may refer the reader to other places in the document where we address the same comment. Directly beneath each subject heading, you will see a list of unique letter identification numbers that correspond to the person, agency, or organization that submitted the comment. The cross-reference list appears at the end of this appendix.

In several instances, we refer to specific text in the draft CCP/EA, and indicate how the CCP was changed in response to comments. Both the draft CCP/EA and final CCP are available online through a link at the refuge's Web site at: <http://www.fws.gov/northeast/nantucket/> (accessed June 2012) and the Northeast Regional CCP Web site at: <http://www.fws.gov/northeast/planning/refugeccps.html> (accessed June 2012). You may also request a CD-ROM or a print copy from refuge headquarters at:

Nantucket National Wildlife Refuge  
c/o Eastern Massachusetts NWR Complex  
73 Weir Hill Road  
Sudbury, MA 01776  
Email: [northeastplanning@fws.gov](mailto:northeastplanning@fws.gov)

## **Habitat and Species Management**

### **Current Seal Population (Letter ID# 5, 6, 26)**

*Comments:* Commenters expressed concern about the impact of seal populations on biological diversity, environmental conditions, and fish stocks. Population numbers of seals are a concern to fishermen. The Seal Abatement Coalition has gathered over 500 signatures on a petition seeking relief from the protections afforded gray seals under the Marine Mammal Protection Act.

*Response:* We do not have any information to date that suggests the number of seals using the refuge are negatively impacting biological diversity, environmental conditions, or fish stocks, but we welcome the sharing of reports or data that address these concerns. Increasing seal numbers on the refuge are not necessarily indicative of an increasing population of seals in the Northeast, as local seal haul-out sites can change seasonally and between years. In 2011, the National Oceanic and Atmospheric Administration (NOAA) began including Nantucket NWR in their aerial flights that are used to track seal numbers and distribution, and this will provide a sense of overall importance of Nantucket NWR compared to other sites in Massachusetts. We also hope to continue monitoring seal use on the refuge.

We do not have specific diet information for seals that are using Nantucket NWR as a haul-out site. Seals are generalists however, and will consume a wide variety of prey items, focusing on abundant species. We have updated chapter 3 in the final CCP to provide additional information about seal diet.

*Comment:* Local fishermen note that the policy of encouraging seals to haul-out in the protected area on the refuge has resulted in an increase in seal population, which in turn, has had a socioeconomic impact on fishing.

*Response:* The Service does not have a policy of encouraging seals to haul-out on the refuge, but it is likely that management actions taken to ensure visitor safety and comply with the Marine Mammal Protection Act have resulted in more use of the refuge by seals. The closure for seals was first initiated in 2008, primarily because of concern for visitor's safety after visitors were repeatedly seen approaching the seals at an unsafe distance. It appears that more seals are generally using this site than in past years, though there is a strong seasonality component. Numbers of seals vary within and between years, and depend on a variety of other factors beyond the presence of a closure, including the availability of forage fish and habitat availability at other traditionally used sites.

There is no information available that indicates that the number of seals on the refuge has specifically had a socioeconomic impact on Nantucket or on the fishing industry. We have not conducted any controlled visitation counts to determine precisely what the impact of the seal and bird closures are on the number of anglers and angler days on the refuge, nor do we intend to as we do not have sufficient staff resources to conduct an evaluation of this type. In general, there does not appear to be a noticeable decrease in the number of anglers on the refuge on days when the refuge is accessible to oversand vehicles. The refuge and adjoining lands on the Coskata-Coatue Peninsula provides considerable access to anglers.

*Comment:* It is essential that the Service develop a management plan that balances the needs of wildlife with the traditional use of beaches for surfcasting.

*Response:* The Service will prepare a visitor services plan as a step-down management plan for the refuge. The plan will be written to clarify visitor access and use while maintaining wildlife closure areas for haul-out, nesting, feeding, and staging areas. It is the mission of the Service to provide wildlife-dependent recreation so long as it does not conflict with the needs of wildlife or habitat protection of Federal trust species. The CCP includes a set of compatibility determinations which detail the wildlife-dependent, recreational uses authorized on the refuge, as well as nonpriority public uses. It is the Service's intent to allow for these uses to occur as much as possible. However, some restrictions in the use seasonally or spatially, as outlined in the CCP, are necessary to minimize conflict with wildlife use of the refuge during certain times of the year. The Service will install visually aesthetic signage in 2012 to inform the public of areas that are closed seasonally to encourage minimizing wildlife disturbance.

