

Appendix 0



Patrick Comins

Immature bald eagle

Service's Response to Public Comments on the Silvio O. Conte National Fish and Wildlife Refuge Draft CCP/EIS

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Introduction

In August 2015 the U.S. Fish and Wildlife Service (Service, USFWS, FWS, we, our) released for public review the draft comprehensive conservation plan and environmental impact statement (draft CCP/EIS) for Silvio O. Conte National Fish and Wildlife Refuge (NFWR, refuge). The draft CCP/EIS outlined four alternatives for managing the refuge. Alternative C was identified as the “Service-preferred alternative.”

We released the draft CCP/EIS for 90 days of public review and comment from August 18 to November 16, 2015. During the comment period we hosted 14 public information meetings in towns across the Connecticut River watershed (watershed) and four public hearings; one in each of the four States in the watershed. We evaluated all the letters and e-mails sent to us during the comment period, along with comments recorded at our public hearings. This document summarizes all of the substantive comments we received and provides our responses to them.

Based on our analysis in the draft CCP/EIS and our evaluation of those comments, we have modified alternative C, which remains our preferred alternative in the final CCP/EIS. Our modifications include additions, corrections, clarifications and changes to our preferred management action (see table O.1). We have also determined that none of those modifications warrants our publishing a revised or amended draft before publishing the final CCP/EIS.

Summary of Comments Received

We received over 360 correspondences from over 300 separate commenters, including Federal and State agencies, local municipalities and town committees, organizations, and individuals. These comments came in the form of postings on the website *regulations.gov*, or were provided as oral testimony at public hearings. We also received one petition with over 2,546 signatures. From these written and oral submissions, we distinguished over 1,770 individual comments.

The diversity of sources who share comments is displayed on the following list. The numbers in parentheses represent the unique identifier we assigned for each commenter (Also, see table O.2 on page O-94). Some agencies or organizations have multiple numbers listed because different individuals representing those agencies or organizations provided comments.

- Ashuelot River Local Advisory Committee, New Hampshire (ARLAC) (279)
- Board of Governors of Unified Towns and Gores, Vermont (237)
- Chesterfield Select Board, Massachusetts (188)
- Columbia Planning Board, New Hampshire (71)
- Connecticut Department of Energy and Environmental Protection (CTDEEP; 180)
- Connecticut River Gateway Commission (303; 313)
- Environmental Protection Agency (301)
- Granby Board of Selectmen, Connecticut (30)
- Jefferson Conservation Commission, New Hampshire (213)
- Mascoma River Local Advisory Committee (MRLAC), New Hampshire (79)
- Massachusetts Department of Conservation and Recreation (MDCR; 278)
- National Park Service (NPS; 189; 241)
- New Hampshire Department of Resources and Economic Development, Parks and Recreation, Bureau of Trails (NH DRED; 127)
- Town of Alstead Board of Selectmen, New Hampshire (261)
- Town of Bloomfield, Connecticut (133)
- Town of Brighton Selectboard, Vermont (91)
- Town of Canaan, New Hampshire (271)
- Town of Columbia, Board of Selectmen, New Hampshire (67; 294)
- Town of Marlow, Board of Selectmen, New Hampshire (300)
- Town of Montague, Massachusetts (234)
- Town of Randolph Conservation Commission, NH (182)
- Town of Simsbury Conservation Commission, Connecticut (316)
- Two Rivers-Ottawaquechee Regional Commission (TRORC), Vermont (139)
- U.S. Forest Service (USFS; 306)
- Vermont Fish and Wildlife Department (VFWD; 252)
- Vermont Representative, Paul Lefebvre (197)
- West Fairlee Center Conservation Commission, Vermont (176)
- Winchester Conservation Commission, Vermont (269)
- Windham Regional Commission, Vermont (66)

