

Appendix C



Bill Byrne

Northern red-bellied cooter

Summary of Public Comments on Draft LPP/EA and the Service's Responses to Them

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- Summary of Comments Received
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Introduction

In January 2016, the U.S. Fish and Wildlife Service (USFWS, Service, we, our) released for public review the draft Land Protection Plan and Environmental Assessment (draft LPP/EA) for the proposed Great Thicket National Wildlife Refuge (Great Thicket NWR, refuge). The draft LPP/EA outlined two alternatives for managing the refuge. Alternative B was identified as the “Service-preferred alternative.”

We initially released the draft LPP/EA for 45 days of public review and comment from January 19 to March 4, 2016. In response to several requests, we subsequently extended the public comment period through April 3, 2016. In total, the comment period was 75 days in length.

During the comment period, we held information sessions upon request. Two were held in Maine, three in New Hampshire, two in Massachusetts, two in New York, one in Connecticut, and six in Rhode Island. Audiences included sportsmen’s groups, land trusts, and town and county officials. All six congressional delegations were contacted initially via email, and follow-up phone calls or in-person visits occurred with most district staff offices. We evaluated all the letters and e-mails sent to us during the comment period. This document summarizes all of the substantive comments we received and provides our responses to them.

Our modifications include additions, corrections, clarifications, and changes to the Service-preferred alternative. We have also determined that none of those modifications results in a significant change to our proposal to warrant a revised or amended draft before publishing the final LPP/EA.

Summary of Comments Received

After the comment period ended, we compiled all of the comments we received, including all letters, e-mails, telephone calls, and comments submitted at information sessions. In total, we received 6,064 separate written responses (some letters had multiple signatures), and 5 telephone calls. Of the 6,064 written comments, 5,523 were a form letter (cited in this appendix as comment ID #6078. We also received one petition signed by approximately 2,455 individuals (Petition A, cited in this appendix as comment ID #467).

We received a variety of letters from local, State, and Federal Governmental agencies, including the following:

Congressman Chris Gibson (NY-19)	New Hampshire State Representative, Linda Gould
Connecticut Bureau of Natural Resources	New York State Historic Preservation Office (SHPO)
Connecticut State Representative, Aundre Bumgardner	Rhode Island Historical Preservation & Heritage Commission (RIHPHC)
Conservation Committee, Stoneridge Retirement Committee	Sharon Conservation Commission
Division of Fish, Wildlife and Marine Resources, New York State Department of Environmental Conservation	Town of Charlestown, Rhode Island: Planning Commission
Dover Union Free School District	Town of Charlestown, Rhode Island: Town Administrator
Dutchess County New York	Town of Falmouth, Massachusetts: Conservation Commission
Groton Open Space Association	Town of Groton, Connecticut: Open Space Committee
Hopkinton Land Trust	Town of Harwich, Massachusetts: Conservation Department
Southern Rhode Island Small Farmers Association, Southern Rhode Island Conservation District	Town of Hopkinton, Rhode Island: Conservation Commission
Maine Department of Inland Fisheries and Wildlife	Town of Ledyard, Connecticut
Maine Historic Preservation Commission	Town of Litchfield, Connecticut: Conservation Commission
Maine Natural Areas Program	Town of Londonderry, New Hampshire
Mashpee Town Planner, Chairman of Mashpee Water District Commission	Town of North East, New York
Massachusetts Department of Conservation and Recreation	Town of Madbury, New Hampshire: Conservation Commission
Massachusetts Department of Fish and Game	Town of Plymouth, Massachusetts: Open Space Committee
Massachusetts Division of Fisheries and Wildlife	Town of Weekapaug, Rhode Island: Fire District
Natural Resources Conservation Service, New York	
New Hampshire Fish and Game Department	

We also received comments signed by representatives from the following organizations:

Amenia Conservation Advisory Commission	Massachusetts Butterfly Club
Appalachian Trail Conservancy	Massachusetts Sportsmen's Council
Association to Preserve Cape Cod	National Parks Conservation Association
Audubon Society, Connecticut	New England Antiquities Research Association
Audubon Society, Massachusetts	New England Outdoor Writers Association (NEOWA)
Audubon Society, New York	New Hampshire Timberland Owners Association
Avalonia Land Conservancy	New York State Ornithological Association, Inc.
Backcountry Hunters and Anglers	North Stonington Citizens Land Alliance, Inc.
Barnstable County League of Sportsman's Clubs	North Stonington Garden Club
Bay State Trail Riders Association	North Stonington, Connecticut: Conservation Commission
Brittany Capital Group, Inc.	Nutmeg State Council of Sportsmen
Brookline Bird Club	Nuttall Ornithological Club
Cape Cod Commission	Oblong Land Conservancy
Carver Sportsmen's Club, Inc.	Plymouth Area League of Women Voters
Connecticut Ornithological Association	Ralph T. Waterman Bird Club, Inc.
Connecticut State Parks Trails & Greenways Program	Reforest the Tropics
Connecticut Chapter of Delta Waterfowl	Rhode Island Land Trusts
Defenders of Wildlife	Richmond Rural Preservation Land Trust
Dutchess County Environmental Management Council	Ruffed Grouse Society; American Woodcock Society
Dutchess/Putnam Appalachian Trail Management Committee	Salt Ponds Coalition
Friends of the Great Swamp (FROGS)	Society for the Protection of New Hampshire Forests
Friends of the Watrous Farm LLC	Southeastern Massachusetts Pine Barrens Alliance
Green Futures of Fall River	The Compact of Cape Cod Conservation Trusts, Inc.
Greenway Land Trust of South Eastern Connecticut, Inc.	The Friends of Rachel Carson NWR
Housatonic Environmental Action League, Inc. (HEAL)	The Nature Conservancy
Housatonic Valley Association	The Six Ponds Improvement Association
Hudsonia Ltd.	The World Peace Sanctuary
Land Trust Alliance	Thornton Burgess Society
Maine Natural Areas Program (MNAP)	Tidemarth Farms
Marine Biological Laboratory	Westerly Land Trust
	Western Connecticut Council of Governments
	WGBH Radio; WCAI Radio
	Wildlife Management Institute

In the discussion below, we address and respond to the substantive comments we received. Generally, a substantive comment meets at least one of the following criteria:

- It challenges the accuracy of information presented.
- It challenges the adequacy, methodology, or assumptions of our analysis and supporting rationale.
- It presents new information relevant to the analysis.
- It presents reasonable alternatives, including mitigation, other than those presented in the document.

In order to facilitate our responses, we grouped similar comments together and organized them by subject heading. Directly beneath each subject heading, you will also see a list of unique letter ID numbers. Table 1 at the end of this appendix relates each letter ID number to the name of the individual, agency, or organization that submitted the comment.

In several instances, we refer to specific text in the document and indicate how the final LPP/EA was changed in response to comments. The full versions of both the draft LPP/EA and the final LPP/EA are available online at: <http://www.fws.gov/northeast/refuges/planning/lpp/greatthicketLPP.html>.

Service Responses to Comments by Subject

General

General Support for “the Plan” and Stated Refuge Goals

(Letter ID # 3, 4, 5, 6, 7, 9, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 42, 43, 44, 45, 46, 47, 48, 50, 52, 53, 54, 57, 58, 59, 60, 63, 64, 66, 67, 68, 69, 70, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 85, 86, 88, 89, 90, 91, 94, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 110, 111, 114, 115, 116, 117, 118, 119, 120, 121, 127, 128, 129, 130, 131, 132, 133, 138, 140, 141, 142, 143, 144, 145, 147, 148, 149, 151, 154, 155, 157, 158, 159, 160, 161, 164, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 177, 178, 179, 180, 181, 182, 183, 184, 186, 187, 188, 189, 190, 191, 192, 193, 195, 196, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 216, 217, 218, 219, 220, 221, 223, 224, 225, 226, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 249, 250, 251, 252, 253, 255, 256, 257, 258, 259, 260, 261, 263, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 292, 293, 294, 297, 298, 299, 300, 301, 302, 303, 304, 305, 307, 308, 309, 310, 311, 312, 315, 316, 317, 318, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 332, 333, 334, 335, 336, 337, 338, 339, 340, 344, 345, 346, 347, 348, 350, 352, 353, 354, 357, 358, 359, 361, 362, 363, 364, 365, 367, 370, 371, 373, 374, 375, 377, 379, 380, 381, 382, 383, 385, 386, 388, 389, 390, 391, 393, 394, 395, 396, 397, 398, 400, 401, 402, 403, 404, 405, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 424, 429, 430, 431, 432, 433, 434, 435, 437, 439, 441, 442, 443, 444, 446, 447, 448, 449, 450, 454, 455, 456, 457, 463, 464, 466, 467, 468, 469, 471, 472, 474, 480, 481, 482, 483, 485, 486, 488, 489, 490, 491, 492, 495, 498, 499, 500, 502, 505, 507, 521, 525, 526, 528, 529, 531, 535, 536, 540, 542, 543, 546, 6078)

Comment: The majority of comments received were in support of Great Thicket NWR. Several commenters specifically stated, “I wholeheartedly support the proposed wildlife refuge” and provided “enthusiastic support of the U.S. Fish and Wildlife Service’s Great Thicket NWR initiative.” Several commenters also noted various reasons for their support for the refuge which included reasons such as, “I think it would be a great boost to the native flora and fauna as well as putting some money into the local economy” and “I think expanding the shrublands and young forests in New England is a great idea.” In addition, while comments were received from various locations throughout the study area, several commenters noted support for Great Thicket NWR in conjunction with a specific location (see section titled “**Specific Focus Areas**” below).

Also, a form letter initiated by National Audubon Society, Inc., was submitted by 5,523 individuals. The letter stated, “We stand with Audubon and strongly support the critical proposal by the U.S. Fish and Wildlife Service to establish the new Great Thicket NWR.” The reasons for this support are summarized as follows:

- Populations of shrubland birds have correspondingly declined at alarming rates in recent decades and the new refuge would be a key step for protecting priority bird species.
- Additional permanently protected and managed land is needed to restore wildlife populations and return balance to Northeast woodlands.
- The USFWS would work with willing landowners within the selected land acquisition focal areas to obtain permanent protection of property either through acquisition or conservation easements.
- The proposal would direct funding and assistance to private landowners who would like to improve habitats on their lands.
- The Northeast has limited opportunities for the public to access Federal lands for wildlife-associated recreation, and the new refuge would help to address this need.

One letter (Petition A) was signed by 2,455 individuals from the Defenders of Wildlife in support of the project. This letter stated, “As residents of New England who care deeply about wildlife, we are writing to express our support for the Great Thicket National Wildlife Refuge to protect important habitats that are in decline across southern New England and eastern New York. Great Thicket NWR would also provide Northeasterners with new wildlife viewing and recreation opportunities and would aid our local economy by attracting birdwatchers and other visitors to our region.”

Response: We thank these commenters for their support for the proposed Great Thicket NWR. We have the shared goal of conserving and managing shrubland and young forest habitat for declining wildlife species and providing wildlife-dependent recreational opportunities. We look forward to working with the public and partners as we implement the final plan.

Please also see our responses to comments on specific Refuge Acquisition Focus Areas (RAFAs, focus areas) below under the section titled, “**Specific Focus Areas.**”

General Dislike of Federal Government and USFWS

(Letter ID# 56, 227, 262, 366, 460)

Comment: Several commenters stated that they did not support the Service or the Federal Government. For example, commenters wrote “it is unconstitutional that the federal government own any land” and that, “intrusion of federal directives and control is of greater concern.”

Response: The National Wildlife Refuge System (Refuge System) mission is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans. We believe the work we do to help conserve native fish, wildlife, and habitats and to offer wildlife-dependent recreational opportunities benefits the American public. There are many statutory authorities under which the Service can establish a national wildlife refuge, including the Refuge Recreation Act of 1962, as amended (16 U.S.C. 460) and the National Wildlife Refuge Administration Act of 1966 (16 U.S.C. 668dd). As stated in chapter 1 of the draft and final LPP/EA, under “Purpose of this Proposal,” we propose that Great Thicket NWR be established under the Endangered Species Act of 1973, as amended (16 U.S.C. 1534), and the Fish and Wildlife Act of 1956, as amended (16 U.S.C. 742a-742j).

With regard to the comment about “...federal directives and control is a greater concern,” we direct readers to our commitment in the LPP/EA that the Service would only acquire land from willing sellers. Lands within the acquisition boundary do not become part of the refuge unless their owners willingly sell or donate them to the Service. The proposed refuge boundary has no impact on private property use or who an owner can choose to sell to. There are no additional regulations or control on private lands not acquired by the Service. The individual landowner retains all the rights, privileges, and responsibilities of private land ownership. Please see appendix B in the draft and final LPP/EA for frequently asked questions about the Service’s land acquisition process.

Name of Proposed Great Thicket NWR

(Letter ID# 136, 369)

Comment: Two commenters felt that the name “Great Thicket NWR” is too similar to “Big Thicket National Preserve” located in Texas. These commenters requested that the name be changed for the proposed refuge.

Response: With nearly a 1,000 different National Park Service units and national wildlife refuges, many have similar names. Although we agree this can cause confusion, we have decided not to change the name of the proposed Great Thicket NWR because it is the name we used during the public comment period and in all of our public meetings and outreach materials. If we changed the name in the final document, it may be confusing to our partners and the public. We hope that because the Big Thicket National Preserve is located far from the proposed Great Thicket NWR, confusion and misunderstandings would be minimal.

Minor (factual) corrections to plan

(Letter ID #192, 156, 369, 407)

Comment: Several minor factual errors were noted which include the following:

- On pages 2.9 and 4.21 the Massachusetts Department of Conservation and Recreation (MDCR), Myles Standish State Forest, is misspelled and incorrectly referred to as a Massachusetts Division of Fisheries and Wildlife (MDFW) property.
- The Acronym Appendix is not complete; please update to include all acronyms in the document.
- Suggest adding the Trust for Public Lands (2013) publication, “The Return on Investment in Parks and Open Space in Massachusetts” to the property value analysis on page 4-12 and in the bibliography.
- The use of “Northern Housatonic” in the USFWS name for the RAFA proposed for portions of Sharon, Connecticut, and Dover, Amenia, and a sliver of North East, New York, is inappropriate and confusing. The northern Housatonic River watershed is in Berkshire County, Massachusetts. This RAFA contains portions of a sub-basin of the Housatonic known as the Ten Mile River watershed, in a geographic area locally known as the Harlem Valley. The name Northern Housatonic has no local resonance and should be replaced by Harlem Valley.
- In several tables summarizing habitat types within RAFAs, we recognized we either left out a habitat type, or miscalculated the acreage. Corrections have been made in the final tables.

Response: We appreciate the comments on the name “Northern Housatonic” but we decided not to change the name. The name for that RAFA was derived from the large, landscape-scale New England Cottontail (NEC) Focus areas in the vicinity of the border between eastern New York and western Connecticut. Many of these NEC Focus Areas have the name “Housatonic” in them and we included that title in our focus area in an attempt to maintain a connection with the NEC Focus Areas. For more information about the NEC Focus Areas, go to <http://newenglandcottontail.org/content/focus-areas-guide-cottontail-comeback>.

We also appreciate the recommendation and source for the Trust for Public Lands study. We read it but we decided not to include it in the final LPP/EA because it does not change the analysis we had in the draft document. The other suggested changes were made in the final document and we apologize for any confusion in the draft document.

Comment: One commenter felt that, “... the term ‘[Refuge] Acquisition Focus Area’ may be perceived in some affected communities, and by some landowners, as more aggressive than the USFWS intends. While recognizing that the USFWS does intend to work with willing landowners to acquire conservation interest within these areas over time, we recommend that ‘Acquisition’ be dropped from the focus area title and map labels altogether.”

Response: We chose the term “Refuge Acquisition Focus Area” or RAFA, in order to draw a clear distinction between our focus areas and the NEC Focus Areas (see reference above). We acknowledge that this term can be confusing since we are only proposing to acquire a small amount of habitat in each RAFA. However, we deliberated the pros and cons of this and other names extensively throughout the draft LPP/EA process and came to the conclusion that RAFAs is the most appropriate name. In addition, we believe that changing the name at this point in the process would only add confusion. Although we do not plan to change the name, we now have a new level of awareness of how this name can be perceived by others and we appreciate it being brought to our attention.

Technical Difficulties Accessing Files or Information

(Letter ID #1, 8, 12, 41, 77, 114, 146, 479, 501, 502)

Comment: Several commenters requested map data (Geographic Information Systems (GIS) shapefiles) or hard copies of various documents related to the LPP/EA. Several commenters also noted that they could not access the draft LPP/EA via the website. In addition, several commenters noted difficulty accessing the maps online, with several requesting the USFWS provide hard copies of maps.

Response: We apologize that several people had difficulty accessing the draft plan and maps online. We followed up with all of the commenters who had issues accessing the plan and ensured they were able to obtain a copy to review.

Add to Mailing List

(Letter ID #254, 291, 344, 416, 444, 536, 539)

Comment: Several commenters requested that they be added to our mailing list to be apprised of news and general updates related to the proposed wildlife refuge.

Response: We thank these commenters for their interest in the project and we have added them to our mailing list.

Beyond Scope of Proposal

(Letter ID #62, 203, 254, 307, 378, 426, 427, 484, 6078)

Comment: Several other requests or comments that were beyond the scope of this plan include the following:

- Requests that the Service acquire a specific property in Plymouth, Massachusetts in order to prevent a proposed solar facility.
- Requests that pets be generally controlled to reduce impacts on nesting birds.
- Concerns with perceived chemicals from airplanes and impacts on birds.
- A request that Ohio be included in the proposed refuge.
- Concerns about two proposed State bills (No. 234 and No. 235) in Connecticut for a new State Police Training Facility in the towns of Voluntown, Griswold, or Canterbury. Commenters felt that several of the proposed sites appear to be within close proximity to Great Thicket NWR and that the proposed facility could impact the proposed refuge.
- Concerns with the loss of pollinators, pesticide use, and associated impacts to blueberry and cranberry crops.

Response: Although we appreciate commenter's concerns about potential negative impacts to wildlife and habitats, these comments fall outside the scope of our proposal for creating Great Thicket NWR. For a detailed explanation of the purpose for our proposal, and its scope and geographic area of interest, please see the "Purpose of this Proposal" section in chapter 1 of the draft and final LPP/EA.