#### **Historic Seal Population (Letter ID# 33)**

*Comment:* A comment was given by one participant regarding the existing and historical population of seals. "[Nantucket] NWR must point out that seals have historically been in much greater abundance, but were effectively extirpated from this range due to slaughter for bounty."

*Response:* Gray seals were found along the northwestern Atlantic coast until the 17th century, and were considered locally extinct until the 1980s. Chapter 3 has been amended to provide more information about seal populations.

#### **Buffer Zone (Letter ID# 4, 18)**

*Comment:* Commenters stated that there has not been a premier fishing location in 8 years because of seals. The closure has increased tern and seal populations. Perception is that access is being cut off because of growing seal and tern populations. One commenter asked, "Can [the Service] just create a buffer area around the terns?"

*Response:* The Service has an affirmative responsibility to protect wildlife and comply with Federal laws on the refuge. We started closing the haul-out site at the tip of Great Point in 2008 to protect both seals and visitors. The Service must maintain a 150-foot buffer around seals to comply with the Marine Mammal Protection Act. Buffers for terns and piping plovers follow Federal and State guidelines and are adjusted during the season depending on the presence or absence of these species. We have established a buffer for staging roseate terns so that reduced disturbance from people will enable the terns to forage and increase their fat supplies, increasing the likelihood that they will safely reach their wintering grounds.

Increased wildlife use often occurs when disturbance from humans is eliminated or decreased, but depends on other factors as well such as the availability of food, shelter, and safety from predators.

### **Piping Plovers (Letter ID# 15, 33)**

*Comment:* The draft CCP/EA lists oversand vehicle (OSV) closure dates of April 1 through September 15 annually, yet plovers and other birds arrive earlier than that to scout for nesting habitat, possibly due to climate change. OSVs parked or moving through their habitat in March can interfere with their nesting choices, and possibly shunt them to less desirable sites. The Chatham Conservation Commission now routinely expands the nesting bird window to March 1 to 15. It is also likely that fall migration may run later than September 15.

*Response:* Refuge staff adhere to Federal guidelines for piping plover management and protection. In most years, we do not visit the site until late March, but suitable habitat may be closed prior to April if necessary when staffing schedules allow.

*Comment:* Removing people from beaches will increase predators. Terns and plovers have always been on the refuge, and perhaps the reason why plover populations are decreasing is because people have been removed which increases predators.

*Response:* There is much evidence that predator populations are generally increasing in the Northeast United States as a result of suburban sprawl and development. Many species that are well adapted to survive in human-dominated landscapes are the same species that often prey on nesting beach birds. Cumulative impacts of increased predator presence and increasing anthropogenic disturbance has resulted in reproductive failure of beach nesting birds throughout the Northeast, and minimizing disturbance through seasonal closures is an important step in assisting species' recovery. Predator management is another important action. We have not, nor do we propose, to restrict people from all of the beaches, but we do direct use away from sensitive nesting and staging areas during critical times of the year. On Nantucket NWR, there is no evidence that predators are increasing as a result of restricted, seasonal vehicular or pedestrian access. Rather, a review of piping plover numbers in the State of Massachusetts shows an increase in population which can be largely attributed to seasonal closures. This has been seen on Nantucket Island as well.

### **Invasive Species Management (Letter ID # 33)**

*Comment:* Herbicides should never be used on the Refuge. At this point, since multiflora rose is the only invasive found on the refuge, herbicide is unwarranted. This species should be cut down and dug out by hand, before it flowers and goes to seed.

*Response:* There are currently two non-native, invasive species documented on the Refuge, multiflora rose and sea poppy. We practice integrated pest management, so therefore we try to manually remove invasive species whenever possible on all our refuges. While we prefer not to use herbicides, sometimes there is no feasible or practicable alternative, and we will use herbicides if, and when necessary, to meet our management objectives.

### **New England Cottontail Management (Letter ID # 33)**

*Comment:* We support the reintroduction of New England cottontail as long as it has been established that they historically occurred on the island and that predator levels have been adequately addressed.

*Response:* Any decision to reintroduce New England cottontail will be made in consultation with conservation partners on Nantucket Island and with the Massachusetts Division of Fisheries and Wildlife and after communication with town of Nantucket officials.