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

- Appalachian Mountain Club (297)
- Audubon Connecticut (90; 120)
- Audubon Society of New Hampshire (122)
- Biocitizens School of Environmental Philosophy (147)
- Canaan Conservation Commission, New Hampshire (78)
- Center for Biological Diversity (215)
- Champion Lands Leaseholders and Traditional Interests Association (CLLTIA; 167)
- Connecticut Chapter of Delta Waterfowl Foundation (200)
- Connecticut Land Conservation Council (243)
- Connecticut River Joint Commissions Headwaters Subcommittee (38)
- Connecticut River Joint Commissions Mt. Ascutney Subcommittee (39)
- Connecticut River Joint Commissions Riverbend Subcommittee (40)
- Connecticut River Joint Commissions Upper Valley Subcommittee (41)
- Connecticut River Watershed Council (CRWC; 102; 119; 257)
- Delta Waterfowl (107)
- Friends of Connecticut River Paddlers' Trail (250)
- Friends of Pondicherry (135)
- Friends of Silvio O. Conte Refuge (Friends of Conte Refuge; 210)
- Granite State Division of the Society of American Foresters (72)
- Great Meadows Conservation Trust, Inc. (272)
- Green Mountain Animal Defenders (170)
- Hanover Conservancy (88)
- Kestrel Land Trust (101)
- Kestrel Land Trust Advisory Council (175)
- Lower Farmington River and Salmon Brook Wild and Scenic Study Committee (259)
- Massachusetts Audubon Society (Mass Audubon; 83; 174)
- Massachusetts Forest and Park Friends Network (149)
- Mattabeseck Audubon Society (99)
- Middlesex Land Trust, Inc. (315)
- New England Forestry Foundation (NEFF; 3)
- New Hampshire Association of Conservation Districts (238)
- New Hampshire Farm Bureau Federation (172)
- New Hampshire Timberland Owners Association (NHTOA; 244; 293)
- Northern Forest Canoe Trail (242)
- Park Watershed (246)
- Protect Our Wildlife (124)
- Protect Our Wildlife Vermont; The Humane Society of the United States (125)
- Putney Mountain Association (217)
- Safari Club International (152)
- Salmon River Watershed Partnership (317)
- Sierra Club, Massachusetts Chapter (68)
- Society for the Protection of New Hampshire Forests (SPNHF; 196)
- The Connecticut Yankee Conservation Project (184)
- The Eightmile River Wild & Scenic Coordinating Committee (162)
- The Farmington River Watershed Association (117)
- The Haddam Neck Spirit (221)
- The Nature Conservancy (TNC; 160; 183; 245)
- The Nature Conservancy, New Hampshire Chapter (220)
- The Windmill Hill Pinnacle Association (267)
- Trustee of Bliss Lane Realty Trust and Bear Hill Conservancy Trust (264)
- Upper Valley Trails Alliance (153)
- Vermont Association of Snow Travelers, Inc. (VAST; 31; 298)
- Vermont Chapter of the Sierra Club (233)
- Vermont Federation of Sportsmen's Clubs (58)
- Vermont Forest Products Association (32)
- Vermont Humane Federation (140)
- Vermont River Conservancy; Friends of Connecticut River Paddlers' Trail (251)
- Vermont Traditions Coalition (223)
- Vermont Trappers Association (47; 48)

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

- Durgin and Crowell Lumber Co. (226)
- Ecological Connections (198)
- Ennead Architects AIA (59)
- G. H. Evarts & Co., Inc. (114)
- Graystone Landing Tree Farm (73)
- Green Mountain Forestry LLC (143)
- Green Woodlands (137)
- HPP Inc. (103)
- King Forest Industries, Inc. (181)
- Precision Lumber, Inc. (263)
- Wagner Forest Management, Ltd. (87)

We have prepared table O.1 which reflects the primary issues identified during the comment period and indicates if and how our preferred alternative changed as a result of our review of the comments and information provided. This table is followed by a detailed summary of the comments and our responses.