Comment: One commenter noted, "The presence of salt-marsh sharp-tailed sparrows was the principal criterion used for the selection of 14 salt marsh complexes in Rhode Island as Global Important Bird Areas by the National Audubon Society, and all of these areas face an unknown future due to the predicted increase in sea level associated with climate change. A significant amount of salt marsh habitat is predicted to be lost (inundated) in the coming decades which will precipitate a steep decline in the numbers of breeding salt-marsh sharp-tails. These losses can be ameliorated by insuring that uplands adjacent to existing salt marshes remain undeveloped in order to provide opportunity areas for salt marsh migration as sea level rises. I respectfully submit that the acquisition and protection of these uplands should be a greater priority for the USFWS refuge program in Rhode Island than the creation of the proposed Great Thicket refuge."

Response: While we agree that there is a conservation need for saltmarsh sparrows, that need is outside the scope of this proposal. Our proposal is focused on the need, identified by a six-state partnership consisting of government and non-government agencies, to stem the loss of shrubland habitat and species in strategic locations across the Northeast landscape and to restore the mosaic of habitats that these wildlife require. The Service is engaged in other efforts to assist with saltmarsh sparrow conservation, outside of this proposal. For more information on these conservation efforts, visit <http://www.tidalmarshbirds.org/>.

National Environmental Policy Act (NEPA) Concerns

Purpose for LPP

(Letter ID # 51, 134, 264, 264, 349, 6078)

Comment: Several commenters noted that they did not agree with the purpose of the project. The following specific reasons were given:

- (a) Regarding the following statement on page 1-2 of the draft LPP/EA, “All six states have identified shrublands and young forest habitat as high priorities for conservation,” the commenter states, “While this statement is true, it should be clearly understood that shrublands and shrubland-dependent species are not the only priorities recognized in State Wildlife Action Plans. The principal argument for creating the new refuge is the need for increased land management for a single species, the NEC. The proposal attempts to strengthen its rationale by choosing focus areas that contain unrelated species of concern, most notably several federally listed species, the commonality being a cursory preference for loosely defined shrubland, or thicket habitats.”
- (b) “A particularly annoying issue cited throughout the proposal, and in other supporting documents (e.g., state Wildlife Action Plans) is the contention that a basic ecological process, natural succession, is a threat to some species of wildlife. To support this contention the draft LPP/EA cites evidence for the decline of early successional species, but the presentation has the flavor of a political stump speech, laden with hyperbole, enigmatic phrases, and unsubstantiated conclusions that have been carefully chosen to muster public support for a dubious proposal.”
- (c) “The LPP/EA does not provide a compelling argument that more federal land ownership is actually necessary to achieve wildlife habitat improvement benefits for the 10 proposed acquisition areas described very generally in Chapter 2, pages 2-9 to 2-11. This will not significantly improve the potential for greater land and resource protection than already exists among the many federal and state agencies that are already striving for (and succeeding at) increased protections through conservation easements. Furthermore, the LPP/EA fails to advance a compelling argument why increased public land ownership (amounting to 15,000 acres, or 0.02 percent of the total New England/New York land base) and the corresponding increase in operating costs, federal restrictions, and regulations is needed to accomplish these goals.”
- (d) “There is no need for this project based on the habitat that is maintained by existing powerline corridors.”

Response:

- (a) The Service, States, and other non-governmental organizations work to conserve and manage a variety of habitats for a wide-range of species. We are in general agreement that shrubland species are not the only priority habitat and species in the Northeast needing conservation action. However, the purpose of this proposal was focused specifically on shrubland-dependent species because of the rarity of shrubland habitat in the Northeast, the decline of many shrubland-dependent wildlife species, and the consensus among the States and Service that shrubland habitats and wildlife should be a priority for conservation and active management. We feel that our proposal would benefit a wide range of shrubland-dependent species. The NEC is only one of the species we considered when developing this proposal. We also considered American woodcock, eastern hognose snake, a variety of migratory birds, rare plants, and seven federally listed species: American burying beetle, bog turtle, Indiana bat, Northern long-eared bat, Karner blue butterfly, Northeastern bulrush, and the Massachusetts population of the northern red-bellied cooter (cooter).
- (b) We did not intend to characterize natural succession as a threat. While it is true that many areas that once provided shrubland habitat have naturally transitioned to more mature forest, the threat is not the natural process. Rather, the threats are the overall loss of native habitat to development and changes in land use that reduce the natural disturbances needed to create early successional habitat. We describe this in detail under “Threats to Resources” in chapter 1 of the draft and final LPP/EA.

Numerous studies, the six State fish and wildlife agencies, and many conservation organizations agree that this habitat type and associated species are declining and in need of conservation attention.

- (c) We believe our proposal would complement and build upon the existing State and Federal programs aimed at conserving and managing shrubland and young forest. We agree that these existing programs are successfully protecting these habitats, but feel that our proposal is another important, necessary tool to help achieve population goals for shrubland-dependent wildlife species. Indeed, all our partners agree additional land protection and active management is needed in order to accomplish stated goals for shrubland habitat and shrubland-dependent species, as evidenced in the NEC Conservation Strategy, (<http://newenglandcottontail.org/>). We believe the benefits of additional Federal land protection and management would far outweigh any of the costs, especially since we propose to acquire half of the 15,000 acres in conservation easements and half in fee title.
- (d) While powerline corridors can provide important habitats for many shrubland-dependent species, they do not provide enough habitat across the Northeast to support populations of declining shrubland species. Our proposal is intended to complement the work of others and increase the amount of shrubland habitat available regionally for these species.

Comment: Two commenters questioned the logic of creating a new refuge instead of adding to existing refuges. Specifically, it was noted that a large portion of the targeted acquisition goals could be satisfied by extending the acquisition boundaries of existing national wildlife refuges including Ninigret, Trustom Pond, and John H. Chafee NWRs.

Response: We did consider an alternative that would only add on to existing refuges, but determined that proposal would not adequately address the needs of shrubland-dependent species throughout the Northeast. In particular, that proposal would have excluded many high priority habitat areas in New Hampshire, New York, and Connecticut and would not include several NEC Focus Areas. Any new lands acquired would be overseen and managed by the nearest existing refuge and staff. We explain in more detail why we eliminated the decision to expand existing refuges under “Alternatives or Actions Considered but Eliminated from Detailed Study” in chapter 2 of the draft and final LPP/EA.

Adequacy of Public Involvement

(Letter ID# 62, 146, 254, 291, 313, 319, 349, 376, 472)

Comment: Several commenters requested a 45 to 90 day extension to the comment period in order to provide additional time to read the draft LPP/EA and to provide comments.

Response: Based on these comments, we extended the public comment period to April 3, 2016, for a total of 75 days. We received thousands of comments on the plan and feel that this extension gave the public and our partners adequate time to review and provide substantive comments on the draft LPP/EA.

Comment: Several commenters felt there was inadequate local public, affected landowner, and local town official engagement throughout the planning process. In their opinion, there was little effort to gather input from the public and local municipalities prior to the release of the draft LPP/EA. Specifically, they wished that there had been local participation in the development of the focus areas.

Additionally, several of these commenters requested a public forum, documentation be made available for public viewing, and that residents affected should be notified. Given the sensitivity of many communities to increased Federal ownership and control, they felt this was a significant shortcoming in the EA. Several others requested that the draft LPP/EA be advertised in local newspapers to provide local communities the opportunity to comment. One individual requested that summer residents within RAFAs be notified since they might not have any knowledge of this proposal.

Response: We regret that some people feel there was not enough engagement at the local level. However, in our experience with these types of proposals, we usually receive little interest from the public to engage in the process until we have a proposal to present. After releasing the draft LPP/EA to the public, we made every attempt to engage the local communities to gather input on our proposal. On the day that we released the draft LPP/EA for public review, we contacted town officials in every affected town within our focus areas—about 40 in all—to notify them of the public release and to offer to talk or meet with each of them upon request.

The initial plan was released for a 45-day comment period but was extended another 30 days in response to public request. During the 75-day public comment period, we held information sessions upon request. Two were held in Maine, three in New Hampshire, two in Massachusetts, two in New York, one in Connecticut, and six in Rhode Island. Audiences included sportsmen’s groups, land trusts, and town and county officials. In addition, we distributed press release to media outlets throughout the six-State affected area. These press releases generated over 30 newspaper articles as well as several radio interviews and on-line stories. We feel that the level of outreach was appropriate and that local communities had adequate opportunities to provide comments on our proposal.

Dismissal of Two Alternatives Without Sufficient Explanation

(Letter ID# 349)

Comment: One commenter noted that the draft LPP/EA considers in detail only two alternatives: (1) No Action, and (2) the establishment of Great Thicket NWR. The commenter goes on to note that the draft LPP/EA, “summarily dismisses two alternatives that rely more heavily or entirely on conservation easements to achieve the same goals” and “the draft LPP/EA states that they would not meet the purpose and need, but it does not clarify why that is true.” In addition it was noted that there is evidence that conservation easements and cooperation with other Federal and State partners in achieving habitat improvement goals has been very effective. The example provided states that, “The Natural Resources Conservation Service (NRCS) has been extremely effective in applying Environmental Quality Incentives Program (EQIP) funding toward projects that provide New England cottontail habitat.”

Response: We agree that conservation easements are an excellent and highly effective tool for conserving and managing wildlife habitat, including creating and maintaining shrubland and young forest habitat. However, we believe that in order to meet one of our stated purposes in chapter 1—to achieve habitat and population goals identified in the NEC Conservation Strategy—we must have the flexibility to respond to landowners’ needs. While selling or donating a conservation easements may be the right fit for some landowners, others may prefer to donate or sell the fee simple interest in their land. As stated in chapter 2 of the draft LPP/EA, “Proposing an alternative that only allows us to acquire easements could limit us from acquiring important shrubland habitat...As such, under alternative B, the Service would acquire whichever interest in land is needed to accomplish its management objectives, and whichever interest the landowner is willing to sell.” In addition, while some habitat goals have been achieved through easements and partnership cooperation, the six-state collaboration of government and non-government partners stated in the NEC Conservation Strategy that there is a need for additional secured (i.e., protected) acreage and management capability to meet population and habitat goals. Our proposal addresses that stated need.

Adequacy of Biological Impact Analyses

(Letter ID #62, 137, 254, 264, 302, 308, 349, 369, 379, 392, 409, 460, 525)

Comment: One commenter felt that the gray catbird is too common to be identified as a benefiting species in the proposal, stating “If the gray catbird is to be used as an indicator of the condition of shrub thicket habitat in Rhode Island, then there is clearly no need to create more of this habitat type.”

Response: Under the section “Wildlife-Birds” in chapter 3 of the draft and final LPP/EA, we list gray catbirds as a “moderate priority species” that is dependent on scrub-shrub and early successional habitats for breeding within Bird Conservation Region (BCR) 30. Gray catbirds use a wide variety of habitats, but are often found in low, dense shrubby areas. We would not be specifically managing for gray catbirds or using them as an indicator of habitat quality, but they would benefit from our proposal. In addition to benefiting declining species, our proposed management would help keep common species common as well.

Comment: One commenter was concerned that the bird population status information we used was flawed. The commenter felt that many of the bird species we stated were declining are in fact widespread and increasing in numbers. In particular, the commenter disagreed with the methodology of the Singing Ground Survey for American Woodcock and Breeding Bird Survey (BBS) data for blue-winged warblers, prairie warblers, Eastern towhees, and whip-poor-wills. This commenter also stated that the State Wildlife Action Plans used the same flawed data to determine Species of Greatest Conservation Need and that we should not rely on that data either.

Response: The shrubland associated birds of conservation concern mentioned in the draft and final LPP/EA are identified in part through population trends as assessed by the BBS, as well as other vulnerability factors including population size, range size, and known threats. While the BBS has limitations and deficiencies, such as road-side bias and a spatial sampling design that limits inferences at smaller scales, it is the only long-term bird monitoring program specifically designed to track population trends of commonly breeding birds at large spatial scales across the U.S. and southern Canada. We believe the BBS provides the best available, although imperfect, information for assessing bird population trends at the regional scale, which is the context we refer to in the LPP/EA. Other sources of information, such as state-level breeding bird atlas efforts, contribute to our knowledge of the status of bird populations but they were not designed to track population trends at regional scales and have other limitations such as variation in observer effort and sampling intensity between atlas iterations.

Comment: One person felt that we set population goals at the wrong scale. The commenter writes, “the LPP/EA proposal uses habitat objectives derived for a much broader region - Bird Conservation [Region] 30 which includes portions of the states of New Jersey, Delaware, Maryland, and Virginia. Because the proposed Great Thicket refuge is exclusively within the area covered by PIF 9 (southern New England) then the objectives cited in that plan should be utilized.”

Response: As a Federal agency with a national perspective, it is the Service’s policy to develop landscape protection plans that will contribute to population goals at the BCR level. We feel that our proposal would also contribute to the small Partners in Flight (PIF) regional population goals as well. In addition, PIF is no longer updating its physiographic area plans, including the Southern New England (Physiographic Area 9) plan. That plan has not been updated since 2003, and the bird population and habitat objectives in that plan are outdated. Bird population and habitat objectives at the BCR scale are the most current objectives available for use in comparing with the anticipated outcomes of the actions proposed in the draft and final LPP/EA.

Comment: One commenter suggested that we use the Northeastern Terrestrial Wildlife Habitat Classification (NETWHC) (Gawler 2008) as the basis for discussing habitats in the proposal. This person also expressed concern that our estimate of the amount of shrubland in the proposed Rhode Island focus area was not accurate. The commenter writes, “The [draft LPP/EA] reports in Table 19 (page 3-41) that the current acreage of shrubland in the Rhode Island focus area is 2,513 acres, but this estimate is not accurate because of the broadly applied cover type classification used for this analysis. For example, shrub swamp is included in the “freshwater marsh” cover type and therefore is not included in the shrubland total. An analysis conducted by the RI GIS Program using the Ecological Community Classification has determined that the acreage of shrubland habitat in the RI Focus area is actually 4,388 acres, a discrepancy of 1,875 acres.”

Response: The broad habitat types used in the proposal are based on ecological systems products developed by the University of Massachusetts Designing Sustainable Landscapes (DSL) project. This classification is, in fact, based upon The Northeastern Terrestrial Wildlife Habitat Classification System produced by The Nature Conservancy, and available through NatureServe. For more information on the DSL project and the data layers they used to develop their habitat types, please visit: <http://www.umass.edu/landeco/research/dsl/dsl.html>. Only slight modifications were made to the system for the purposes of the DSL project. The habitat type headings used in descriptions in the text, and in all land cover type tables, are essentially the categories listed at the less detailed “Formation” level in both of those systems. We condensed or collapsed the numerous, more detailed vegetation classes down to this more general, less-detailed level for use across our large focus areas and the larger landscape. The land cover type tables in chapter 3 of the draft and final LPP/EA display our summaries of the formations within each focus area.

In reviewing this comment, we agree that some corrections were needed to a table published in the draft plan for the Rhode Island East-West RAFA (re: table 19). We recognized we missed including some of the open water acreage, we added a habitat type (Estuarine Intertidal), and adjusted acreages within the remaining habitat types to better reflect our habitat descriptions. We appreciate the detailed review of our tables and then pointing out the inaccuracies.

Comment: One commenter felt that we did not have enough support for our assertion that shrubland habitats are declining. The commenter writes, “... it is disconcerting to see that the primary piece of evidence used to support this contention is the following statement on page 1-9: ‘In eastern North America over the last 60 years, open habitats (grasslands, savanna, barrens, and shrublands) have declined by 98 percent, with shrubland communities comprising 24 percent of this decline (Tefft 2006)’. A review of Tefft (2006) finds no corroborating citations to support the statement, and a cursory search of the literature also finds no verification of the percentages given.”

Response: The Service and the six State fish and wildlife agencies involved in this plan are in consensus that shrubland habitats and wildlife habitats have been declining and should be priorities for conservation. Numerous studies have shown that shrubland habitat has declined precipitously in the last 50 to 60 years. We cite several other studies under “Threats to Resources” in chapter 1 of the draft and final LPP/EA. Additional citations are available in the six State’s Wildlife Action Plans.

Comment: Several people were concerned about the tradeoffs between managing for shrubland species versus species that prefer other habitats. One commenter asked, “... why a shrubland would be better than another type of habitat preserve... Why is a thicket more valuable than a forest?” Another writes, “The...plan leaves... the perception that some species are being picked to value over others and then one is led to ask who is doing this selection and what is the evidence that suggests that these 35 species are worth prioritizing over species that exist in other habitats?”

Response: There are many different species of conservation concern with different habitat needs. Habitat management always has tradeoffs. The purpose of this plan is to help address the needs of certain declining shrubland-dependent species. All six state fish and wildlife agencies covered by this proposal have identified shrubland habitat as a priority and declining regionally. While species that require mature forest are also valuable, there is currently much more of that habitat available in New England and New York.

As we identify lands for acquisition and shrubland management, our top priority is to conserve areas where shrubland habitat already exists and is either naturally persistent or can be actively managed (see “Refuge Acquisition Focus Areas” in the chapter 2 for our list of acquisition criteria). We recognize the importance of forest connectivity, and are not proposing large-scale conversion of high quality, contiguous forest blocks into smaller, fragmented blocks. In some cases, we may harvest trees in forested areas to help improve shrubland connectivity. In these areas, we would aim to mimic natural forest disturbances to create a mosaic of early successional, shrubland, young forest, and mature forested habitats. For many

species of forested wildlife species, the patches of shrubland and other early successional habitat near more mature forest are important foraging sites and cover (e.g., black bears forage on berries, moose forage on shoots of shrubs and young trees, small mammals and birds forage on insects, etc.).

Comment: One commenter asked that we do not automatically try to remove all nonnative plants from proposed refuge lands, writing, “It is my understanding that multiflora rose has important habitat functions for NEC. Some of the most hated “invasive” nonnative plants, such as common reed and purple loosestrife, also have important habitat functions for certain uncommon or vulnerable native species (including bog turtle, marsh birds, giant silk moths, and rare dodders)...Invasive plants can be controlled or contained where their spread is specifically undesirable, and left alone or reduced in biomass where they are harmless or beneficial to species of concern (or where they provide other valuable ecosystem services).”