### **Great White Sharks (Letter ID # 33)**

*Comment:* Since 2008, great white sharks have been seen following and feeding on seals near shoreline swimming areas in Chatham, Massachusetts. The refuge might want to plan for this issue, should they be seen off Great Point.

*Response:* We have noted this comment. We do not plan on closing the refuge if great white sharks are present, but will coordinate with local officials if a real safety threat to swimmers is identified. Outreach will be conducted as needed.

**Public Use and Community Relations**  
**Beach Permits and Fees (Letter ID # 10, 20)**

*Comment:* One commenter stated that beach permits are too expensive.

*Response:* We currently do not charge a fee to access Nantucket NWR, but have the authority to do so in the future. If we decide that access fees should be considered as a way to raise revenues for refuge management, we will develop a proposal that will be subject to public review and comment prior to any final decision being made. The OSV permit that is issued by The Trustees of Reservations (TTOR) is for access to the Coskata-Coatue Wildlife Refuge, which is adjacent to Nantucket NWR. Visitors wishing to arrive at the Nantucket NWR by OSV must have the permit to drive through TTOR and Nantucket Conservation Fund (NCF) property to get to the refuge. There is no fee charged for people to walk through NCF and TTOR property to the refuge or for those wishing to visit the refuge by boat.

*Comment:* When Great Point is closed for a significant length of time, locals should receive a rebate of some sort the next year for the beach sticker.

*Response:* Please see the response to the comment above. The Service does not charge a fee for access to the Nantucket NWR.

**General Comments on Restriction of Access (Letter ID # 7, 27)**

*Comment:* Restricting public access is in direct opposition to mission. Continued public access is favored.

*Response:* Providing opportunities for compatible, wildlife-dependent recreation is part of our core mission. In order for a public use to be compatible, however, it must not materially interfere with or detract from the purpose of the refuge or the National Wildlife Refuge System (Refuge System). Allowing public uses at times and in areas that creates significant disturbance to wildlife is not compatible and would violate our responsibilities. Most refuges restrict public uses, either spatially or temporally, in order to protect wildlife populations and their habitat while giving people an opportunity to engage in wildlife-dependent public uses.

*Comment:* Concern that closed access is too restrictive, bird population will increase and more areas will be unavailable to public who will go elsewhere.

*Response:* Since this is a national wildlife refuge, it is our legal requirement to protect wildlife species and their habitats. At times, this requires closure to areas that visitors may wish to enter. Bird populations are seasonal, and the number, species, and timing of bird use on the refuge is dependent upon many factors, with the availability of a disturbance-free area being just one of these factors. It is our intention, as described in the CCP, to always have some level of visitation, so that the public can experience the unique natural resources of this area while maintaining wildlife and habitat protection. If parts of the refuge are seasonally closed, there are hundreds of acres of similar habitat on TTOR and NCF property which is generally open to provide opportunities for public use.

**Fishing Access (Letter ID # 5, 6, 7, 10, 30)**

*Comment:* Several people were concerned about the preservation of Great Point as a premier place for fishing and the Service's plan to restrict that through closures and restrictions on OSVs.

*Response:* The Service fully recognizes the importance of fishing the rip at the tip of Great Point to the seasonal and permanent residents of Nantucket, in particular, and to some visitors to Nantucket. We understand that closure of the tip of Great Point is a significant disappointment to anglers who remember this as the premiere fishing spot on Great Point. However, we must maintain a 150-foot buffer around all seals in compliance with the Marine Mammal Protection Act and we must comply with State and Federal tern and plover guidelines which leads to closures. Since Nantucket NWR is so small, and the rip attracts seals as a feeding and resting site, there are inherent conflicts with balancing wildlife and habitat protection and providing public use opportunities. During the times of the year when closures are necessary to protect wildlife, the ability of anglers to fish the tip will be limited.

*Comment:* The town of Nantucket would like to be able to ensure access in perpetuity to the entire complex to maintain the island's history of fishing and shellfishing. The town of Nantucket feels strongly that having this land to provide recreational opportunities to the public is necessary for the success of any management plan or management activities for this property.

*Response:* The Service is in support of and will maintain fishing access wherever possible. However, due to the wildlife priorities of the refuge, the Service cannot ensure access to the entire area. It can ensure access whenever possible so long as disturbance to trust species is minimized. We have no plans to restrict access permanently.