Table O.1. Highlights of Changes between Silvio O. Conte NFWR Draft and Final CCP/EIS under the Service-preferred Alternative C			
Topic	Proposal under Alternative C in Draft CCP/EIS	Proposal under Alternative C in Final CCP/EIS	Where in Document to Reference Change
Conservation Partnership Areas (CPAs)	<ul style="list-style-type: none"> Identified 17 CPAs across the watershed to strategically locate where Refuge staff would support partners' conservation efforts. 	<p>Change:</p> <ul style="list-style-type: none"> Added 2 new CPAs (e.g. total of 19 CPAs). Increased 5 CPAs. Reduced 1 CPA. 	Chapter 4, description of alternative C, and Appendix C—Land Protection Plan (LPP).
Conservation Focus Areas (CFAs) (e.g. proposed refuge acquisition areas)	<ul style="list-style-type: none"> Identified 22 CFAs across the watershed to define where the Service is seeking to expand the refuge's acquisition authority in support of priority conservation objectives. CFAs establish discrete, definable refuge land acquisition areas, where we will work with willing sellers only. <p>Proposed refuge expansion: 99,466</p>	<p>Change:</p> <ul style="list-style-type: none"> Updated maps and acreages to account for refuge acquisitions since 2013, and to reflect updated conservation land base (TNC 2014). Increased one CFA, and Salmon Brook CFA (Connecticut) was replaced by Muddy Brook CFA (Connecticut). <p>Proposed refuge expansion: 99,507</p>	Chapter 4, description of alternative C, and Appendix C.
Land Acquisition Process	<ul style="list-style-type: none"> Continue Service policy to only acquire an interest in land (fee or easement) from willing sellers when there is an agreement on terms and price, and funding is available, or from owners wanting to donate land. We will not use eminent domain to acquire land. Private landowner retains all private rights if they do not want to sell; or, they can sell to whomever they choose. 	<p>Change:</p> <ul style="list-style-type: none"> Included proposal to acquire 90% of acreage, on average, in CFAs, and 10% in surrounding CPAs consistent with criteria identified in proposed LPP. Total acquisition authority increased by 41 acres as noted above. 	Appendix C.
Relationship to <i>Connect the Connecticut</i> (CTC) Landscape Conservation Design	<ul style="list-style-type: none"> The CTC collaborative partnership landscape conservation design project was in development when draft plan was published. CTC goal is to work with partners, identify priority areas for conserving ecosystems and species in the watershed, and implement strategies to sustain them. 	<p>Change:</p> <ul style="list-style-type: none"> Included results of final CTC into proposed LPP for the refuge. Added example of how CFAs overlay with the final CTC priority core and connector areas. 	Appendix C.
Priority Public Uses	<ul style="list-style-type: none"> Continue existing priority public uses. Priority public uses are supported on all refuge divisions. Pre-acquisition CDs will continue to allow priority public uses to continue where they occurred prior to acquisition. 	<p>No Change:</p> <ul style="list-style-type: none"> Continued to allow priority public uses on newly acquired lands where it was already occurring and found compatible. We plan to complete detailed step-down plans (e.g. Hunting and Fishing Plans). 	Appendix D—Findings of Appropriateness (FOAs) and Compatibility Determinations (CDs).
Other Public Uses	<ul style="list-style-type: none"> Trapping will continue on Nulhegan Basin Division. Proposal to eliminate two miles of snowmobile trail on Nulhegan Basin Division. Allow bicycling on open refuge roads on Nulhegan Basin Division. No mention of recreational drone use. 	<p>Change:</p> <ul style="list-style-type: none"> Propose to eliminate only one mile of snowmobile trail, and keep one mile of a critical trail link on Nulhegan Basin Division. Determined the use of recreational drones is not appropriate. 	Appendix D.
Habitat Management	<ul style="list-style-type: none"> Step-down habitat management plans (HMPs) will provide details on specific management actions. Appendix A provides habitat objectives and identifies focal species and habitats by CFA. 	<p>No Change:</p> <ul style="list-style-type: none"> Further emphasized that development of each division-specific HMP will follow a National Environmental Policy Act (NEPA) compliant process, including public involvement. 	Chapter 4, goal 1, and Appendix A—Resources Overview and Management Direction for Conservation Focus Areas and Refuge Units.

In the discussions 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 identification (ID) numbers. Table O.2 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 draft CCP/EIS and indicate how the final CCP/EIS was changed in response to comments. The full versions of both the draft CCP/EIS and the final CCP/EIS are available online at:

http://www.fws.gov/refuge/Silvio_O_Conte/what_we_do/conservation.html (accessed December 2016).

You may view hard copies or obtain copies on CD-ROM of the final CCP/EIS by contacting staff at either of the refuge offices below:

Silvio O. Conte NFWR Headquarters
103 E. Plumtree Road
Sunderland, MA 01375
Phone: 413-548-8002
Fax: 413-548-9725

Silvio O. Conte NFWR, Nulhegan Basin Division Office and Visitor Contact Station
5396 Rte. 105
Brunswick, Vermont 05905
Phone: 802-962-5240
Fax: 802-962-5006

Service's Response to Comments by Subject

General Comments (*not specific to proposed alternatives*) (ID#s 13, 20, 29, 38, 45, 51, 53, 59, 60, 61, 68, 75, 76, 83, 85, 92, 99, 100, 102, 106, 107, 117, 119, 122, 130, 131, 132, 135, 139, 149, 151, 152, 176, 180, 183, 189, 195, 196, 210, 220, 225, 230, 243, 246, 250, 251, 252, 257, 265, 269, 277, 286, 289, 297, 301, 303, 306, 308, 309, 313, 314, 315)