Response: In general, native plant species provide higher-quality habitat for native wildlife species. Under “Invasive Shrub Species and Methods for Control” in appendix A of the draft and final LPP/EA, we state, “Many... invasive species (e.g., autumn olive, multiflora rose, Japanese barberry, buckthorn, and bush honeysuckle) contribute to the density of understory cover, but often spread at the expense of native species that may provide a better source of food. When undertaking management work, we consider it important to avoid any actions that may promote the spread of invasive species, and proactive monitoring and management are recommended to prevent exotic species from dominating a particular site. However, removing all invasive plants at once may be detrimental to the cottontail and other wildlife populations. A plan for sequential removal of exotic plants over a period of years may be warranted.”

Comment: One commenter requested that we include benchmarks for evaluating success, asking, “What is the expected density of the targeted species at a particular point in time? If the anticipated densities do not occur what are the follow up steps?”

Response: Should the Service acquire land for the proposed Great Thicket NWR, we would develop habitat management plans that would include specific goals, objectives and strategies for target habitats and species. We would coordinate with the North Atlantic Landscape Cooperative and other partners to help determine which habitats and species to manage for, as discussed in the section in chapter 1 entitled, “Relationship to Service Policies and Landscape-level Conservation Goals” in the draft and final LPP/EA.

Comment: One person was concerned that our proposed management would fragment forest blocks and increase edge effects. He stated that, “The consequences of these actions should be addressed in the proposal.”

Response: As we identify lands for acquisition and shrubland management, our top priority is to conserve areas where shrubland habitat already exists and is either naturally persistent or can be actively managed (see “Refuge Acquisition Focus Areas” in chapter 2 for our list of acquisition criteria). As explained earlier, we are not proposing large-scale conversion of high quality, contiguous forest blocks into smaller fragmented blocks. Although we may harvest trees in some forested areas, we would aim to mimic natural forest disturbances to create a mosaic of early successional, shrubland, young forest, and mature forested habitats. For many forest interior wildlife species, patches of shrubland and other early successional habitat located near mature forest offers important foraging sites and cover. We believe no further analysis is needed.

Comment: One commenter writes, “To protect soil stability and fertility request that the USFWS does not remove biomass (chips) from the site when transitioning from forest cover to shrublands. Some of these parcels are likely to undergo repeated cycles of harvesting in short rotations. If the biomass is removed each time there will be a steady decline in soil productivity as the bulk of the nutrients are concentrated in smaller branches and tips.”

Response: In appendix A in the draft and final LPP/EA, we generally describe how we would manage refuge lands that we acquire. As we acquire lands, we would develop more detailed, site-specific management treatments. During all management, we would follow best management practices (BMP), to ensure we are creating the highest quality wildlife habitat. These treatments, and the amount of biomass we remove, would vary by the type of vegetation we are managing and by the targeted wildlife species. Overall, we expect that in most cases we would leave some amount of chips, brush piles, and other biomass.

Comment: One commenter writes, “Why there is little or no mention of the virtual disappearance of the Chinese ringneck pheasant which at one time flourished on Aquidneck Island?”

Response: We did not mention ring-necked pheasants because they are a non-native game species. In the Northeast, pheasants seldom reproduce in the wild and farm-raised pheasants are often stocked to provide recreational hunting opportunities. The Service and Refuge System are focused on conserving native species and there is no stocking of non-native game bird species on refuge lands.

Comment: One individual noted that the section of the draft plan in chapter covering cultural resources and historic preservation is ahistorical and cites the following excerpt as an example: “European contact (e.g., explorers and traders) with native people began during the 16th century in New England. Foster and Motzkin (2003) suggested that European arrival prompted such rapid and profound changes to the lifestyle and land use practices of indigenous people that by the time colonists began to settle here, the landscape was already altered. Foster and Motzkin (2003) suggested that expansive clearing for agriculture and semi-permanent (rather than mobile) villages were a new phenomenon and resulted from European influence.” In addition, “the cultural resources section of the draft LPP/EA should be corrected to remove the notion that Native societies in this region only transitioned to ‘expansive clearing for agriculture’ after the arrival of Europeans” and noted “the converse is true.”

Response: While we stand by the notion that European arrival likely accelerated changes in lifestyle and land use, we agree that indigenous people were likely clearing land for agriculture long before people came over from Europe. Therefore, we have removed that statement in the final LPP/EA in chapter 3.

Comment: Regarding the analysis of public use, two commenters noted that general recreational impacts should be given more consideration throughout the draft LPP/EA. One commenter specifically asked how the analysis accounts for impacts from recreation beyond hunting and fishing as noted on page 4-1 of the draft LPP/EA.

Response: Throughout chapter 4 in the draft and final plan, we generally discuss the potential impacts from public use on future refuge lands. Since we are proposing to potentially acquire lands across a wide area, we did not include site-specific analysis. However, should lands be acquired for the refuge, we would conduct this type of detailed analysis before allowing public uses or constructing any public use facilities, including trails.

Prior to allowing any use on a national wildlife refuge, a refuge manager must complete a compatibility determination. While developing the compatibility determination, the refuge manager would use current scientific studies and professional judgement to ensure the use does not adversely impact refuge resources and that it contributes to the refuge’s purposes and Service mission. We describe this process under “Public Use” in chapter 2 of the draft and final LPP/EA. Activities such as off-road vehicles and mountain biking are generally not allowed on refuges due to their impacts on soils, hydrology, and wildlife.

For larger projects, additional NEPA analysis may be necessary. We would also develop Visitor Services Plans, Hunt Plans, and Fishing Management Plans, which would include NEPA analysis and public review and comment.

Comment: A few comments were received regarding socioeconomic analysis of the draft LPP/EA. One commenter noted that impacts to agriculture within the focus areas are not addressed stating that, “Agricultural areas and old fields are one of the targeted land types for management.”

Response: We do not intend to target prime agriculture lands for refuge acquisition. Instead, our priority would be to connect individual landowners with agricultural organizations and State and other Federal agencies to protect these lands as part of an integrated, working landscape. We support enrolling these lands into Federal and State agricultural conservation programs that focus on protecting working lands while also promoting economically viable practices that benefit wildlife, protect water quality, and provide other ecosystem services. Occasionally, we may acquire agricultural lands from willing sellers when other programs are not available to keep the land in production and when there is a threat that the land will be converted to other uses. In these situations, we may acquire these lands to prevent development, ensure protection of important wildlife habitat, and support public recreation access.

Comment: Another commenter specifically requested that an economic impact analysis of the proposal be conducted for the County of Dutchess New York in order to determine impacts on taxes and future development. Furthermore it was stated that, “There is little discussion of the short-term and long-term trade-offs and potential adverse effects to things like local communities, public use and access, further increases in federal spending, federal largesse, and further regulation of local activities. Without this discussion of adverse impacts as well as benefits, how can one conclude, as required in NEPA, that this proposal will not ‘significantly affect the quality of the human environment’?”

Response: In chapter 4 of the draft and final LPP/EA, we analyze the socioeconomic impacts of our proposal, including the tradeoffs between the potential loss of property tax revenue, refuge revenue sharing payments, and the benefits of open space and conserved lands. However, as stated in chapter 4, while there may be some upfront reductions in local tax revenues, reduced dependence on municipal services could more than counter these losses. In addition, open space often increases neighboring property values and provides public goods, such as recreational opportunities, aesthetic beauty, and water quality protection. Other unknowns, such as relocation and spending decisions, and property enhancement effects, will ultimately determine the extent of the economic and fiscal impacts within the region. While these relationships are identified and discussed in our document, estimating these impacts quantitatively requires a large degree of speculation and is beyond the scope of our analysis.

Our proposal would not create any additional Federal regulations on private, local, or State lands. There would be no restriction of activities on lands not acquired. Also, the Service would only acquire lands from willing sellers.

Laws, Policies, Mandates

Consistency with State Laws and Statutes

(Letter ID# 125, 545)

Comment: One comment was received related to general consistency with State laws and statutes. Specifically, MDFW requests that “In the event the Great Thicket NWR is established in Massachusetts that the full range of state-listed species and their habitats located on such federal land are subject to the same protection and habitat management approach provided for by MDFW under the Massachusetts Endangered Species Act (MESA).”

Response: While our main priority on refuge lands are Federal trust resources (migratory birds and waterfowl, interjurisdictional fish, and federally threatened and endangered species), we believe that our management for these species also benefits and helps conserve State-listed species and their habitats. In particular, this proposal would benefit rare and State-listed species that rely upon shrubland, young forest, and early successional forests. As specific parcels for the proposed Great Thicket NWR are

acquired, we would continue to coordinate with MDFW on how we can benefit State-listed species. For example, we would consult with MDFW staff when developing habitat management plans for acquired parcels.

Comment: One commenter referenced a New Hampshire state statute, stating that “The Federal government is not allowed to own more than 2 percent of the total land area within the state of New Hampshire excepting the White Mountain National Forest and 5 percent of a town’s tax base for its land holdings, Revised Statutes Annotated (RSA) 121:6”

Response: In acquiring land for the refuge, we would comply with all applicable laws and regulations.

Federal Land Ownership – General

Land Acquisition Process

(Letter ID# 156, 346, 366, 369, 379, 496)

Comment: A few comments and questions were received regarding the overall acquisition process. One commenter noted that “In order to deepen support for the Great Thicket NWR among as broad a group of stakeholders as possible, the agency should explicitly state in the draft LPP/EA that it will not use eminent domain to protect any new lands.” Another commenter noted that the use of temporary lease or management agreements should be avoided noting that, “lease agreements might expire after decades resulting in future affected landowner’s refusal to renew or revise the agreement.” One commenter specifically requested that land not be acquired and then sold to wealthy individuals or non-profit organizations.

Response: While the Service has the authority to use eminent domain, our long-standing policy, as evidenced by our record, is to work with willing sellers only. For more information about the Service’s land acquisition process, see appendix B of the draft and final LPP/EA.

Although we understand concerns about management agreements and leases not being permanent, we believe that they can still be beneficial. We can use short-term management agreements and leases to protect or manage habitat until more secure land protection strategies can be negotiated or until funding for more permanent protection becomes available. Management agreements and leases can also be used by landowners who are unable or uninterested in selling fee title or a conservation easement on their land. For more information on our proposal to enter into management agreements and leases, please see the section “Option 3: Easements, Leases, and/or Management Agreements” in chapter 2 of the draft and final LPP/EA.

The Service permanently acquires land to benefit Federal trust resources; it does not sell land to individuals or non-profit organizations.

Comment: MADCR noted that there does not appear to be a process by which MDCR or other state conservation agencies/land trusts are notified as to when potential parcels are identified for the refuge. MDCR recommends that a process be developed to prevent miscommunication with the public, and to ensure that Federal acquisition does not adversely affect operational or other state agency needs and objectives.

Response: The Service would continue to work with States and other conservation partners to identify and prioritize appropriate parcels for refuge acquisition. To this end, we anticipate developing land protection partnerships in each of the refuge focus areas so partners can meet periodically to discuss land acquisition priorities and strategies. Such partnerships exist at many of our other national wildlife refuges, including Mashpee NWR, and they are very successful.

Comment: One commenter asked what the proposed monitoring scenario for lands acquired by the Federal government under a conservation easement would entail, noting that this is not addressed in the draft LPP/EA.

Response: Refuge managers generally inspect and monitor conservation easements annually or at least every 3 years to ensure compliance with the easement language. For each conservation easement, there will be a baseline report that describes the conditions at the time the refuge acquired the easement. The refuge will determine the type and frequency of monitoring needed to effectively ensure compliance based on the specific easement language, habitat needs, and the baseline report. The Service's policy (601 FW 6) on monitoring conservation easements is available online at: <http://www.fws.gov/policy/601fw6.html#monitoring>.

Comment: One commenter had several questions related to the process of acquiring specific parcels:

- Will there be a parcel-based analysis to identify priority acquisition areas when there is an opportunity from a willing seller?
- Does the USFWS have, or plan to create, a process or checklist for determining whether a particular parcel fits within the target plan (e.g., parcel prioritization or ranking criteria)?
- Will the USFWS engage state and local partners in either the criteria development or parcel review – proactively or as “opportunities” for conservation/management arise?
- Will the Service pursue both upland and wetland opportunities for habitat management equally?
- Would the Service consider purchasing and restoring degraded wetland habitat for Great Thicket NWR?

Response: We list the criteria we would use to evaluate and guide acquisition decisions under “Refuge Acquisition Focus Areas” in chapter 2 of the draft and final LPP/EA. We developed these criteria with partners and included them in the draft LPP/EA to allow others to comment on them. As opportunities to acquire parcels from willing sellers occur over time, we would use these criteria to prioritize acquiring habitat that best contributes to our wildlife population and habitat goals. We do not have a specific preference for upland versus wetland habitats, and we would consider acquiring and restoring degraded habitat on a case-by-case basis. We would still use the criteria mentioned above to evaluate potential degraded lands. Our decision would also be based on the type and extent of the degradation, the feasibility of restoration, and what resources are available to help restore the land.

We would work with non-profit organizations, local and State agencies, and private landowners to identify suitable parcels for refuge acquisition. To this end, we anticipate developing land protection partnerships in each of the refuge focus areas so partners can meet periodically to discuss land acquisition priorities and strategies. Such partnerships currently exist at many of our other national wildlife refuges and they are very successful.

Comment: One commenter inquired about how the Service would find properties to acquire: “... is your plan to just look through the real estate listings and offer to buy what you want or will you be soliciting people to make a real estate sale or donation to you?... what constitutes a willing seller?...what would prevent you from buying every house that comes up on the market within a neighborhood and forcing everyone else to move in order to rewild the area?...and will you be purchasing small (acre or under) parcels with a single family homes on it and if so would you raze the house?”

Response: The Service only works with interested, willing sellers. Lands within an approved refuge acquisition boundary do not become part of the refuge unless their owners are interested in selling or donating them to the Service, there is an agreement in price, and funding is available. Under “Refuge Acquisition Focus Areas” in chapter 2 of the draft and final LPP/EA, we list the criteria we would use to

evaluate and guide acquisition decisions on a parcel-by-parcel basis. In general, small lots with houses do not provide high-quality habitat. However, in some cases, we may acquire small lots with buildings from willing sellers if we can combine them with other parcels into larger management units or if they would create an important linkage between other parcels. Generally, the Service is not interested in maintaining buildings, unless there is a need for office space, storage, or housing. Appendix B: Frequently Asked Questions in the draft and final LPP/EA addresses many of these concerns and provides additional information on the Service's land acquisition process.

Implications for Non-federal Ownership Within Refuge Acquisition Focus Areas

(Letter ID# 295, 319, 366, 384, 458)

Comment: One commenter asked how Federal land acquisition would affect his/her property: "If you purchased property abutting mine, what would keep you from trumping up a charge of 'adulterated air and water' to make my land worthless so you could acquire it at a bargain?"

Response: None of the RAFAs have any impact on property use or who an owner can choose to sell to. These focus areas simply represent areas of interest for Service acquisition. Whether a private individual owns land within an approved refuge acquisition boundary or adjacent to refuge lands, that individual retains all the rights, privileges, and responsibilities of private land ownership. No one is under any obligation to sell or donate land to the Service.

If a landowner is interested in selling to the Service, we would appraise the property for its fair-market value. We are required by law to offer fair-market value to landowners. A landowner is under no obligation to accept the Service's offer for any reason.

In regard to the comment on contaminated air and water, all landowners are required to comply with applicable environmental laws regardless of whether or not their land is adjacent to a refuge. We would not impose any additional regulations on adjacent landowners. Rather, we would only be concerned about any violations of environmental laws impacting refuge resources. In the rare case of contamination concerns, we would work with the adjacent landowner to address these issues through the proper channels.

Comment: A few commenters asked how Great Thicket NWR would affect existing public uses at State managed properties. Specifically, these commenters noted that state properties are used for hunting, camping, hiking, fishing, and horseback riding, along with other public uses and would like assurances that these uses would remain on State managed properties.

Response: The proposed refuge would have no impact on State-managed properties. As described in appendix B of the draft and final LPP/EA, landowners (including State and local governments) with property within the acquisition boundary retain all their landowner rights, privileges, and responsibilities. States would continue to make their own management decisions about their lands, including what types of public uses to allow and what type of habitat management to employ.

Comment: One commenter noted a concern that their property may be located within the proposed "approved but not acquired" focus area. The commenter requested more detailed maps for Mashpee RAFA, and if not available, specifically requested that the Service contact them to determine how their property would be affected by the proposed Great Thicket NWR.

Response: We apologize for any confusion and we responded directly to this landowner. On the Mashpee RAFA map, the areas outlined in green are within the existing approved refuge boundary for Mashpee NWR. If those lands were acquired by the Service, they would become part of the Mashpee NWR.

For lands in either the Mashpee NWR or Great Thicket NWR approved boundaries, it is the Service's policy to only acquire land from interested, willing sellers. Lands within the acquisition boundaries do not become part of the refuge unless their owners are interested in selling or donating them to the Service; the boundary has no impact on property use or who an owner can choose to sell to. Landowners would still be able to manage their lands as they wish and still retain all the rights, privileges, and responsibilities of private land ownership. There are no additional regulations placed on these lands.

Land Management

(Letter ID# 478, 505)

Comment: A couple of commenters asked how Great Thicket NWR refuge properties would be managed and how it would affect private forested lands.

Response: Appendix A: Conceptual Management Plan, in the draft and final LPP/EA, explains how we plan to manage any future refuge lands to provide habitat. The appendix is organized by habitat type. For each habitat, we describe the type of management we would conduct (e.g., prescribed burning, mowing, etc.)

The refuge would not affect private forested lands. Landowners would still be able to manage their lands as they wish. As described in appendix B of the draft and final LPP/EA, landowners with property within the acquisition boundary retain all the rights, privileges, and responsibilities of private land ownership.

Funding Sources

(Letter ID# 120, 153, 248, 287, 349, 352, 369, 407, 415, 470, 484, 493, 535)

Comment: Several commenters had questions related to the overall funding for Great Thicket NWR which include: Will any new Federal funding be available for the refuge? How is the available funding different than what has been used at Mashpee NWR? Will this refuge actually receive funding?