#### **Vehicular Access (Letter ID # 6, 8, 10, 12, 24, 33)**

*Comment:* There were several comments regarding vehicle access and OSV use both supporting restrictions and not supporting restrictions. Some people expressed a desire for alternative means of transportation to accommodate increased populations and increased elderly and young people.

*Response:* It is the intent of the Service to allow OSV access to the lighthouse parking area year-round. However, during plover nesting season TTOR typically closes the the Galls area of their property to OSVs to protect nesting birds. Pedestrian access is authorized during this time. Alternative forms of transportation, such as boats, may need to be used to reach the refuge during these closure periods. Boat service to the refuge could be a possibility in the *future*. We are proposing to seek funding to conduct an alternative transportation study for the refuge that could provide recommendations on alternative ways for public access to the refuge.

#### **Partnerships**

##### **TTOR and Memorandum of Understanding**

#### **Support of Renewal of the MOU with TTOR (Letter ID # 17, 36)**

*Comment:* An updated memorandum of understanding (MOU) between the Service and TTOR is needed to formalize the good working partnership demonstrated over the past 10 years. Priority issues to address in this MOU include improved coordination of staffing and contingency plans for changes in staffing patterns as well as specific authority for Trustees staff to enforce Service and Endangered Species Act regulations within the Great Point Refuge.

*Response:* We value our working relationship with TTOR, and have found that there are many aspects of refuge management that can be done cooperatively with TTOR. There is considerable overlap of responsibilities and expertise, and while our missions are not identical, there are many aspects of managing refuge and TTOR lands that are similar. We are beginning the process of updating our MOU with TTOR. However, it will not include giving TTOR the authority to enforce Federal regulations, as that is not allowed by Federal law or statute.

*Comment:* TTOR commented that alternative B recommends that Service issue special use permits for certain activities and that these would be issued at the discretion of the refuge manager. We ask that the TTOR be included in this review and approval process to ensure that any such uses would not negatively impact TTOR and NCF's adjacent property or its visitors.

*Response:* We will consult as necessary with TTOR and NCF to ensure any permitted use of the refuge is not detrimental to the management of their lands.

#### **Additional Outreach (Letter ID# 14, 32, 36)**

*Comment:* Commenters expressed a desire for additional outreach to the homeowners, anglers clubs, and fishing groups to foster additional fishing opportunities and commercial fishing tours. Support was expressed with the intent of permitting commercial fishing tours and guides.

*Response:* We have noted this comment. We are cognizant of the value of additional outreach, especially around fishing, and look forward to beginning a dialogue with individuals or companies able to provide commercial fishing tours and guides.

## **Refuge Administration**

### **Support of Alternative A with continued TTOR/NCF Management (Letter ID# 13, 16, 17, 25, 30, 36)**

*Comment:* Commenters support alternative B with understanding that NCF and TTOR have been doing that management already (Letter ID# 3, 9, 35, 36)

*Response:* We have selected alternative B as our preferred management alternative as we have an affirmative responsibility to manage Federal lands. We will continue to maintain a close relationship with TTOR and develop a stronger conservation partnership with NCF. We will continue to rely on our conservation partners to help identify landscape level priorities and provide us with valuable feedback regarding management priorities for the refuge.

*Comment:* TTOR has actively managed several of its coastal properties to address proven predator threats, including feral cats at Coskata-Coatue, and would welcome Service efforts to strengthen this program. Alternative B recommends that the Service develop a separate step-down integrated pest management plan for the refuge. TTOR would be eager to work closely with refuge staff on this to determine acceptable levels of pest damage and control strategies.

*Response:* We have noted this comment. We look forward to working with TTOR on this important issue.

### **Funding for Management (Letter ID# 32)**

*Comment:* There is little need for the Service to commit to and spend the funds on personnel, equipment, supplies, and the like, as Islanders have done a remarkable job to this point.

*Response:* We are very appreciative of the assistance we have received over the years from TTOR on the refuge, and we fully appreciate the additional conservation work done by NCF, MassAudubon, Maria Mitchell Association, local land trusts, and others. We agree there is a strong conservation ethic on Nantucket Island, and we are excited to be part of this collective effort. As landowners on the island, we have an affirmative responsibility to manage our lands. We also bring a unique, national perspective to conservation and we have wildlife and habitat management expertise that some organizations may wish to tap in to. We see ourselves as value added and will not interfere with other conservation efforts where our participation is not needed or wanted. Furthermore, our ability to increase our involvement with Nantucket conservation will be a direct reflection of our fiscal and personnel resources. Nantucket NWR is one of eight refuges that are part of the Eastern Massachusetts NWR Complex, so our conservation work on Nantucket NWR is prioritized within the refuge complex as well. With that being said, it is our intention that over the course of the next 15 years, we will have the resources necessary that will result in a more active presence on Nantucket Island.