Several commenters noted that Federal agencies such as the Natural Resources Conservation Service (NRCS), Forest Service (FS), and the USFWS, as well as several State wildlife, forestry, and agricultural agencies in New England, have authority to acquire conservation easements under various programs such as Forest Legacy (FS), the Agricultural Conservation Easement Program (NRCS), the Healthy Forests Reserve Program (NRCS), the Conservation Stewardship Program (CSP), Environmental Quality Incentives Program (EQIP) and other conservation easement authorities within the USFWS. The commenters noted that "Opportunities for new conservation easements identified under these programs every year exceed the funding provided and that increased funding to all of these programs could have significant positive benefits to the Great Thicket NWR for significantly less cost than acquisition."

Response: We discuss funding in chapter 2 of the draft and final LPP/EA. At this time, the two main sources of funding for acquisition for the Refuge System are the Land and Water Conservation Fund (LWCF) and Migratory Bird Conservation Fund (MBCF). However, there are other grant opportunities and we often work with partners who also help secure funding for land acquisition projects. Also, we anticipate that it will take many decades to fully acquire lands for the proposed refuge. In that time, additional funding sources may become available.

We agree that there are many other great Federal programs, such as Forest Legacy and EQIP. We hope that our proposed acquisition at Great Thicket NWR would complement the work of these other agencies. Also, we agree that conservation easements are another cost-effective conservation tool that we would use to acquire lands for the proposed refuge.

Comment: One commenter asked if there was a backup funding source if the LWCF is not renewed.

Response: As mentioned above, the two main funding sources for refuge acquisitions are the LWCF and MBCF. If LWCF is not renewed, we would rely on the MBCF, other grant programs, and working with partners to identify alternative funding sources. Since this is a long-term plan, new Federal funding sources may become available as well.

Comment: Several commenters asked if there were funding sources available to pursue habitat restoration on private property noting general support for partnerships for stewardship via funding and technical assistance. The Massachusetts Audubon Society also commented on this topic stating, “We strongly encourage the USFWS to provide additional habitat management funding, resources and technical assistance for activities such as mowing, forest management, prescribed fire, and invasive control available to other conservation land managers in the area to encourage and facilitate this coordinated, landscape-scale habitat conservation. We also encourage USFWS to continue its investments in environmental restoration efforts such as dam removal and river restoration in this area, and greatly appreciate the restoration investments that the USFWS has made in recent years in Plymouth and on Cape Cod.”

Response: The purpose of the proposed LPP/EA is to identify areas where Service acquisition (fee and easement) can complement existing programs that conserve and manage shrubland and young forest. There are several existing Service, State, other Federal, and non-governmental organization programs that provide technical assistance and funding for habitat management. For example, two programs include the U.S. Department of Agriculture–NRCS’s Working Lands for Wildlife program and the Service’s Partners for Fish and Wildlife program. We discuss these programs throughout the draft LPP/EA.

Opposition to the Proposed Action

(Letter ID# 56, 124, 134, 135, 262, 264, 314, 366, 376, 445, 453, 459, 460, 461, 462, 465, 473, 476, 530)

Comment: Several commenters noted their opposition to establishing Great Thicket NWR for various reasons which included: “state agencies already involved are taking care of the management of the land already” and “object based on current fiscal concerns” and “this is a waste of space.” Several commenters voiced their opposition to the refuge in general, within the state of Rhode Island, and specifically the town of Charlestown, Rhode Island, noting that “existing open space is sufficient.”

Response: We understand that some are concerned that the refuge may interfere with State programs. Our proposal is not meant to compete with any State or other programs or to imply that States are not doing an excellent job managing their resources. Our proposal intends to complement and supplement existing programs to conserve and manage young forests and shrublands for declining species. It is an attempt to add an additional tool to the existing conservation partnership effort for shrublands.

We also understand concerns about the current funding realities (see chapter 2 of the draft and final LPP/EA). However, our proposal is a strategic, long-term plan that we fully expect many decades to fully realize. Over that timeframe, there are likely to be fluctuations in funding. We will continue to use traditional Federal acquisition funding sources, as well as to work with partners to secure additional funds and grants to support this proposal.

We respectfully disagree that existing open space is sufficient to conserve declining wildlife species dependent upon shrubland and young forests. As we describe in chapter 1 of the draft LPP/EA (see section titled “State of Shrubland-Dependent Wildlife,” “Threats to Resources,” and “Purpose of this Proposal”), these habitats and associated wildlife species are declining across the region. Early successional habitat is one of the rarest habitats in this region, yet it remains a crucially important resource for numerous wildlife species. These habitat types are identified as priorities by all six states and are vulnerable to development and conversion to other land uses. Although we are working with several public and private stakeholders, conservation by these partners alone will not be sufficient. We believe that Service acquisition of fee title and conservation easements is an important component in the conservation of these wildlife species.

Comment: A Dutchess County New York official specifically requested that lands located within Great Thicket NWR boundary, to the west of the Ten-Mile River and outside the exempted Route 22 corridor; be acquired through the use of easements and management agreements only.

Response: In response to the Dutchess County Executive's concerns about the Route 22 corridor (see section below entitled, "**Impacts on Towns**"), we modified the Northern Housatonic RAFA to exclude all lands west of Route 22, resulting in the removal of about 4,000 acres from this focus area. We also added a sixth criterion in the final LPP/EA that will be used to evaluate and guide acquisition decisions on a parcel-by-parcel basis as willing seller opportunities arise. This additional criterion is called "site feasibility" and was added in response to Dutchess County and other local communities who commented that they are concerned about the Service acquiring developed lands or lands that are slated for development as part of the planned growth of these communities. Using this criterion, we will avoid acquisition of commercially zoned properties and approved residential subdivisions due to the higher cost per acre of those properties, and because of the challenges we might face in managing habitats over the long-term that might potentially be surrounded by, or adjacent to, development. The exact wording of this criterion can be found along with our other land acquisition criteria in chapter 2, alternative B, and in appendix A.

We agree that conservation easements and management agreements are important and highly effective tools for conserving and managing wildlife habitat. The Service's policy is to acquire the minimum interest necessary to accomplish refuge purposes. However, the willing seller has the greatest influence over whether a management agreement, conservation easement, or fee title acquisition is the best fit for their needs. It is ultimately the current landowner's decision if they would like to sell an easement or fee title or enter into a management agreement.

Comment: A few commenters were opposed to Great Thicket NWR as it related to Federal land acquisition. However, these commenters did support land conservation by entities other than the Service and partnerships for stewardship via funding and technical assistance. For example, the town of Londonderry, New Hampshire noted, "The town has invested over \$12 million dollars to permanently protect its open spaces. However, the economics of land use in Londonderry have overtaken our ability to fund our land protection effort to any meaningful extent. Additional federal resources and assistance will advance the Town's goal of realizing that its remaining open spaces targeted for conservation will not be developed, while ensuring the land we have already protected will not become fragmented from supporting meta-populations of shrubland species."

Response: We believe our proposal will complement and build upon existing State, Federal and other programs aimed at conserving and managing shrubland and young forest. Some of these programs offer acquisition of interests in land and some offer technical or financial assistance on private lands. We agree that these existing programs are successful in protecting these habitats, but feel that our proposal is another important, necessary tool to help achieve population goals for shrubland-dependent wildlife species.

Comment: Several commenters noted their opposition to Great Thicket NWR stating that the USFWS does not have sufficient resources to manage currently owned properties.

Response: We understand concerns about the current funding realities (see chapter 2 of the draft and final LPP/EA). However, our proposal is a strategic, long-term plan that we fully expect will take decades to fully realize. Over that timeframe, there are likely to be fluctuations in funding. We will continue to use traditional Federal acquisition funding sources, as well as to work with partners to secure additional funds and grants to support this proposal.

As stated in chapter 2 of the draft and final LPP/EA, we will prioritize the acquisition of lands that are more likely to naturally self-sustain as shrublands, or that are close to existing refuges or partner lands, so we can share and leverage our resources to actively manage for shrublands.

Comment: A few comments were received from towns within Dutchess County, New York. These commenters specifically noted their opposition to Great Thicket NWR within the town of Dover stating that they are “totally against the creation of a wildlife refuge in the Town of Dover” and the refuge will “adversely affect potential growth within our community.”

Response: We understand the concerns expressed by the commenters. We carefully evaluated all the comments on the Northern Housatonic RAFA and we worked with Dutchess County and the town of Dover to discuss how we could modify the boundary in a way that would address the concerns of their constituents. For more detail on how and why we modified the boundary, see “**Impacts on Towns**” section below.

Support for Proposed Action

(Letter ID# 2, 49, 55, 61, 65, 109, 110, 147, 150, 162, 164, 165, 282, 323, 327, 331, 347, 363, 369, 372, 376, 387, 393, 475, 501, 506, 520, 532, 6078)

Comment: Several commenters provided various parcels of land they felt should be considered for acquisition as part of the proposed Great Thicket NWR. The reasons varied from parcels that are currently for sale, to property owners interested in selling their land or entering into an easement agreement in order to preserve their property for wildlife, to properties that are owned by others and are in need of protection because of their biological importance.

Response: We appreciate this information and, if the final LPP/EA is approved, we will pass it along to the appropriate refuge manager who will follow up with specific landowners.

Comment: One commenter requested that the draft LPP/EA should be modified to clarify that the USFWS will avoid acquisition of prime farmland in Rhode Island that is currently being used for agricultural purposes. It is essential to avoid competition between the goals of protecting land for agriculture and wildlife. The agricultural community in Rhode Island is concerned that land conservation organizations are taking prime farmland out of production to provide wildlife habitat.

Response: As we mentioned in a previous response, we do not intend to target prime agriculture lands for refuge acquisition. Instead, our priority would be to connect individual landowners with agricultural organizations and State and other Federal agencies to protect these lands as part of an integrated, working landscape. We support enrolling these lands into Federal and State agricultural conservation programs that focus on protecting working lands while also promoting economically viable practices that benefit wildlife, protect water quality, and provide other ecosystem services. Occasionally, we may acquire agricultural lands from willing sellers when other programs are not available to keep the land in production and there is a threat the land will be converted to other uses. In these situations, we may acquire these lands to prevent development, ensure protection of important wildlife habitat, and support public recreation access.

Impacts on Towns

Comprehensive Planning

(Letter ID# 248, 477)

Comment: Request for information was received from two commenters related to how the USFWS will work with towns to determine where development might take place and where land protection would occur.

Additional information regarding how Great Thicket NWR will fit in with specific town comprehensive or master plans was also requested.

Response: While developing the draft LPP/EA we worked on a large, landscape scale. However, we recognize the importance of working on a more local scale as we move towards identifying specific parcels of land to acquire. To this end, we will work closely with towns and counties to ensure that we are aligned with the planned development and growth of these communities. Generally, the lands that have the most conservation benefits are located outside the areas slated for development opportunities.

Socioeconomic

(Letter ID# 108, 125, 139, 172, 178, 248, 280, 320, 366, 372, 376, 379, 415, 432, 446, 451, 453, 456, 459, 461, 462, 465, 472, 487, 500, 519, 527, 535, 538, 6078)

Comment: Concerns were raised from a Dutchess County New York government official related to socioeconomic impacts to the towns within Dutchess County as a result of Great Thicket NWR. Specifically, the County expressed concern that the proposed focus areas include three centers that were identified in the Centers and Greenspaces plan as areas to focus and expand commercial and residential development, thereby making these areas inappropriate for acquisition for habitat preservation. Also, the Harlem Valley has been severely impacted economically over the last few decades by the closure of two significant state facilities which resulted in the loss of thousands of jobs and the closure of many businesses. In their opinion, Great Thicket NWR could significantly impair the Harlem Valley's opportunity to recover and provide jobs and a future for its residents. Consequently, Dutchess County requests that Great Thicket NWR area exempt the portion of the State Route 22 corridor that passes thru it and recommends that the exempt corridor extend 2,000 feet on either side of Route 22. The State Route 22 corridor is the major truck traffic and vehicular highway in the Harlem Valley and its economic lifeblood.

Response: The additional information provided in this comment helps us to understand the local community better and for that we are appreciative. As we begin to undertake more detailed land acquisition planning, we recognize the importance of working closely with counties and towns so we can align ourselves with the planned development and growth of these communities.

As stated in the draft and final LPP/EA, we plan to acquire 2,000 acres in fee or easement within the Northern Housatonic RAFA. In light of our willing-seller policy, we fully expect that it will take decades to reach this goal. In addition, because of the extent of the focus area, acquired parcels are likely to be widely distributed. In chapter 4, we describe the challenges of evaluating the socio-economic impacts on local communities of our proposal because we do not know the timing or location of parcels that would be acquired. However, we do identify the types of economic impacts that are most likely to occur with refuge land acquisition including impacts on local tax revenues, local property values, refuge personnel spending, and refuge visitor spending.

In response to Dutchess County's comment regarding the Route 22 corridor, we modified the Northern Housatonic RAFA to exclude all lands west of Route 22, resulting in the removal of about 4,000 acres from this focus area. While many of these lands have important biological values, they also have considerable regulatory restrictions on development because they are either wetland or floodplain habitat. Therefore, by excluding this area, we felt we could respond to the County's concerns while retaining the ability to fulfill the purposes of our proposal.

Regarding lands east of the Route 22 corridor, we added a sixth criterion in the final LPP/EA that we would use to evaluate and guide acquisition decisions on a parcel-by-parcel basis as willing seller opportunities present themselves. This additional criterion is called "site feasibility" and was added in response to concerns from Dutchess County and other local communities who commented about the Service acquiring developed lands or lands that are slated for development as part of the planned growth of these communities. This criterion would direct us to avoid acquisition of commercially zoned

properties and approved residential subdivisions due to the higher cost per acre of those properties, and because of the challenges we might face in managing habitats over the long-term that might potentially be surrounded by, or adjacent to, development. The exact wording of this criterion can be found along with our other land acquisition criteria in chapter 2, alternative B and in appendix A.

Comment: Several commenters noted that the proposed Great Thicket NWR would be a benefit to communities within the focus areas from a tax perspective. The Nature Conservancy noted their agreement with the Service's assessment of the value of public and economic benefits of Great Thicket NWR stating, "Recreational fishing, hunting, hiking, birdwatching, wildlife observation and nature-based tourism all provide significant economic benefits (2011 - \$348 million) in Rhode Island. The Great Thicket NWR system would improve access to these activities for the public and generate additional revenue for the local economy." One commenter was specifically concerned with a letter sent by Dutchess County Executives stating that they "hope the Great Thicket NWR would not be derailed because of the counties concerns." One commenter asked if there are funds available to cover the loss of local taxation if properties are taken off the tax rolls and if so, requested where additional details regarding this program are available.

One commenter specifically requested the taxable value of all property within the Dover Union Free School District that potentially would be removed from the tax rolls, noting that their school district has the lowest tax base within Dutchess County and further deterioration of their tax base would burden a community already expressing taxpayer fatigue. Several commenters also voiced concern with Great Thicket NWR; noting that it would hurt their town by inhibiting economic growth and affecting property value.

Response: In chapter 4 of the draft and final LPP/EA, we analyze the socioeconomic impacts of our proposal, including the tradeoffs between the potential loss in property taxes and Refuge Revenue Sharing payments and the benefits of open space and conserved lands. When the Service acquires lands in fee, it does not pay property taxes and those lands lose their development potential. However, the Service pays Refuge Revenue Sharing payments to help offset those losses. For more information on the Refuge Revenue Sharing program, please see the "Refuge Revenue Sharing" section in chapter 3 of the draft and final LPP/EA and visit: <https://www.fws.gov/refuges/realty/rrs.html>.

Additionally, studies have found that open space lands, such as refuges, typically provide a net gain in local revenues. This is because open space requires fewer services and expenditures than residential land use. Also, open space often increases neighboring property values and provides public goods, such as recreational opportunities, aesthetic beauty, and water quality protection (see "Effects on the Socio-Economic Environment" in chapter 4 of the draft and final LPP/EA).

Since we have not identified specific parcels for acquisition, estimating the taxable value of all property within the Dover Union Free School District that potentially would be removed from the tax rolls as a result of our proposal requires a large degree of speculation and is beyond the scope of our analysis.

Comment: Several comments were received noting that tourism is an important component of an individual town's economic development and Great Thicket NWR would promote tourism. The Audubon Society of New York and Connecticut noted that "National Wildlife Refuges not only provide a boost to wildlife, they are strong economic engines for local communities across the country. A 2013 national report entitled "Banking on Nature" found that refuges provide \$2.4 billion into the economy nationwide and support more than 35,000 jobs. Spending by refuge visitors generated nearly \$343 million in local, county, state, and federal tax revenue in 2011. The Forest Society believes the Fish and Wildlife Service must continue to highlight how habitat conservation, including the strengthening of water quality within the Refuge's boundary, positively impacts the vitality of our economy, the quality of life we enjoy."

Response: We agree that national wildlife refuges provide important economic benefits to local communities. We hope that the proposed Great Thicket NWR would bring additional benefits to the communities within the RAFAs.

Water Availability

(Letter ID# 248)

Comment: One commenter noted that the removal of trees may diminish the water absorption capacity of the land which is of particular concern in areas where wells are still the main source of water.

Response: We are not proposing large-scale conversion of mature, contiguous forest blocks into smaller, fragmented blocks. Therefore, we do not anticipate impacts on water absorption capacity.

Fire Hazards

(Letter ID# 372, 471)

Comment: One commenter voiced their concern about adequate funding for fire management within the Pine Barrens area. Another commenter inquired if this refuge would create an increased fire hazard.

Response: Fire safety is a priority for the Service in the Pine Barrens area of southeastern Massachusetts. The Service has its own prescribed fire and wildlife fire specialists, as well as a regional and zone fire management program, which is now jointly administered with the National Park Service. The Service also has strong partnerships with the State of Massachusetts and local fire departments in the Pine Barrens area. We work with partners to host a variety of wildland fire fighter training opportunities which are offered to State and Federal fire fighters as well as to local fire departments who are usually the first responders at a wildfire. All these resources enable the Service to better manage these lands and mitigate the potential risk of wildfire.

Currently, the Service has an active hazardous fuels management program that has been used to manage lands at Massasoit and Mashpee NWRs, as well as on surrounding public and private lands, in an effort to reduce the risk of wildfire and improve habitat for wildlife.

In previous fiscal years the Service has typically received funding from the National Fire Budget for fuels management in this area. These funds are leveraged with additional partner funds and in-kind services to help us administer high priority hazard fuels reduction projects.

Administration

Budget and Staffing

(Letter ID# 95, 352, 415, 485)

Comment: Several comments were received related to the budget and staffing for Great Thicket NWR. One commenter requested that, “USFWS provides adequate resources towards the ongoing management needs of any lands acquired as part of the Great Thicket NWR” and “ensure adequate funds are provided at the earliest possible time to respond to current conservation opportunities.” Another commenter asked if funds are being appropriated to cover the cost of maintenance for Great Thicket NWR. The Massachusetts Audubon Society requests that the, “USFWS commit to the staffing and resources necessary over the long haul to maintain these young forest and shrubland habitats for the ecological resources for which they are originally acquired.” The Massachusetts Audubon Society also noted “hopefully the USFWS can commit to provide sufficient resources for its own land management needs.” Another commenter requested that the USFWS utilize local residents to staff restoration and management efforts.

Response: This project proposes long-term guidance for establishing a new national wildlife refuge. It is a strategic document for identifying and prioritizing areas for acquisition. We expect this project will take decades to fully implement. Exactly where and when lands would be acquired, and whether or not those lands would be acquired in fee or easement, is impossible to determine at this point in time. Each of those factors, combined with habitat condition, all influence what staffing, and operational or maintenance funding, would be needed. In chapter 2 of the draft LPP/EA, we acknowledge that there may be a long-

term need to hire additional staff, and seek additional operations and maintenance funding, depending on the amount and proximity to existing national wildlife refuges. Regardless, our intent is to leverage our resources and work with local residents, State agencies, and our conservation partners to restore and manage habitats. As is true on most refuges, we will first look locally when seeking contractors, equipment rentals, and supplies.

Interagency Coordination and Partnerships On and Off Refuge

(Letter ID# 7, 11, 28, 42, 45, 80, 93, 95, 110, 139, 171, 177, 204, 248, 251, 302, 329, 342, 352, 362, 369, 372, 407, 415, 429, 432, 444, 447, 452, 478, 480, 482, 483, 505, 541, 545, 6078)

Comment: Several commenters requested that the Service partner with various agencies and organizations in order to promote conservation or assist with specific conservation related issues. The following specific comments were received about partnership opportunities:

- One commenter specifically asked if the Service would consider assistance in forming a Regional Conservation Partnership in the southeastern Massachusetts area.
- The Weekapaug Fire District (WFD) noted they are part owner of the Quonochontaug barrier beach in Westerly and Charlestown, Rhode Island. The WFD and other owner organizations are focused on preserving the natural habitat and significant efforts are undertaken each year to protect and preserve the barrier beach. Efforts by the USFWS to monitor the area and assist with related maintenance activities would be appreciated and welcome.
- Does the Service plan on sending any staff (on a temporary or more long term basis) to the area to discuss Great Thicket NWR with local communities, stakeholders, and landowners?

Response: We would continue to work with conservation partners to identify and prioritize appropriate parcels for refuge acquisition. To this end, we anticipate developing land protection partnerships in each of the RAFAs so partners can meet periodically to discuss land acquisition priorities and strategies. Such partnerships exist at many of our other national wildlife refuges and they are very successful.

Each Great Thicket RAFA will be administered by the nearest existing national wildlife refuge. Staff from that refuge will work with local communities, stakeholders, and landowners to discuss Great Thicket NWR goals and objectives.

Distance Between Units

(Letter ID# 314, 479)

Comment: Two commenters asked if Great Thicket NWR would be contiguous to existing conservation lands. Another commenter noted that the distance between parcels within Great Thicket NWR would further complicate successful management.

Response: Nearly all of the proposed Great Thicket NWR RAFAs are purposefully located near existing national wildlife refuges, as well as other conservation partners lands, to maximize resources and realize efficiencies. We have planned our proposed management of Great Thicket NWR to involve the support of existing refuge staffs and other partners.

Habitat Management – General

Support Active Habitat Management

(Letter ID# 47, 51, 95, 111, 113, 130, 156, 208, 251, 264, 296, 302, 306, 329, 348, 369, 405, 409, 415, 419, 452, 500, 545, 6078)

Comment: Several commenters noted their support for active habitat management on the proposed Great Thicket NWR to ensure the goals and objectives are met.

Response: We thank the commenters for their support of our proposed active habitat management. In the draft LPP/EA, we explain our proposed habitat management in Appendix A: Conceptual Management Plan. This appendix explains the types of habitats we would manage for and describes the management techniques we would use to achieve our habitat goals.

Comment: One comment noted that “Forested lands within the focal areas should also be a target for conservation efforts under this proposal. Working within a large forested landscape would offer more flexibility for rotational management and provide a rich variety of natural successional states that will benefit both young forest and forest interior species and accommodate species that require multiple successional stages of forest during their lifecycle. Birds nesting in shrublands within a forested matrix would also be less susceptible to cowbird parasitism and predators associated with residential development.”

Response: We agree. Please see Appendix A: Conceptual Management Plan, for strategies related to managing for shrublands and young forest in a forested landscape. Note, however, that we do not intend to further fragment large forested habitat blocks.

Comment: One commenter requested that consideration should be given to protect or restore grasslands and their characteristic bird species, noting that many of these species are in severe decline. Another commenter requested that habitat for monarch butterflies be incorporated by planting species of milkweed in order to compensate for the loss of meadow habitat.

Response: We agree that grassland habitat, monarch butterflies, other native pollinators, and wildlife species are important and are also declining. The Service is already working with others to conserve and manage for grassland habitats on existing national wildlife refuge and partner lands. Although the focus of Great Thicket NWR is to conserve and manage shrubland habitats for declining shrubland-dependent species, alternative B offers a great deal of opportunity to contribute to monarch butterfly and pollinator habitat goals, as described in chapter 4, Effects on the Biological Environment, in the draft and final document. We intend to make every effort to incorporate pollinator and monarch butterfly habitat management on lands and easements proposed for acquisition.

Appendix A in the draft and final LPP/EA describes the active management we propose to conduct on refuge lands. Many of the management techniques we propose to employ would create a shifting mosaic of habitats types including grasslands, shrublands, and young forests. As we describe on in chapter 1, Status of Shrubland-Dependent Wildlife, restoring milkweed habitat is the most important monarch butterfly conservation and management need. Such management is compatible with early successional forest and shrubland rotational management.

Comment: Several comments voiced support for working with powerline companies to actively manage powerline corridors as habitat for shrubland-dependent species. These commenters noted that there is significant habitat throughout powerline corridors that would be of benefit to the species discussed in the draft LPP/EA.

Response: When managed properly, powerline corridors can provide important shrubland and early successional habitat. Existing powerline corridors provide an important link in the partnership effort to maintain a network of connected shrublands in the Northeast. Some power companies have worked with the Service, States, and partners to improve their management to benefit declining shrubland species, including the NEC. Refuge staff, other Service personnel, and our partners will continue to reach out to additional power companies to help them manage their properties to meet both their needs and those of shrubland-dependent wildlife species. We discuss several partnerships with utility companies at the beginning of chapter 2 in the draft and final LPP/EA.

Comment: Several commenters noted that invasive species need to be controlled and managed in early successional habitat areas as they are rapidly becoming established in areas throughout Great Thicket NWR. Another commenter did not see a specific reference to the management or mitigation of invasive and exotic

plant species within the draft LPP/EA. Another commenter asked what precautions or response measures does the USFWS plan to implement to reduce opportunities for spread or new invasion of non-native invasive plants as a result of land clearing/canopy clearing? Several noted that invasive species are often associated with early successional habitats and were concerned that our proposal would contribute to and exacerbate the spread of invasive species.

Response: We agree that invasive species can be a threat to native habitats and wildlife species and cause ecological damage. We discuss invasive species prevention and management in several places in the draft LPP/EA (e.g., “Invasive Species” in chapter 3; “Managing and Maintaining Existing Early Successional Habitat” and “Invasive Shrub Species and Methods for Control” in appendix A). We plan to use a variety of methods to control, prevent the spread of, and monitor invasive species. The exact methods will depend on the species and the severity of the infestation on any lands acquired.

When undertaking management work, we consider it important to avoid any actions that may promote the spread of invasive species and proactively monitor for new infestations (see “Invasive Shrub Species and Methods for Control” in appendix A of the draft and final LPP/EA). We would also carefully plan our management activities using species-specific guidelines to control existing infestations and limit the accidental spread of invasive species (e.g., inspecting and cleaning equipment).

Comment: Two commenters requested support for active habitat management to control invasive species without using herbicides. These commenters noted, “There is now voluminous literature on the toxicity of glyphosate (and other herbicides) to wildlife, non-target plants, and humans.” Alternatives to using herbicide were requested which include mechanical treatments, prescribed livestock grazing, and other techniques, noting these methods can be used effectively instead of herbicides.

Response: Whenever possible, we try to avoid or minimize the use of herbicides on national wildlife refuges. We plan to use a variety of invasive species control methods, including mowing, pulling, and grazing. In some cases, due to the species characteristics or the severity and extent of the infestation, these methods may not be effective enough to achieve long-term control or eradication. Sometimes herbicides may be the only practical and effective treatment available. The Service’s policy is to only use herbicides in situations where the benefits of controlling invasive populations outweigh the overall risks of using herbicides, and/or other methods are prohibitively expensive, not effective, impractical, or likely to cause more damage than the herbicide. The refuge would only use herbicides that are approved by our regional contaminants coordinator. The contaminants coordinator reviews the herbicides for its potential to impact non-target species, habitats, and water quality. No herbicides with the potential for significant adverse impacts to these resources would be approved. Any herbicides used would only be applied following best management practices to limit potential impacts (e.g., setting buffers around sensitive areas, using the lowest effective application rate, etc.).

Opposed to Active Management

(Letter ID# 18, 51, 248, 262, 302, 429, 436, 487, 541, 6078)

Comment: Several commenters voiced their opposition to clearing or logging mature forests to create shrubland or grassland for Great Thicket NWR. These commenters noted that, “Mature woodlands host their own set of species that require un-fragmented large tracts of forest which are less prone to predation, or specific tree sizes. Low-stature (‘early successional’) habitats can be created and managed without expense to mature forests.”

Response: There are many different species of conservation concern with different habitat needs. Habitat management always has tradeoffs. The purpose of this plan is to address the needs of certain declining shrubland-dependent species. All six states have identified shrubland habitat as a priority and declining regionally. While species that require mature forest are also valuable, there is currently much more of that habitat available in New England and New York.

As we identify lands for acquisition and shrubland management, our top priority is to conserve areas where shrubland habitat already exists and is either naturally persistent or can be actively managed (see “Refuge Acquisition Focus Areas” in the chapter 2 for our list of acquisition criteria). We are not proposing large-scale conversion of high quality, contiguous forest blocks into smaller fragmented blocks.

In some cases, we may harvest trees in forested areas. In these locations, we would aim to mimic natural forest disturbances to create a mosaic of early successional, shrubland, young forest, and mature forested habitats. For many species of forested wildlife species, the patches of shrubland and other early successional near more mature forest is important foraging sites and cover.

Public Perception of Shrubland as Wasteland vs. Habitat

(Letter ID# 248)

Comment: One commenter noted the public perception of shrubland being perceived as wasteland or less visually appealing than forest should be addressed to further support the goals of Great Thicket NWR.

Response: We plan to use many different ways of communicating with others about the importance of shrublands to help remove the “ugly” or “messy” stigma from shrublands. With partners and volunteers, we plan to develop outreach materials and interpretive programs about the benefits to many declining species of wildlife.

Additional Information That USFWS May Want to Consider

(Letter ID# 212, 264, 302, 368, 428)

Comment: Several commenters offered specific information that they felt should have been considered in the draft LPP/EA, or should be considered moving forward. One commenter faulted us for not soliciting biodiversity information from the Rhode Island Natural Heritage Program. Other commenters offered specific GIS information for Federal- and State-listed species, or other species of concern, in certain areas.

Response: We look forward to coordinating further with the Rhode Island Natural History Survey program, as well as other State Natural Heritage Programs, to help us identify specific parcels that will most benefit from Federal acquisition. We recognize that our State and other partners have valuable species data and we will look to these partners to help us realize the mutual conservation goals to benefit shrubland habitat.

Wildlife and Fish Populations Management – General Impacts to Native Birds, Reptiles, and Amphibians

(Letter ID# 248, 264, 295, 369, 487)

Comment: What are the population and habitat goals referred to in the executive summary of the draft LPP/EA?

Response: In the Executive Summary we were referring to the habitat and population goals set in a variety of regional and national plans including the Conservation Strategy for the NEC, the Bog Turtle Recovery Plan, the Northern Red-bellied Cooter Recovery Plan, and the New England/Mid-Atlantic BCR 30 plan. For more information, see “Strategic Growth of the National Wildlife Refuge System” in chapter 1 of the draft and final LPP/EA.

Comment: Another commenter requested more emphasis on non-game bird species.

Response: We agree that migratory birds, especially shrubland-dependent species, will benefit from our proposal. Under the “Birds” section in chapter 3 of the draft and final LPP/EA, we discuss the benefiting species of birds at length. The majority of the bird species we highlight are non-game species, such as brown thrasher, whip-poor-will, blue-winged warbler, prairie warbler, brown thrasher, and eastern towhee. These species function as representative, or surrogates, for many more species dependent on this habitat type.

Comment: What are the impacts of clear cuts on salamanders and amphibian populations?

Response: Many reptiles and amphibians also rely on early successional habitat, shrublands, and young forest (e.g., the State-listed eastern hognose snake, northern black racer snake, and the Blanding's turtle). For all of our management activities, we will use best management practices to limit impacts to wetland habitats and wildlife species.

Comment: There is concern that the future listing of the NEC as a threatened or endangered species could further restrict hunting in areas of Great Thicket NWR designated as NEC habitat. One person asks, "Will efforts to restore this species negatively impact existing hunting activities?"

Response: In September 2015, the Service's Ecological Services program found that the listing of the NEC was not warranted at this time (80 FR 55286). The proposed Great Thicket NWR and other conservation efforts by States, Tribes, non-government organizations, and private landowners are designed to prevent the need to list the NEC in the future. We do not anticipate any changes to respective States' rabbit hunting programs now or into the future. Currently, cottontail hunting is still allowed in New York, Connecticut, Massachusetts, and Rhode Island. Maine closed its cottontail season in 2014, while New Hampshire modified its hunting regulations to prohibit the take of cottontails in those portions of the State where the NEC is known to occur.

Comment: Will the proposal protect enough land to sustain a viable NEC population?

Response: Our proposal is part of a larger effort to conserve and manage habitats for NEC and other declining shrubland wildlife species. The habitats that we are proposing to help protect will not alone sustain NEC populations. However, we hope that our proposal will complement the work of States, Tribes, other conservation groups, and private landowners and ultimately help sustain viable NEC populations.

Impacts from an Increased New England Cottontail Population

(Letter ID# 248, 487)

Comment: A couple of commenters inquired about the impacts of increased NEC. One commenter asked about the impacts to predator populations and another asked about impacts on shrubland success. In addition, will there be management of the NEC if the species rebounds?

Response: NEC appear to live in relatively small populations, so it is unlikely that they will have large impacts on predator populations or shrublands (80 FR 55286). The major predators of NEC are red foxes and coyotes (80 FR 55286). Other common predators are bobcats, house cats, weasels, great horned owls, and red-tailed hawks and other raptors. These predator species are already plentiful and highly adapted to human-dominated habitats. Also, NEC are not a large part of their diet. Eastern cottontails, a very similar species introduced here from other parts of the U.S., are a much bigger part of these species' diets. Regarding impacts on shrublands, we do not have any knowledge of whether any rabbit species impacts shrubland growth. However, if rabbits do in fact have an impact on shrublands, it is likely that the more plentiful eastern cottontails would have a much larger impact than NECs. If the NEC population rebounds, then the partners involved in the NEC Conservation Strategy would likely work together to reassess conservation objectives and strategies for this species.

Impacts to Invertebrates

(Letter ID# 264, 369)

Comment: A couple of commenters asked about the impacts to invertebrates as a result of Great Thicket NWR. Specifically, one commenter noted that the draft LPP/EA stresses impacts to invertebrates in other parts of the document but these impacts are not mentioned on page 4-2. What are the expected biological impacts to Invertebrates (especially to monarch butterfly)? In addition, there is no mention in the proposal of potential impacts to forest invertebrate populations.

Response: We discuss impacts to monarch butterflies and other pollinators in chapter 4 of the draft and final LPP/EA, under the heading “Effects on Federal-listed Species and other Species of Concern.” However, we recognize that the title of this subsection (“Monarch Butterfly”) is misleading because this section also addresses all pollinator species. Therefore, we have changed the title of this subsection to read, “Monarch Butterfly and Other Pollinators.”

Historic, Cultural, and Archaeological Resources – General

State Coordination

(Letter ID# 112, 123, 494, 504)

Comment: Several specific comments were received related to historic, cultural, and archaeological resources. For example, the Maine Historic Preservation Commission (MHPC) stated that it must conduct an archeological resource review of acquired parcels prior to any proposed ground disturbance. Also, if the Service identifies historic buildings on acquired lands, MHPC requests that the Service consult with its office early in the acquisition process.

Response: We take our responsibility to protect historic and cultural resources very seriously. We will continue to consult with the State’s SHPOs as lands are acquired and as we implement projects on the ground, particularly those that include ground-disturbing activities or have the potential to directly or indirectly impact historic and cultural resources. We will also consult with the appropriate State’s SHPOs if we acquire any lands with buildings and structures that are 50 years or older to verify if they are eligible for the National Register.

Tribal Consultation

(Letter ID# 308, 353)

Comment: Additional comments were received related to cultural resource protection and the identification of those resources. One commenter noted how well cooperative efforts to protect Native American ceremonial stone structures has worked in practice when areas are cleared of vegetation noting that, “This collaboration has done a remarkable job of identifying and protecting fragile cultural resources during land clearance activities. It is essential that a similar protocol be established for the Great Thicket NWR.”