## **Visitor Services**

### **Alternatives for Visitor Services (Letter ID# 1)**

*Comment:* One commenter is in support of visitor services portion of the plan which would create opportunities in town and to teach.

*Response:* We have noted this comment.

### **Signage, Kiosks, Outreach Center (Letter ID# 2, 17, 33)**

*Comment:* Commenters had concern over signage at the refuge and felt that additional signs not needed (excluding flags and banners). Some also felt that any signage on the refuge should be direct; for example, signs that say "Keep off dune."

*Response:* The refuge is in need of some additional signage and a kiosk in order to properly relay its wildlife messages to visitors in the absence of year-round onsite staffing. We acknowledge the importance of aesthetically pleasing signage that blend in with the natural landscape. Some of the signs that we have or will be erecting must meet standardized signage requirements established by the Service. We will do everything we can to minimize the number and location of signs and make them as tasteful as possible, recognizing that we need to convey certain information to visitors to ensure public safety and the protection of wildlife.

**Request to Update Signage as Alternative to Developing a Separate Kiosk (Letter ID # 36)**

*Comment:* To be effective, the Service, TTOR, and NCF will need to work cooperatively to develop a unified education program. For example, as an alternative to developing a separate Service kiosk at the gate house, it would make sense to update the current signage to give visitors one clear message as they enter this jointly managed landscape.

*Response:* We work collaboratively to educate the public about all partnerships missions and intend to install a kiosk with refuge specific information by the lighthouse.

**Support of an On-Site Facility (Letter ID # 36)**

*Comment:* While we are grateful for the utility of the contact station that the NCF's land enables at the Wauwinet Gate House, our collective ability to engage and educate the public would certainly increase with an onsite facility. The Wauwinet Gate House footprint is effectively maxed out.

*Response:* The development of a partnership building which can engage and educate the public is also of considerable interest to the Service. Such a facility is a long-term project which will require a significant amount of time and effort by all the conservation partners.

**Climate Change and Sustainability (Letter ID #11, 33, 36)**

*Comment:* Climate change and sustainability should be a targeted theme in the full suite of education and communication strategies with visitors to the refuge.

*Response:* We have noted this comment.

**Trail Systems (Letter ID # 36)**

*Comment:* We caution against the establishment of new trails. Trail decisions should be looked at in the full context of the entire landscape. Together with TTOR and NCF land, the existing trail system offers ample and diverse opportunities for visitors to use and enjoy this place. More trails would increase the impact on the property's natural communities as well as the costs in managing these trails and their use.

*Response:* Please refer to map which delineates where the "proposed" trail would be. It is already a well-defined foot path. By making this an official trail, we would close down the other unofficial trails with the intention of minimizing further degradation of the dune habitat. We also intend to install a matted type of base which can be covered by sand in order to address future erosion issues.

**Staffing**

**Additional Staffing (Letter ID # 25)**

*Comment:* I would love to see you provide a biologist for the reservation as you put forward in your plan and I appreciate the need for a law enforcement person who can be available on the reservation.

*Response:* We have noted this comment. Please also see our proposed staffing chart in appendix E of the final CCP.

**Land Acquisition/Protection**

**Lack of Support for Land Acquisition (Letter ID # 5, 6, 32)**

*Comment:* Commenters indicated a lack of support for additional land acquisition.

*Response:* We have noted this comment. Comments on this issue varied significantly. Many commenters do not believe the Service should acquire additional lands, some believe that this is not the best time for additional acquisition, and others support additional land acquisition. The Service is developing a national strategy for the strategic growth of the Refuge System, and only acquires land that is of national significance to wildlife management. Additionally, land acquisition as a climate change adaptation tool is growing increasingly important and relevant. Please refer to Appendix G, "Land Protection Plan," in the final CCP to learn more about the importance of additional land acquisition to help achieve national conservation goals.