Another commenter noted that stone walls, of both Native American and more recent construction, are an area of equal concern. This commenter requested that, “Machinery used to create and maintain the Great Thicket NWR must be of sufficiently narrow width to be driven through wall openings/gateways without impacting the edges of these openings.” In addition, this commenter also requested that only contractors with appropriate equipment should be allowed to participate in project areas where such cultural resource considerations apply.

One commenter also noted that, “The proposed region for property acquisitions contains Native American ceremonial stone and earthen constructions which would be damaged and destroyed by removal of trees and brush in the Great Thicket NWR. This is of particular concern along the borderlands region between Rhode Island and Connecticut, host to the densest concentration of such ceremonial landscapes in the East. The very largest stone constructions (those tens of feet across or larger), which are too large for articulated arms to reach, should be manually cleared with chain saws, girdling or herbicidal injections. Girdling or herbicidal injections should be given serious consideration as low cultural impact method of eradicating trees found in proximity to cultural resources.”

The New England Antiquities Research Association also requested that, “All tribal consultations and oversight would be warranted at all stages of such a protocol, from the initial survey, during cutting activities, and as part of a post-cutting damage assessment.”

Response: We have a very important responsibility to consult with federally recognized Tribes about proposed actions to ensure that we do not adversely impact important cultural resources. Several Tribes in the area, including the Narragansett and Mashpee Wampanoag Tribes, are already working hard to conserve NEC and native shrubland. We will continue to work with all affected Tribes to identify

culturally sensitive areas and resources that require protection, as well as conserving native wildlife and habitats. In addition, we will continue to coordinate with Tribes as we develop more detailed habitat management and visitor services plans to make sure that our proposed actions do not impact cultural resources.

Hunting, Fishing, and Trapping on Proposed Refuge Lands

Support for Hunting and Fishing

(Letter ID# 47, 57, 87, 113, 135, 163, 205, 222, 230, 289, 309, 313, 341, 342, 360, 482, 483, 491, 500, 544, 545)

Comment: Several commenters noted their general support for hunting on Great Thicket NWR along with support for hunting in general stating, “Actively managed public land available for compatible wildlife-dependent recreation, including hunting, is a significant and important social benefit.” Several commenters were concerned about access to the lands that are within Great Thicket NWR. Another commenter requested hunting access without a lottery system or other limited access method. Several commenters noted support of the use of pre-acquisition compatibility determinations to continue hunting on acquired parcels during the period between acquisition and the completion of a Comprehensive Conservation Plan.

Response: The Service is committed to providing access for hunting and fishing on refuge lands, where compatible. Under the 1997 Refuge Improvement Act, hunting and fishing are two of six priority public uses of the Refuge System. The other four priority uses are wildlife observation, photography, environmental education and interpretation. Additionally, Executive Order 13443, Facilitation of Hunting Heritage and Wildlife Conservation, directs the Service “to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat.”

Under “Public Use” in chapter 2 of the draft and final LPP/EA, we describe the process we will use to evaluate newly acquired lands for their potential for public hunting and fishing. In general, we open new lands to these uses when they are determined to be compatible and we have completed a NEPA compliant process. If we decide to open areas of the proposed refuge to hunting and fishing, we will develop a respective step-down plan for each use to detail how they will be managed. Generally, we open these uses consistent with State seasons.

When newly acquired lands have previously been open to priority wildlife-dependent public uses, such as hunting and fishing, we use pre-acquisition compatibility determinations to allow these uses to continue until either a refuge comprehensive conservation plan is completed, or a separate NEPA compliant process has been undertaken, such as those associated with hunting and fishing step-down plans.

Support for Trapping

(Letter ID# 342, 260, 545)

Comment: A few commenters, including the MDFW, stated that their support of the proposed refuge is contingent on allowing regulated trapping, along with hunting and fishing, as a public recreational opportunity. One commenter states, “Very importantly, our interest in the refuge is to allow for equal access for all sporting and recreational use on any newly acquired Federal lands, in accordance with State laws. Hunting, fishing and trapping should be considered as allowable uses on lands that make up the refuge.”

Response: We propose to allow trapping to continue as a tool to manage wildlife populations where it is presently occurring, and where the management need is supported by the respective State fish and wildlife agency. Prior to opening refuge lands to trapping, we would complete a NEPA compliant document, a compatibility determination, and a furbearer management plan.

Opposition to Hunting and Fishing

(Letter ID# 35, 6078)

Comment: A few commenters voiced their opposition to hunting in general noting specifically that, “If this refuge is established I hope there will be safeguards to protect it from hunters.”

Response: As mentioned in the previous comment, hunting and fishing are two of the six priority public uses of the Refuge System under the 1997 Refuge Improvement Act. We consider hunting and fishing to be legitimate, traditional recreational uses of renewable natural resources. The Service's policy permits these uses on a national wildlife refuge when it is compatible with the purposes for which the refuge was established. The decision to permit hunting and fishing on national wildlife refuges is made on a case-by-case basis that considers biological soundness, impacts to wildlife populations and habitats, economic feasibility, effects on other refuge programs, public safety, and public demand.

We will only allow hunting and fishing at Great Thicket NWR where they are determined to be compatible with refuge purposes by the refuge manager; and after we have completed a NEPA compliant planning process and developed a hunt and fishing management plan. The hunt and fishing plans, NEPA compliant document, and compatibility determinations will document our assessment of how these uses can be conducted on refuge lands. In general, we would allow hunting and fishing according to State regulations. These regulations and limits are set annually using data about wildlife populations to ensure that species are not overharvested. State agencies also set safety regulations to reduce any safety concerns (e.g., requiring hunters and recreationalists to wear hunter orange during the hunting season, requiring safety zones around buildings).

In cases where there is the potential for negative impacts on wildlife populations or habitats, or where there are public safety concerns, we will not open certain areas to these uses or we will set additional regulations to reduce impacts (e.g., only allow hunting and fishing outside of sensitive breeding seasons or areas, establish wider safety zones, etc.). We will also monitor any hunting and fishing on the refuge to determine any adverse impacts to refuge resources, and we will adjust the programs if necessary to address any identified impacts.

Priority Public Uses – General

Support for Priority Public Uses

(Letter ID# 15, 47, 57, 85, 104, 230, 243, 289, 348, 377, 414, 439, 496, 499, 500, 524, 535, 544)

Comment: Several commenters noted that, "The Great Thicket NWR should be a place where the public could pursue recreational activities under sensible and reasoned management guidelines, this would serve as a place for wildlife observation, and photography." Other commenters noted that, "The Great Thicket NWR would offer vital access to the outdoors for areas with high concentrations of people where there are limited opportunities for wildlife associated recreation."

Several commenters also noted their support for environmental education and interpretation in general. One commenter requested that the Service encourage and train volunteers for Great Thicket NWR. Another commenter noted that the general public lacks the understanding regarding the importance of shrublands and generally opposes cutting trees. This commenter also noted that it would be beneficial to further educate the public about harvesting trees using sustainable forestry techniques to create young forests benefits wildlife. Another commenter specifically requested that, "signage and other means of educating people who encounter these areas is utilized to educate visitors about the Great Thicket NWR and overall habitat management approach."

Response: Environmental education, interpretation, wildlife observation, and photography are priority public uses of the Refuge System. We are committed to providing opportunities for these uses wherever compatible. We agree these activities can connect visitors with nature and provide them valuable recreational opportunities.

As we acquire lands, we will evaluate how we can offer these uses in compatible ways and, where possible, we will develop trails and other facilities to provide a high-quality experience for visitors. We will also work with partners and others to train volunteers and refuge staff to provide these types of programming and to develop outreach materials. We agree that it is important to share information with visitors about the contribution of shrublands and young forest habitat to wildlife species.

Non-priority Public Uses

Recommendation for Horseback Riding

(Letter ID# 438, 440, 458)

Comment: Three commenters specifically voiced opposition to Great Thicket NWR because the Service would not allow horseback riding. One commenter stated that, “This policy is a travesty to us equine enthusiasts, who enjoy what little space we have to trail ride as it is.” Two others said they conditionally support the proposal of Great Thicket NWR if horseback riding is allowed on the refuge.

Response: Horseback riding is not a priority wildlife-dependent public use on national wildlife refuges.

However, it is allowed on some national wildlife refuges after an evaluation of appropriateness and compatibility with refuge purposes has been conducted by the refuge manager. These determinations are site-specific and based on the best available science and the refuge manager’s professional judgement that the use will not materially detract from refuge purposes. We have not evaluated horseback riding for the proposed Great Thicket NWR because we do not have specific areas on which to evaluate impacts. Once land is acquired for the refuge, the refuge manager will evaluate requests for all non-priority public uses to determine if they are appropriate and compatible for the refuge. We only allow uses that do not conflict with the refuge purposes, are consistent with public safety, can be managed with available resources, and will not adversely impact habitats and wildlife resources.

Climate Change

Climate Change Impacts

(Letter ID# 248, 264, 302, 369, 487)

Comment: Several commenters had questions and comments related to climate change. One commenter asked if cutting trees may reduce the carbon sequestering properties of trees and if so is there evidence to support shrubland being equally able to do this. Another commenter noted the importance of habitat values, carbon storage, and other ecosystem services of mature forests, which cannot be created or re-created quickly in regard to Climate Change.

Response: While it is true that forests sequester more carbon than shrublands, shrublands and other early successional habitats also help sequester carbon. By conserving and managing native habitats, we feel our proposal would continue to prevent development and limit additional greenhouse gases (see “Effects on Climate, Including Effects Related to Climate Change” in chapter 4 of the draft and final LPP/EA).

Since our top priority is to target existing shrublands and areas where shrublands are naturally self-sustaining for acquisition, we do not anticipate converting many acres of forest to shrubland. As described in appendix A, in some cases, we may harvest trees in forested areas. We are not proposing large-scale conversion of forested areas. In these locations, we will aim to mimic natural forest disturbances to create a mosaic of early successional, shrubland, young forest, and mature forested habitats.

Overall, we are proposing to acquire and actively manage a very small percentage of habitat across the region and feel that our proposal would not have a substantial impact on carbon sequestration and climate change.

Comment: Regarding pg. 1-9; pg. 3-5, the MDCR notes that, “Major threats to the success of established refuges are the changing environmental conditions associated with climate change that may, for instance, shift suitable habitats northward.” The MDCR also asked how establishment and management of Great Thicket NWR will address changes in habitats so that they can continue contributing to species population, habitat, and recovery goals? Furthermore, how will management of Great Thicket NWR provide migration corridors to facilitate dispersal of early successional species in the face of climate change?

Response: We recognize that habitats and wildlife species will migrate and change over time due to climate change. Generally, the prediction in North America is that the ranges of habitats and wildlife will generally move upwards in elevation and northward as temperature rises. However, it is difficult to predict exactly the effects of climate change on populations and range distributions of wildlife because

they are likely to be species-specific and highly variable. Depending on the species, these effects may be positive or negative (see “Climate Change” in chapter 4 in draft and final plans).

By conserving connected patches of habitat, we believe our proposal would allow species to move and adapt as significant change occur. One of our criteria for prioritizing parcels for acquisition is landscape connectivity (see “Refuge Acquisition Focus Areas” in chapter 2 of the draft and final LPP/EA). This means we will give priority to parcels that can potentially provide connectivity between extensive patches of habitats for shrubland-dependent species.

Alternative A

Support for Existing Conserved Lands

Comment: Although no commenters specifically stated support for alternative A, several felt that the existing conserved lands in the area and existing State and Federal programs are providing adequate habitat for shrubland-dependent species.

Response: We believe our proposal will complement and build upon the existing State and Federal programs aimed at conserving and managing shrubland and young forest. We wholeheartedly agree that these existing programs are successfully protecting shrubland habitats; however, in our opinion, the amount and distribution is not yet sufficient to achieve population goals for shrubland-dependent wildlife species. We feel our proposal, which includes a strong, committed partnership with others, is another necessary tool to help achieve those goals.

We respectfully disagree that there is adequate amounts of shrubland habitat to support NEC and other declining shrubland species. All six States have identified shrubland habitat as a priority in their State Wildlife Action Plans and have identified many shrubland species as having declining populations.

Alternative B

Support for Alternative B in Full

(Letter ID# 346, 452, 470)

Comment: Although numerous commenters expressed general support of our proposal (see “1. General” above), a few commenters specifically stated their support for alternative B.

Response: We thank these commenters for their support of the proposed Great Thicket NWR. We have the shared goal of conserving and managing shrubland and young forest habitat for declining wildlife species and providing wildlife-dependent recreational opportunities. Assuming approval of this project, we look forward to working with the public and partners as we implement the final plan.

Support for Alternative B with Modifications

(Letter ID# 71, 195, 263, 351, 357, 362)

Comment: Several commenters noted their overall support for the proposed alternative B, but would like to see our proposal further expanded. They requested that the overall acreage of Great Thicket NWR be increased in acreage and/or expanded into other areas of the Northeast and Mid-Atlantic regions.

Response: We thank these commenters for their support for the proposed Great Thicket NWR. After much discussion about the many requests to expand our proposal to include additional acres, we decided that the RAFAs are the right size for allowing us to accomplish the purposes of our proposal, as stated in chapter 1 of the draft and final LPP/EA, under “Purpose of this Proposal.” We did modify the Northern Housatonic and Plymouth RAFAs in response to concerns by state, county, and/or town officials, but we believe we will still be able to meet our goals with these newly configured areas. We address comments about specific RAFAs in the section below titled, “**Specific Focus Areas.**”

Focus Areas – General**General Questions About RAFAs**

(Letter ID# 264, 346, 415, 525)

Comment: We received a few general questions about the RAFAs. One commenter asked about the process used to derive the focus area boundaries. Another commenter requests that the USFWS, “retain a high degree of flexibility in the assignment of the available acres to each focus area.”

Response: We describe the process we followed to identify the focus area boundaries in detail under “Landscape Conservation Design” in chapter 2 of the draft and final LPP/EA. We worked extensively with partners, such as the NEC Executive Committees, respective State land management teams, and the Wildlife Management Institute (WMI), to determine where and how the refuge could best contribute to conserving shrubland habitats. During this process, we selected areas where there was a high degree of overlap in important resources, such as NEC focus areas, threatened and endangered species occurrences, and bird conservation plan focus areas. We then worked with partners to further refine these areas into the ten RAFAs we presented in the draft LPP/EA.

We have designed our focus areas to be somewhat flexible by delineating large areas within which we would work with willing landowners to acquire a smaller amount of land to manage as high-quality habitat. Our goal is to cooperate with, and complement, the conservation activities of our partners.

Comment: Another commenter requested that USFWS, “consider all of the existing New England cottontail Focus Areas as Conservation Partnership Areas in the planning for this new Great Thicket NWR, allowing wider efforts to conserve shrubland birds and other early successional species in partnership with private landowners and other conservation partners in areas already identified as a high priority for this group of species.”

Response: We agree that all of the NEC Focus Areas are, indeed, “Conservation Partnership Areas.” In chapter 2 of the draft LPP/EA, under the section entitled, “Alternative B - The Service Preferred Alternative,” we describe how we relied heavily on the NEC Focus Areas to delineate our own RAFAs. Indeed, we are already involved in conservation partnership work in many of these NEC Focus Areas, as described in alternative A of the draft and final LPP/EA. The proposed Great Thicket NWR, with its 10 RAFAs embedded within NEC Focus Areas, offers the additional tool of Federal land acquisition to help accomplish the goals and objectives set forth in the NEC Conservation Strategy, and to help accomplish additional population goals for shrubland-dependent wildlife.

Specific Focus Areas**Connecticut: Pachaug-Ledyard RAFA**

(Letter ID# 3, 66, 102, 103, 111, 114, 126, 170, 173, 174, 187, 191, 197, 200, 206, 224, 239, 249, 251, 257, 259, 276, 279, 292, 308, 311, 323, 343, 345, 350, 356, 359, 371, 386, 410, 411, 412, 415, 424, 466, 474, 485, 490, 525)

Comment: Several comments were received regarding the Pachaug-Ledyard RAFA in Connecticut. General comments requested the USFWS adjust the focus area boundary to preserve more area, to protect various existing conservation areas, or to protect areas with suitable NEC habitat. Commenters also noted that the focus area boundary in Ledyard is too far south, dividing in half the recently acquired 300-acre Groton Open Space Association’s Avery Farm which straddles the Ledyard-Groton town line. The importance of the Avery Farm is noted with the presence of NEC’s confirmed on this property. The powerline corridors traversing Avery Farm westward to the Groton Reservoir and over to the western side of the reservoir system in Ledyard were also requested to be included in the Pachaug-Ledyard RAFA. Commenters also noted that the current Ledyard RAFA boundary excludes a key open space at-risk parcel link (Watrous Farm) in an otherwise complete north-south wildlife corridor in this area, in addition to other large privately owned parcels, one of which abuts a large Nature Conservancy property, the Pike-Marshall Preserve. Other commenters requested that the proposed northern border of the Pachaug-Ledyard RAFA be moved to mirror the NEC Focus Area in this part of Connecticut and they preferred the inclusion of Preston over to

the Pachaug Forest. In addition, the line at West Mystic, in Groton was requested to be extended farther to the east in order to extend greenways in that area. It was also noted that worthy habitat lie to the west of the Groton Utilities' Ledyard reservoir. The Lamb Farm has suitable habitat for the NEC and other species. Commenters requested that consideration be given to expanding the focus area boundary northward to Rose Hill Wildlife Management Area, noting that this area already has large restoration plots for NEC habitat. Another commenter stated that the focus area appears to avoid the State of Connecticut's wildlife management areas, but could include land along the Mystic River, Pawcatuck River and the shoreline between them.