**Support for Land Acquisition (Letter ID # 3, 24, 33, 36)**

*Comment:* We welcome Services' proposed role in protecting this landscape more broadly, especially through the negotiation and acquisition of a conservation easement over the entirety of the Trustees property. Such a conservation easement must provide for a balanced approach to stewardship of the Trustees' property that encourages public use and enjoyment of this stunning natural place.

*Response:* We have noted this comment.

*Comment:* In addition to our support for a Service-held conservation restriction on the TTOR's Coskata-Coatue property, we recommend that you consider the 40-acre Bigelow Point on Tuckernuck Island in the proposed land conservation program. This ecologically significant site provides high quality habitat for short-eared owls as well as shorebirds and may be threatened by residential development in the future as a term restriction on the property has lapsed.

*Response:* The Service has finalized a land protection plan that identifies land acquisition priorities that focus on federally listed threatened, endangered, and candidate species. The Bigelow Point tract is not part of the land protection plan for Nantucket NWR. The Service is undertaking a separate initiative which is evaluating the importance of coastal islands from the Massachusetts/New Hampshire border to Long Island Sound. We will pass information on about Bigelow Point to the staff working on that project.

*Comment:* The draft CCP/EA's recommendation to expand the Nantucket NWR's boundary could provide an opportunity to have discussions with conservation partners that would result in enhanced management cooperation or additional land protection. The uncommon, and sometimes globally rare natural resources which occur on Nantucket do not respect artificial, man-made property lines and it may be that there are benefits to be gained in safeguarding these rarities through yet to be identified collaborations.

*Response:* We have noted this comment. We welcome additional discussions with conservation partners and stakeholders.

**Light House Stewardship (Letter ID # 36)**

*Comment:* Since March 2000, TTOR has enjoyed a positive, cooperative management agreement with the U.S. Coast Guard, and has managed and cared for the Nantucket Lighthouse (not including the light itself) on behalf of the U.S. Coast Guard. Should the U.S. Coast Guard decide to surplus this property, TTOR supports its transfer to the Service with the understanding that the TTOR will continue its maintenance of the structure. Transfer of the lighthouse to the Service would contribute to more closely integrated, collaborative stewardship of the refuge as a whole.

*Response:* We have noted this comment.

**Socioeconomic Impact (Letter ID #4, 5, 11)**

*Comment:* The fisherman are leaving and taking their money elsewhere.

*Response:* While it does appear that some local fishermen are either no longer fishing on the refuge or are not fishing there as frequently as they had in the past, there is still considerable amount of fishing occurring on the refuge when it is accessible by vehicle. Additionally, there are now people coming to the refuge to see seals and there are local captains who have started running seal tours. While the primary reason some people might come to the refuge is undoubtedly changing somewhat, all visitors contribute to the Island and its businesses in some manner.

*Comment:* The socioeconomic ramifications of the virtual closing of Great Point, Nantucket's most prominent natural feature are far reaching. The Service needs to seriously understand and measure this impact on the principle industry of this small island. There is growing evidence that traditional visitors are turning away from Nantucket both because of the blocked access to Great Point and the depletion of fish stocks, likely due at least in part to seal overpopulation. One commenter asked, "Has anyone looked at socioeconomic impacts in last 2 to 3 years with beach closures and closure of point?"

*Response:* We have updated chapter 3 in the final CCP to provide additional information about visitor use in the past few years, as well as to include socioeconomic information from a study that was conducted in 2000, which was before the refuge was managed as proactively for wildlife as it is today. All visitors to the refuge provide some economic benefit to some local businesses, although who is benefitting from this business may have changed in the last 10 to 12 years. The refuge is still very popular for fishing, and wildlife observation appears to be increasing. It is true that the number of OSV issued in the past few years has been declining. It would be very difficult to develop a site-specific, rigorous economic study that could tease through the multitude of factors that influence use of the refuge, including those that are outside the control of the Service, in order to determine the nature and extent of any economic impact on the Nantucket community as a result of the restricted vehicular access on the refuge and the closure, specifically, of the point to fishing.

## **NEPA and Process**

### **Additional Outreach Needed for Better Attendance (Letter ID #4, 5)**

*Comment:* Commenters requested additional outreach for public meetings.