Response: We appreciate the support for expanded Federal authority to acquire and protect lands in southeastern Connecticut. However, we believe the current configuration of this RAFA is appropriate for achieving the purposes of our proposal, as stated in chapter 1 under the section entitled "Purpose of this Proposal." We deliberated on every additional area that commenters suggested we add to our proposal. We studied maps of the suggested additions and overlaid GIS data layers of Federal threatened and endangered species, highly ranked NEC parcels, and other biological data, just as we did when we created the original RAFAs and as described in chapter 2 of the draft and final LPP/EA, under "Alternative B - The Service-Preferred Alternative." After further analysis, we found there was no strong biological justification for expanding the Pachaug-Ledyard RAFA. We recognize that many of the suggested expansion areas are biologically important to NECs and other shrubland-dependent wildlife; however, we do not believe that these areas need to be in the Pachaug-Ledyard RAFA to maintain their biological value. The purpose of delineating the RAFAs is to specify the area in which the Service would have the authority to acquire interests in land. Many of the suggested areas are already protected by other conservation partners and could benefit from a variety of other tools to maintain their biological values, such as federally funded shrubland management programs. Suggested areas that are not already protected could benefit from some of our partners' land acquisition programs. In chapter 2, under the section entitled, "Alternative A - No Action," we describe the many public and private partnership efforts that have contributed to shrubland management and protection in all six States involved in the NEC Conservation Strategy since approximately 2010. These tools continue to be available and we believe many of the areas identified by commenters in southeastern Connecticut could benefit from them.

Comment: One person wrote, "The statement is made on page 2-6 that the "Pachaug-Ledyard Focus Area in Connecticut includes areas that are important to the federally listed piping plover;" but shoreline areas appear to be excluded. This commenter also questioned whether Sandy Point Island and Ram Island (Map #17 in the draft and final LPP/EA) are included in the Pachaug-Ledyard RAFA.

Response: We included in the Pachaug-Ledyard RAFA any shoreline areas that have high conservation partnership potential for shrubland-dependent species. These areas could also benefit the federally listed piping plover. With regard to Sandy Point and Ram islands, both these island are within the approved acquisition boundary of the Stewart B. McKinney NWR; however, Sandy Point Island is currently managed by the Rhode Island NWR Complex. Neither of these islands is within any of the proposed Great Thicket RAFAs.

Comment: Regarding the Pachaug-Ledyard, RAFA, some commenters requested that the entire town of Ledyard be included in Great Thicket NWR noting that the current boundary is missing key areas for conservation.

Response: We appreciate the support for expanded Federal authority to acquire and protect lands in the town of Ledyard. However, as we developed this proposal, we quickly realized that we could not pursue every area recommended to us. It was necessary to be strategic and prioritize those areas that met our specific criteria (re: chapter 2, alternative B description, in both draft and final LPP/EAs) in order to make the most significant contribution to shrubland-dependent species conservation. We also wanted to complement the conservation partnership work underway by others. As such, we felt that it was not strategic to include the entire town of Ledyard. As stated in our response above, we believe the current

configuration of this RAFA is appropriate for achieving the purposes of our proposal as stated in chapter 1 under the section entitled “Purpose of this Proposal.”

Comment: Several commenters requested that the old Watrous Farm, located at 423 Colonel Ledyard Highway in Ledyard Connecticut, be included in Great Thicket NWR, noting that the property is currently under threat of development. These commenters also noted that this particular property is primarily meadowland running along Haley’s Brook with most of the property shown on the Natural Diversity Data Base maps as important with DNA evidence of the NEC on a neighboring property.

Response: We recognize that the Watrous Farm may have conservation value for the NEC and other shrubland-dependent wildlife. However, as stated above, we believe the current configuration of the Pachaug-Ledyard RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in Connecticut (see the draft and final LPP/EA, chapter 2, Alternative A- No Action) to inquire about land protection options for the Watrous Farm.

Maine: Berwick-York Rollinsford RAFA
(Letter ID# 409)

Comment: One commenter noted that, in regard to the Berwick-York RAFA in Maine, the boundary lines should be adjusted stating that, “the inclusion or exclusion of specific parcels gives the appearance of personal influence. In addition, request that Vaughn Woods and golf courses are included, along with the Rachel Carson Wildlife Refuge in the upper reaches of the York River.”

Response: We contacted this commenter and explained that the reason for the jagged edges in the southeast portion of the Berwick-York RAFA is because the existing Rachel Carson NWR abuts the boundary line in this area of the RAFA, as shown on “Map 5: Berwick-York and Rollinsford Refuge Acquisition Focus Areas” in the draft and final LPP/EA. The commenter was satisfied with this response.

Maine: Cape Elizabeth-Scarborough RAFA
(Letter ID# 70)

Comment: One commenter noted that there are areas that could be acquired for a new national wildlife refuge in Cape Elizabeth/Scarborough, Maine which, “encompass many lovely parcels that will otherwise soon be developed and lost to wildlife forever.”

Response: We recognize there may be parcels in the Cape Elizabeth/Scarborough area that are not included in the Cape Elizabeth-Scarborough RAFA but that may have conservation value for shrubland-dependent species. However, we believe the current configuration of this RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in Maine (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

Massachusetts: Mashpee RAFA
(Letter ID# 318, 369, 444, 491, 498)

Comment: Two comments were received related to the Mashpee focus area. One commenter noted that the 1,500 proposed acres in the Mashpee focus area seems extremely optimistic for such a densely developed area with relatively small parcel opportunities. Another commenter requested the Mashpee focus area boundary be expanded to specifically include properties, “as noted during the March 2 meeting.” Other commenters suggested that this focus area be extended east into the town of Harwich and north to include the Frances A. Crane wildlife area. Another commenter requested the boundary be extended to include protected areas in the town of Falmouth.

Response: Since establishing the Mashpee NWR in 1995, we have been working in this area and we understand that it is a very fragmented landscape. Our approach to achieving conservation goals for the Mashpee NWR has been to work closely with local partners who also protect and manage lands in this area. Since the creation of Mashpee NWR, the Service and its partners have worked together under a signed Memorandum of Understanding that has provided a formal basis for cooperation and coordination. We believe that the proposed Mashpee RAFA would operate in much the same way. In addition, we believe there are, in fact, 1,500 acres or more in the Mashpee RAFA that could be further conserved and managed. We would work with our partners to decide who is best suited to protect which properties so as to minimize impacts to this fragmented landscape.

We recognize there may be parcels in the Mashpee area that are not included in the Mashpee RAFA but that may have conservation value for shrubland-dependent wildlife. However, we believe the current configuration of this RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in southeastern Massachusetts (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

Massachusetts: Plymouth RAFA

(Letter ID# 61, 98, 106, 120, 149, 168, 190, 272, 336, 337, 368, 399, 428, 449, 454, 464, 471, 475, 497, 499, 545, 6078)

Comment: Requests for various changes to the Plymouth MA focus area were received from several commenters. Specific requests include the addition of Boot Pond, Big Sandy Pond, White Pond and Long Pond all located in Plymouth Massachusetts. Commenters also requested that the focus area boundary be expanded to include the areas associated with the town of Bourne. Additional requests to adjust the boundary were recommended that include the State-designated Herring River Area of Critical Environmental Concern, the Pilgrim nuclear plant.

Response: We recognize there may be parcels in the Plymouth area that are not included in the Plymouth RAFA but that may contain important biological resources. However, we believe the revised configuration of this RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in southeastern Massachusetts (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

Comment: The MDFW commented about the potential effects of the Service establishing Great Thicket NWR within the Plymouth area, an area which is already substantially owned and managed as conservation land by the State and includes other land that MDFW has identified as future priorities for conservation and habitat management.

Response: Our intention in proposing the Plymouth RAFA was not to compete with MDFW's important conservation work in this area but rather to complement the work already being done. However, after several discussions with MDFW, we now understand that much of the area within the original Plymouth RAFA is owned or managed by MDFW and MDCR, or it has been identified by the State as a future priority for conservation and habitat management. Therefore, we have agreed to scale back the scope of the Plymouth RAFA, which was proposed as 43,035 acres in the draft LPP/EA. The revised Plymouth RAFA encompasses 3,698 acres and will exactly match the critical habitat area designated in 1980 for the federally listed northern red-bellied cooter. Our target acquisition will remain at 500 acres. We believe this revised focus area would still allow us to support cooter recovery efforts as well as assist with shrubland and young forest management and protection in the Plymouth area.

We will continue to coordinate with MDFW on strategies for land protection, habitat management, and public access within the Plymouth RAFA.

New Hampshire: Oyster-Dover-Bellamy RAFA

(Letter ID# 24, 346, 393)

Comment: One commenter requested extending the Oyster-Dover-Bellamy RAFA to include the land adjacent to the Bellamy River up to the Bellamy Reservoir. Another commenter noted the allocated acres for the New Hampshire focus area is very modest given the total acres in each focus area. Another person requested that the focus area boundary be expanded to include the areas associated with the town of Hampton, New Hampshire, including “the gem of an area that is the Hampton Seabrook harbor.”

Response: We recognize there may be parcels in this area of New Hampshire that are not included in the Oyster-Dover-Bellamy RAFA but that may have important biological resources. However, we believe the current configuration of this RAFA and the target acquisition of 500 acres is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in southern New Hampshire (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

New York: Northern Housatonic RAFA

(Letter ID# 10, 84, 201, 312, 380, 407, 415, 429, 445, 452, 535)

Comment: Several requests were received related to expanding or otherwise modifying the Northern Housatonic RAFA. One commenter noted that, “The boundary is inadequate and should be expanded to better reflect the conservation needs and distribution of the New England cottontail in this area.” Another commenter asked how the Northern Housatonic RAFA was delineated, noting that the boundary has a natural shape with the exception of the area where the boundary follows the Connecticut border. One commenter requested that the boundary of Great Thicket NWR be extended to include the full length of Duell Hollow in New York, noting that there is an area identified as potential habitat for the NEC. Another comment was received that requested incorporation of the Appalachian National Scenic Trail (ANST) into this RAFA where alignments currently overlap. In addition, this commenter requested expansion of the southern reaches of this RAFA which currently lie 2.7 miles north of the ANST corridor, noting that New England cottontail have been documented in this section of the ANST corridor.

Response: We describe how we delineated all the RAFAs, including the Northern Housatonic RAFA, in chapter 2 of the draft LPP/EA, under the section entitled, “Alternative B - The Service-Preferred Alternative.” We believe our focus areas would make an important contribution to the conservation needs and distribution of NEC, especially in light of our partners’ efforts.

We recognize there may be areas such as Duell Hollow that are not included in the Northern Housatonic RAFA that have conservation value for NEC and other shrubland-dependent wildlife. However, we believe the revised configuration of this RAFA, with the exclusion of 4,000 acres west of Route 22 as explained above under the section entitled, “**Federal Land Ownership-General,**” is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in this part of New York (see the draft and final LPP/EA, chapter 2, alternative A - No Action) to inquire about land protection options for these properties.

We did, however, decide to extend the Northern Housatonic RAFA southward to include portions of the ANST. Although some of the lands around the ANST are already protected, many of these lands are not being managed for federally listed or shrubland-dependent species. As such, we believe this area provides the potential for significant partnership opportunities that would allow the Service to manage for target

species while minimizing costs. The new area lies east of Route 22 to fulfill our commitment to Dutchess County to minimize our presence in the Route 22 corridor. In addition, this new area circumvents the developed area of Wingdale because, in general, the Service would avoid acquisition of commercially zoned properties and approved residential subdivisions due to the higher cost per acre of those properties, and because of the challenges we might face in managing habitats over the long-term that might potentially be surrounded by, or adjacent to, development. The new area only contains lands in the town of Dover and does not include sections of the ANST located in other towns within Dutchess County.

This new area adds approximately 2,367 acres to this focus area. After subtracting the 4,143 acres west of Route 22 that were excluded in response to comments from Dutchess County, the revised Northern Housatonic RAFA is now 33,883 acres, compared with the original size of 35,727. In recent discussions with Dutchess County and the town of Dover, representatives were supportive of the new configuration of this RAFA.

Comment: Several comments were received regarding the Northern Housatonic RAFA that specifically requested the USFWS include areas around the Audubon holdings in Sharon, Connecticut, as part of Great Thicket NWR. Specifically, Connecticut Audubon Society noted that the focus area boundary should be modified to incorporate the Macedonia Forest, “a large forested landscape south of the 1,150-acre Sharon Audubon Center known as the Macedonia Forest.”

Response: We recognize there may be areas such as the Macedonia Forest in this part of Connecticut that are not included in the Northern Housatonic RAFA but that have important biological resources. However, we believe the current configuration of this RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact other conservation partners who are already working in this part of Connecticut (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

Comment: Several commenters requested that additional land within the Great Swamp Watershed be included within the Northern Housatonic focus area. One commenter noted that the proposed acquisition boundary includes the northern reaches of the Great Swamp, which was noted as being a site recognized as an Important Bird Area (IBA) by the Audubon Society and BirdLife International. These commenters requested that the acquisition boundary be expanded to include the majority of this IBA to complement the conservation efforts that are currently taking place in this area.

Response: We acknowledge that the Great Swamp Watershed has significant biological resources and would benefit from additional conservation efforts. However, we believe the revised configuration of the Northern Housatonic RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in this part of New York (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for the Great Swamp Watershed.

Comment: A couple comments were received related to the Pawling area south of the Northern Housatonic RAFA. One commenter mentions a particular site in Pawling, New York addressed in a letter by the Service to the Pawling Planning Board expressing, “...concerns regarding the potential adverse effects development of the property might have.” The commenter goes on to state that, “Based upon bog turtles and New England cottontail existing relatively close to the proposed focus area and their protection being a significant factor in establishing the Great Thicket NWR, I strongly suggest the Great Thicket NWR boundary be expanded southward to approximately River Road in Pawling, New York.” Another commenter requested that this focus area boundary be extended to the south, noting that the community has a considerable amount of suitable shrubland habitat that meets Great Thicket NWR’s highest environmental criteria. Another commenter

requested the southern boundary of the Reserve be expanded to the Haviland Hollow Valley where 1,000 acres are already conserved.

Response: A letter written by the Service's New York Ecological Field Office in 2013 was sent to the town of Pawling's Planning Board chairman in response to a proposed residential development project in the town of Pawling. The purpose of the letter was to notify the town of Pawling of potential adverse effects on Federal trust species from the proposed development project, and to recommend measures to avoid impacts.

We recognize that there are many sites in this part of eastern New York that contain known or potential occurrences of bog turtles and NECs and we are pleased that, as stated above in our response to the comment about the ANST, we were able to extend the boundary of the Northern Housatonic RAFA southward to include some of these areas. However, we did not extend the boundary as far south as the town of Pawling. We encourage the commenters to contact our conservation partners who are already working in these other biologically important areas of New York (see the draft and final LPP/EA, chapter 2, Alternative A - No Action) to inquire about land protection options for these properties.

Rhode Island: Rhode Island East-West RAFA

(Letter ID# 23, 49, 122, 139)

Comment: A few commenters submitted requests related to the Rhode Island East-West RAFA. One commenter requested that the Hunt-Annaquatucket-Pettaquamscutt aquifer (located in North Kingstown/East Greenwich) be included in this RAFA, noting that "This aquifer is the principal source of drinking water for that area." Another commenter requested that the Hopkinton portion of this RAFA be extended to the north, adjacent to the Pachaug-Ledyard focus area. Another commenter noted concern that the area of protection outlined for Rhode Island does not include any part of the town of Richmond. Another commenter noted that within the Rhode Island East-West RAFA there are several large forest blocks that are greater than 500 acres in size which support multiple forest-dependent species of global conservation need (SGCN), with some species at their only locations in Rhode Island.

Response: We recognize there may be areas in this part of Rhode Island that are not included in the Rhode Island East-West RAFA, but that nevertheless have important biological resources. However, we believe the revised configuration of this RAFA is appropriate for achieving the purposes of our proposal. We encourage the commenters to contact our conservation partners who are already working in this part of Rhode Island (see the draft and final LPP/EA, chapter 2, alternative A - No Action) to inquire about land protection options for these properties.

With respect to the concern about converting large forest blocks to shrubland, we reiterate that our top priority is to conserve areas where shrubland habitat already exists and is either naturally persistent or can be actively managed (see "Refuge Acquisition Focus Areas" in chapter 2 for our list of acquisition criteria). We are not proposing large-scale conversion of mature, contiguous forest blocks into smaller fragmented blocks. We hope to augment and complement partner efforts to stem the decline of shrubland and young forest habitat, and improve shrubland habitat connectivity where possible. Although we may harvest trees in some forested areas, we would aim to mimic natural forest disturbances to create a mosaic of early successional, shrubland, young forest, and mature forested habitats. For many forest interior wildlife species, patches of shrubland and other early successional habitat located near mature forest offers important foraging sites and cover.