*Response:* The news release was dated August 5, 2011, and was sent out to the following newspapers on August 9, 2011 via e-mail:

- Cape Cod Chronicle
- Nantucket Inquirer and Mirror
- Martha's Vineyard Gazette
- Martha's Vineyard Times
- Community Newspapers
- Provincetown Banner

Below is a list of e-mail addresses for newspaper and media contacts that received notifications to the public:

- *abrennan@capecodonline.com*
- *concord@cnc.com*
- *dleggett@cnc.com*
- *editor@provincetownbanner.com*
- *info@ccmnh.org*
- *jbasile@cnc.com*
- *kbrosnan@plumtv.com*
- *mgoodwin@cnc.com*
- *nelson@mvtimes.com*
- *news@capecodbroadcasting.com*
- *news@capecodonline.com*
- *news@mvgazette.com*
- *psa@capecodbroadcasting.com*
- *sudbury@cnc.com*
- *tduenas@cape.com*
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The number of people attending the public meetings was consistent with what we often get at our public meetings and we believe we heard the full array of comments from the attendees in both sessions as well as those who submitted comments in writing. We know there are more people who share these concerns than were present.

**Cape Wind and National Environmental Policy Act (Letter ID #34)**

*Comment:* The CCP needs to take into account the impacts of the Cape Wind Project on the Nantucket NWR.

The CCP also incorrectly states that there is insufficient information to consider. The CCP is not satisfying National Environmental Policy Act (NEPA) compliance requirements if it fails to address this important issue. There are data to consider, and the CCP must take this information into account. The Alliance requests that the CCP be revised before final action is taken to fully consider the impact of the proposed Cape Wind project.

*Response:* We stand by our position Cape Wind Project is outside the scope and jurisdiction of this plan. The Service has provided official correspondence to the State and U.S. Army Corps of Engineers, and the Secretary of the Interior has approved the project.

**Alternative B and Funding (Letter ID # 26, 29)**

*Comment:* Commenters stated that alternative B would increase funding, staff, and increased financial burden.

There should be a cost-benefit analysis.

*Response:* The Service will not be conducting a cost-benefit analysis for our selected management option. Most of the land acquisitions will be at no cost to the government. It is true that more involvement with the management of Nantucket NWR will entail an increase in operational costs. However, many of our proposed activities will cost little to implement, and some may be eligible for funding support from conservation partners or other governmental agencies. An increase of staff by one and one-half position over the next 15 years is a modest increase. The cost of managing these lands over time will be cost effective once permanent staff who live on Nantucket Island can be hired. We will not implement new actions if we do not have sufficient funding to conduct the activities in an efficient and effective manner.

**Letter ID Numbers and Respondents**

Letter Number	Name	Organization/Affiliation
1	Janet Schulte	Maria Mitchell Association
2	Curtis Barnes	
3	James Lentowski	Nantucket Conservation Foundation, Inc.
4	Ken Kassan	
5	Peter Krogh	Seal Abatement Coalition
6	Guy Snowden	Seal Abatement Coalition
7	Bob DeCosta	Town of Nantucket Selectman, Nantucket Anglers Club
8	Bill Cooper	Nantucket Anglers Club
9	Stephen Nicolle	The Trustees of Reservations
10	Jody Paterson	
11	Peter Brace	
12	Edith Ray	
13	Diane Lang	The Trustees of Reservations
14	Meghan Blair-Valero	
15	Daniel Cassano	Nantucket Masons
16	Bob Lang	

*Summary of Comments Received*

<b>Letter Number</b>	<b>Name</b>	<b>Organization/Affiliation</b>
17	Kristina Jelleme	Nantucket Anglers Club
18	Peter Kaizer	Charter Fishing Boat Captain
19	Kathy Kelm	Nantucket Island School of Design Arts
20	Mark Manchester	Nantucket Inn
21	Haynes Currie	National Park Service
22	Bill Kuppert	
23	Pamela Lohman	Nantucket Civic League
24	Patricia Pastuszak	
25	Kathy Butterworth	
26	Robert Grass	
27	Jeremy Slavitz	Nantucket Anglers Club
28	Amy Coman-Hoenig	Massachusetts Division of Fisheries and Wildlife
29	Patricia Stolte	
30	Rick Atherton	Town of Nantucket, Board of Selectmen
31	Charlotte Maison Kastner	
32	Karen Werner	
33	Billie Bates	Cape Cod & Islands Group Sierra Club
34	Audra Parker	Save our Sound-Alliance to Protect Nantucket Sound
35	Robert Inglis	
36	Lisa Vernegaard	The Trustees of Reservations
37	Edward Bell	Massachusetts Historical Commission
38	USA Citizen 1	