Table C1: List of Commenters with Identification Number.*

Letter #	Commenter Name	Commenter Affiliation (If Applicable)
1	Peter Gardner	
2	Bradford Kendall	Dutchess County Clerk
3	Dawn Fine	
4	Armend Tagani	
5	Donald Mengay	
6	CJ Sanchez	
7	Sharl Heller	
8	Joan Pierce	State of Massachusetts
9	Barbara Holtz	
10	Patrick Comins	Audubon Society, Connecticut
11	Nick Czajka	Congressman Gibson (NY-19)
12	Robin Reed	State of Maine
13	Matthew LeBeau	Senator Blumenthal (CT)
14	James Rosenberg	
15	Diana Daniels	
16	Linda Riebel	
17	Geoff Lizotte	
18	Paul Whitcomb	
19	Marc Sakowski	
20	Rob Zanardelli	
21	Laura McNamara	
22	Scott Lenhart	
23	Antonia and Tom Bryson	
24	Gayle Sweeney	
25	Karen Anne Kolling	
26	Ernest Panciera	
27	Dale L. Paquette	
28	Dan Williams	Backcountry Hunters and Anglers
29	Elizabeth Stacey	
30	Chris & Irene	
31	Lisa Meeks	
32	Garrett Janes	
33	Miles Chapin	
34	Jane and Bill Cooper	
35	J. Carlson	
36	Richard C. Holliday	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
37	Margaret Donahue Lynch	
38	Wynn Gerhard	
39	Gregory Martin	
40	Jack Redus	
41	Bill Hancock	Maine Department of Inland Fisheries and Wildlife
42	Frank J. Kinney	Town of Weekapaug, Rhode Island: Fire District
43	Sarah Perry	
44	Martha Jaquith	
45	Harvey Perry	Westerly Land Trust
46	Paula Barrett	
47	Elizabeth Marks	
48	Matt Penella	
49	Denise Poyer	Richmond Rural Preservation Land Trust
50	Daniel Barrett	
51	Oakes Plimpton	
52	Alison Barrett	
53	Barbara Amos	
54	John Delano	
55	Brian Mossey	
56	Roisin Druta	
57	Matthew McKenzie	Backcountry Hunters and Anglers
58	Mary Wynne-Yee	
59	Suzanne Malaguti	
60	Barbara Drummond	
61	Orin Meyer	
62	Richard Enser	
63	Karen N. Franco	
64	Von Huene-Greenberg, Dorothee	
65	Tim Halle	
66	Anne Roberts-Pierson	Town of Groton, Connecticut: Open Space Committee
67	Sarah Sheehan	
68	Todd Gregory	
69	Heather Parker	
70	Scott Cronenweth	
71	Rich MacDonald	
72	Linda Pistolessi	
73	Sam Hawkey	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
74	James and Rosemarie Coney	
75	Robert C Watson III	
76	Dr. Herster Barres	Reforest the Tropics
77	Matt Snurkowski	Town of Groton, Connecticut: Open Space Committee
78	Ian Carlsen	
79	Karen Cote	
80	David Govatski	
81	Tom Keer	New England Outdoor Writers Association (NEOWA)
82	Nathan Pearson	
83	Susan and Paul Billing	
84	Michael Towle	Western Connecticut Council of Governments
85	Leslie Kramer	
86	Gene A. Schott	Thornton Burgess Society
87	Kenneth Reback	
88	Elizabeth Gordon	
89	Karlene Schwartz	
90	Todd McLeish	
91	Marty	
92	Dorie Stolley	
93	Edward Henry	Natural Resources Conservation Service, New York
94	Scott Mori	
95	Valorie Francis	
96	Raymond Pierson	
97	Jackie Bacon	
98	Kathryn Marks	
99	Dexter Anderson	Conservation Committee, Stoneridge Retirement Committee
100	Maryann Gianantoni	
101	John Nelson	
102	Michael Graner	
103	Steve Foltz	
104	Maia Draper-Reich	
105	Marty Collins	
106	Elizabeth Dill	
107	Mary and Donald Devine	
108	Sarah Geer	
109	Stuart Santoro	
110	Rupert Friday	Rhode Island Land Trusts

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
111	Michele Fitzpatrick, Beth Sullivan, Susan Sutherland	Avalonia Land Conservancy
112	Linda Mackey	New York State Historic Preservation Office
113	Michael Pierdinock	
114	Rick Newton	
115	Victor G Villagra	
116	Mike Ellis	
117	James Furlong	
118	Allison Tuttle	
119	Barbara Kingsland	
120	Lynne and Russ Hopping	
121	Rebecca Noreen	
122	Donna Hutchinson	
123	Edward F. Sanderson	Rhode Island Historical Preservation & Heritage Commission
124	M.H. Smith	
125	Linda R Gould	New Hampshire House of Representatives
126	Mark Bancroft	Town of Ledyard, Connecticut
127	John W. Irwin	
128	Liesbth Slosberg	
129	Jonathan Woodman	
130	Charlie Chase	
131	Mike Murphy	
132	Joel Straus	
133	Eugenia Villagra	Groton Open Space Association
134	Edward Henry	
135	Damon Brooks	
136	Rita Buchanan	
137	N/A	
138	Kathy Hale	
139	Harvey Buford	Hopkinton Rhode Island Conservation Commission, Hopkinton Land Trust, Southern Rhode Island Small Farmers Association, Southern Rhode Island Conservation District
140	David Bareford	
141	Grace E. Fleming	
142	Tom Lescoe	
143	Jan Hine	
144	Elizabeth Coffey	
145	Mark Goldberg	
146	Kristin Croci	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
147	Tom Gentz	
148	Steven Coffey	
149	Joe Duffy	
150	John W Parsons	
151	Joanne Evans	
153	Mark Robinson	The Compact of Cape Cod Conservation Trusts, Inc.
154	Diane LeDuc	
155	Jane Allen	
156	Puryear, Kristen	Maine Natural Areas Program
157	Andrew Mason	New York State Ornithological Association, Inc.
158	Christie Lowrance	
159	Barry Haskell	
160	Catherine E. Palmer	
161	Sue Walker	
162	Tonia Shoumatoff	
163	Michael S. Giancola	
164	Rev. James H. Hornsby	Green Futures of Fall River
165	Tonia Shoumatoff	
166	Barbara Kamman	
167	Laurie Wallace	
168	Jack and Colette Dill	
169	Francis Geer	
170	Sidney Van Zandt	Groton Open Space Association
171	Susan Vincent	North Stonington Garden Club
172	Phoebe Geer	
173	Virginia Beall	
174	Joan Smith	Groton Open Space Association
175	Merrily Lyon	
177	Jane Weidman	Town of Charlestown, Rhode Island: Planning Commission
178	Mark Stankiewicz	Town of Charlestown, Rhode Island: Town Administrator
179	Charlotte Russell	
180	Gary Wilson	
181	David Hrobuchak	
182	Susan Barbarisi	
183	Ethan Warren	
184	Henrietta Cosentino	
186	Dotsie Davis	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
187	Cyndi Riffle	
188	John Tyler	
189	Andrew Varner	
190	Craig Richards	
191	Tom Riffle	
192	Andrew Sessler	
193	Sherry Pethers	
195	Donald Henderson	
196	John Sullivan	
197	Jan Michael	
198	Christopher Neill	Marine Biological Laboratory
199	Jessica Wolak	
200	Valerie Hazlin	
201	Gordon Douglas	
202	John Verling	
203	Arne Olsen-Storvik	
204	Owen Waske	
205	Martin Curlik	
206	Carl Tjerandsen	
207	Mike Murray	
208	Anthony Liguori	
209	Dan Randall	
210	Bob Sherman	
211	Chip Bonde	
212	Greg Taczak	
213	Dan Hass	
215	Richard Lieberman	
216	Martha Hays	
217	Patrick McGoldrick	
218	Bob Morgner	
219	Michael Doane	
220	Bill Krazinski	
221	Jim Savage	
222	Dale Arenz	
223	Howard Kligerman	
224	Ruth and Brian Dirlam	
225	Anthony Lucci	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
226	Randy Slaktowski	
227	Rodney Canterbury	
228	Ron Swisher	
229	Semena and Martin Curlik	
230	George Fleszar	
231	Kelly Krechmer	
232	Eric Gracey	
233	Joe Bourgeois	
234	Teresa Stradley	
235	Judy and Norman Owsley	
236	Tim McCauley	
237	Jim Potter	
238	Adolf Gundersen	
239	Jean Scialabba	
240	Ralph Morgan	
241	Mark Mico	
242	David L. Jarvis	
243	Kevin Baranowski	
244	John Kelley	
245	Greg Azarian	
246	Jeff Vollmer	
247	Mark Herwig	
248	Frances Topping	
249	Deb Vessels	
250	Jim Pasman	
251	Julie DuPont	Greenway Land Trust of South Eastern Connecticut, Inc.
252	Mark Lafaver	
253	John McGannon	
254	Madeline Jeffery	North Stonington Citizens Land Alliance, Inc.
255	Chivian, Eric Seth	
256	Alan Bostdorf	
257	Jo Michaelson	
258	Kirsten Atchison	
259	Janet Olsen	
260	Robert Tourigny	
261	Stanley Scharf	
262	Betty Perkowski	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
263	Jim Wysocki	
265	Greg Dysart	
266	Eileen Pascouche	
267	Duane I. Schultz	
268	Lexi Henshel	
269	Bruce Howard	
270	Kathy Klemkow	
271	Michael Mieszczak	
272	Leighton A. Price	
273	Peter Ellis	
274	Lane Laboda	
275	Mathew Webber	
276	Stacy Giacchi	
277	Robert Fehsinger	
278	Cynthia Ellis	
279	Dawn Fine	
280	Chris Wood	Oblong Land Conservancy
281	Gregory Bump	
282	Mike and Loretta Taylor	
283	Kate Harvey	
284	Lois Post	
285	Caroline Chapin	
286	Anne St. George	
287	John Deery	
288	Dorothy Price	
289	Raymond Mendez	Brittany Capital Group, Inc.
290	Carty, Clair	
291	Judy Herkimer	Housatonic Environmental Action League, Inc. (HEAL)
292	Marissa Theve	
293	Diana Price	
294	James Johnson	
295	Paul Johnson	Carver Sportsmen's Club, Inc.
296	Jerry Bearden	
297	David Williams	Brookline Bird Club
298	Gay Myers	
299	Daniel Mullins	Eastern Connecticut Conservation District
300	William Humm	
301	P. Tremblay	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
302	Erik Kiviat	Hudsonia Ltd.
303	David Kuritzky	
304	Zack Klyver	
305	Eric Affuso	
306	Thomas Kilian	
307	Barbara Bates	
308	Doug Schwartz	New England Antiquities Research Association
309	Anthony Pascale	
310	Carrie van der Laan	
311	Constance Watrous	
312	James Haggett	Dutchess/Putnam Appalachian Trail Management Committee
313	Richard D. Bradley	
314	Lindsay Michel	
315	David Gardner	
316	Wayne Miller	
317	Jeff Saltzman	
318	Russell Robbins	Town of Falmouth, Massachusetts: Conservation Commission
319	Kenneth Teixeira	Barnstable County League of Sportsman's Clubs
320	Stephen MacAvery	Dutchess County Environmental Management Council
321	Joseph Nadeau	
322	Deanne Noiseux	
323	Edmund Lamb	
324	Perry Masotti	
325	Donna O'Connell-Gilmore	
326	Paul Kinnaly	
327	Linda Taivalantti	
328	Frank Lehman	
329	David Dow	
330	Howard Hoople	Massachusetts Butterfly Club
331	Alli Shurtleff	
332	Louise Fabrykiewicz	
333	Jane A. Desforges	
334	Donna Mazzamurro	
335	Chrissy Adamowicz	
336	Aileen Briggs	
337	Jeff Wallace	
338	Bill Freeman	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
339	Anne Huibregtse	
340	Jesse St. Andre	
341	Evan	
342	David L. Lersch	Connecticut Chapter of Delta Waterfowl
343	Martha and Donald Parker	
344	Carolyn Baker-Reck	
345	Robert Askins	
346	Charlie Bridges	
347	Marlaine Bernier	
348	Barbara Butler	
349	Terence Miller	
350	William D. Saums	
351	John Boyce	
352	John J. Clarke	Audubon Society, Massachusetts
353	Representative Aundre Bumgardner	State of Connecticut, House of Representatives
354	Joseph Falconeiri	
356	Joanne Bergren	
357	Cliff Vanover	
358	Troy Allen	
359	Larry Olsen	
360	Bruce Conroy	Nutmeg State Council of Sportsmen
361	Hampton Watkins	
362	Ruth Platner	
363	Thomas Jannke	
364	Paul Phillips	
365	Jean Jerbert	
366	Sara P. Devin	
367	Karen Seward	
368	Lee Pulis	
369	Matthew Sisk, Deputy Commissioner	Massachusetts Department of Conservation and Recreation
370	Joshua Clements	
371	Clare Rogers	
372	Harvey Buford	Town of Hopkinton, Rhode Island: Conservation Commission and Town Council
373	Erin Fahey	
374	Darrel Feasel	

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375	Gerar Gold	
376	Marcus J. Molinaro	Dutchess County New York
377	Barbara Volkle and Steve Moore	
378	Heather Goldstone	WGBH Radio; WCAI Radio
379	Matt Leahy	Society for the Protection of New Hampshire Forests
380	Contance DuHamel	
381	C.D. Clarke	
382	Ken Goldsmith	
383	Laurie Cellucci	
384	Stephen and Tracy Fischer	
385	Gordon Allen	
386	Irene Schultz	
387	Lisa Ryan	
388	Jared Pendak	
389	Bo Zaremba	
390	David Brown	
391	Mark Chipkin	
392	Mary O'Connor	
393	Gibbons Cornwell	
394	Joan McKibben	Town of Litchfield, Connecticut: Conservation Commission
395	Robert J. Newman	
396	Marie Goe-Olson	
397	Leslie Sanford	
398	Maria Nichols	
399	Ann Howe	
400	Tim Spahr	
401	Audrey Tyrka	
402	Terri Cogbill	
403	Kathryn Chihowski	
404	Garry Gordon	
405	Henry Anderson	
407	Tim Abbott and Michael Jastremski	Housatonic Valley Association
408	Syma Ebbin	Groton Open Space Association
409	Tin Smith	
410	Mariel Todd	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
411	David Frantz	
412	Virginia Evangelista	
413	Heidi Mattos	
414	Peter Picone	
415	Genese Leach	Audubon Society Connecticut and New York
416	Karen Kalmar	
417	Denise Stowell	
418	NA	
419	Mary Hosmer	
420	Thomas Lipsky	
421	Haynes Miller	
424	Cathy Mason	
426	William Ricker	Town of North Stonington, Connecticut: Conservation Commission
427	Laurie Giannotti	Connecticut State Parks Trails & Greenways Program
428	Evan Schulman	Tidemarth Farms
429	James Utter	Friends of the Great Swamp (FROGS)
430	Tom Andersen	Audubon Society, Connecticut
431	Katie Beth Ryan	
432	Scott Comings	The Nature Conservancy
433	Caryn Stankewich	
434	Linda Benezra	Plymouth Area League of Women Voters
435	Kate Johnson	
436	NA	
437	Sonja Ahlberg	
438	Diana McNamara	
439	Barbara Volkle and Steve Moore	Nuttall Ornithological Club
440	Susan O'Reilly	
441	David Bjorkman	
442	Janice Robertson	
443	NA	
444	Amy Usowski	Town of Harwich, Massachusetts: Conservation Department
445	George Kaye	Town of North East, New York
446	Karen Schneller-McDonald	
447	Andy Weik	Ruffed Grouse Society; American Woodcock Society
448	Daniel Bierman	
449	Love Albrecht Howard	The Six Ponds Improvement Association
450	Edward DeWitt	Association to Preserve Cape Cod

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
451	Chris Prill	Dover Union Free School District
452	Karen Lutz	Appalachian Trail Conservancy
453	Kevin Smith	Town of Londonderry, New Hampshire
454	Sharl Heller and Love Albrecht Howard	Southeastern Massachusetts Pine Barrens Alliance
455	Ken Hegle	
456	David Reagon	Amenia Conservation Advisory Commission
457	Rozlyn Krajcik	
458	Becky (no last name given)	Bay State Trail Riders Association
459	Robert Harrington	
460	Eric Johnson	
461	Christine LaManna	
462	Velvet Sartori	
463	Arnold Devine	
464	Eric Heller	
465	Brendan Stevens	
466	Michael Marelli	Town of Ledyard, Connecticut
467	Mark Salvo – Petition A	Defenders of Wildlife
468	John Cronin	
469	Linda Deegan	
470	Bill Durkin	The Friends of Rachel Carson NWR
471	Dorie Stolley	
472	Evelyn and Joseph Chiarito	
473	Jasen Stock	New Hampshire Timberland Owners Association
474	Friends Of Watrous Farm	Friends of the Watrous Farm LLC
475	Peg Arguimbau	Sharon, Massachusetts Conservation Commission
476	David Harbison	Massachusetts Sportsmen’s Council
477	Eric Fiegenbaum	Town of Madbury, New Hampshire: Conservation Commission
478	Russell Shay	Land Trust Alliance
479	Randy	
480	Patricia Riexinger, Director	Division of Fish, Wildlife and Marine Resources, New York State Department of Environmental Conservation
481	Glenn Normandeau, Executive Director	New Hampshire Fish and Game Department
482	Steve Williams, President	Wildlife Management Institute
483	Bill Hyatt, Chief	Connecticut Department of Energy and Environmental Protection, Bureau of Natural Resources
484	Stanton Sim	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
485	Kathleen M. Van Der Aue, President	Connecticut Ornithological Association
486	Arthur R. Ganz, President	Salt Ponds Coalition
487	Anne H. Nalwalk	
488	Jane Giegler	
489	Jim Dugan	The World Peace Sanctuary
490	Fred and Sarah Contrata	
491	Patty Daley, Deputy Director	Cape Cod Commission
492	Hope Brayton	
493	Anonymous	
494	Tim Lloyd	
495	Susan Joseph	Ralph T. Waterman Bird Club, Inc.
496	Irene Caldwell	
497	Cheryl Fischer	
498	F. Thomas Fudala	Mashpee Town Planner, Chairman of Mashpee Water District Commission, Friends of Mashpee NWR Board member
499	Jo Ann Muramoto	Member of The 300 Committee Land Trust Board of Directors
500	Jackie Dietrich	
501	Betsy Hall	Town of Plymouth, Massachusetts: Open Space Committee
502	Randy and Barbara Fleming	
504	Robin Reed	Maine Historic Preservation Commission
505	Russell Shay	The Land Trust Alliance
506	Stuart Santoro	
507	Janice Parker	
519	George Kaye	Town of North East, New York: Supervisor
520	Ann Howe	
521	Laurie Cellucci	
524	Shawn O'Sullivan	
525	Ben Baldwin	
526	Barbara Howell	
527	Chris Prill	Dover Schools
528	Chris Wood	Oblong Land Conservancy
529	Donna Mazzamurro	
530	Mathew Denecour	
531	John Hammond	
532	John Parsons	
535	Cortney Worrall	National Parks Conservation Association
536	Miles Chapin	

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Letter #	Commenter Name	Commenter Affiliation (If Applicable)
538	Chris Prill	Dover Schools
539	Stancy DuHamel	
540	Ned Gerber	
541	Paul Whitcomb	
542	Peter M. Barres	
543	Richard Lieberman	
544	Armend T	
545	Jack Buckley, Director	Massachusetts Division of Fisheries and Wildlife
546	Frank and Sarah Geer	
6078	Form Letter	Initiated by National Audubon Society

* Note: The ID number was assigned automatically by our database. Numbering starts at 1. Any other missing numbers represent letters that were removed from the database because they were either duplicates, or did not contain comments. In addition, names of those that submitted comments via a form letter (5,523 individuals submitted versions of National Audubon letter; all are referenced as ID# 6078) or petition (2,455 individual signed petition from Defenders of Wildlife; all are referenced as ID# 467) are not included separately in this table.

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