Miscellaneous General Statements

Comment: Some commenters mention the great strides in improving water quality in the watershed over the past 60 years and express the importance of maintaining it. One commenter mentions that when she was a child "...you used to see the dyes pouring down the river from the paper factories...we couldn't eat the fish because they were covered with sores or cankers. You never swam in the river...Now I can boat...and fish... and scuba dive." Some attribute the improvements to increased land conservation, including the contributions of Conte Refuge, while others believe those improvements pre-date the refuge. One person states, "... a lot of it [improved water quality] is due to legislation that was passed long before the Silvio O. Conte ever arrived and a lot of it has to do with private landowners doing what's right in conjunction with better education brought by such groups as NRCS and State agencies. It has nothing to do with the Feds outside the Clean Water Act."

Response: We concur that sustaining clean water in the watershed is an essential component of protecting natural resources and recreational opportunities in the region. Due to the size and extent of the watershed, the work to maintain water quality involves many Federal and State agencies, private landowners, and non-governmental organizations within the watershed. No one entity has enough

resources, or owns enough land, to affect significant change alone. It is only by working cooperatively can additional improvements continue. The Service, through Conte Refuge and other programs, is working hard to facilitate and contribute to that cooperation and continued accomplishments through partnerships such as those with the States, NRCS, other Federal agencies, private landowners, and a myriad of others identified in appendix N.

Comment: We heard from commenters who appreciate national wildlife refuges and the role they play nationally and regionally in conserving species and habitat. One individual states, "I think of our refuges as banks. These are the places where every single American owns a piece of the land. And, we should be happy we are "saving" for future generations what would be quickly lost if we didn't put the habitat and the species first and our human needs second."

Others express support for Conte Refuge specifically, and the work the staff have been doing. The benefits the refuge provides by protecting natural resources, including those threatened by climate change, protecting cultural resources and viewsheds, and supporting traditional public recreation are mentioned. One individual expresses, "I enthusiastically support the Conte Refuge and the excellent work the USFWS has been doing to assemble property for conservation. The Connecticut River watershed extends through 4 States and beyond, and only a Federal agency can provide the perspective and resources necessary to pursue this ambitious and far-sighted endeavor." Another says, "The concept of a landscape-scale wildlife refuge provides a secure future for flora, fauna, and people as well." The CRWC states, "CRWC supports the Conte refuge as a concept and as an on-the-ground reality. Over the years since its founding, CWRC has seen the positive impacts of the refuge and those impacts on the river, the watershed, and the species that depend on the river."

Response: We appreciate the acknowledgement that the network of national wildlife refuges are an important national resource with many conservation, cultural, and recreational resource values to be enjoyed by present and future generations of the American public. The Conte Refuge staff work hard to make a significant contribution to that national network, and to the regional landscape that comprises the watershed.

Comment: Some commenters recognize the extensive effort involved in developing the draft CCP/EIS. One person states, "The scope and scale of this planning effort is remarkable, and USFWS has produced an excellent draft CCP." Another writes, "I was impressed by the amount of information available to the reader about the watershed, the refuge, and the constraints and opportunities afforded the U.S. Fish and Wildlife Service to be a significant contributor to the health and vitality of the Connecticut River Watershed." Others express general support for the draft plans four stated goals. One person states, "Regarding the four goals, they are well-founded." Another states, "All of these goals are important to our region and the larger Connecticut River watershed." Mass Audubon states they are "...committed to working independently and with its many partners to support the goals of the CCP, while recognizing the need for increased public support and funding for the many actions proposed in the plan." The Audubon Society of New Hampshire states, "The unique mission, scope, and extent of the Conte NWR present distinct challenges for planning and management alike. We believe that the draft CCP/EIS meets those challenges admirably."

Response: We appreciate the recognition that the draft CCP/EIS was a significant undertaking and that readers found the document informative and complete.

Comment: Some people identify typographical errors, recommend minor changes to text, note factual errors, or request clarifications for the final CCP/EIS. An example of a minor change to text is Audubon Society of New Hampshire's suggestion that we slightly revise the first sentence in our vision statement to read "... diverse aquatic and terrestrial plant and animal life...". They also recommend listing a few different bird species in chapter 3 in our descriptions of what birds are associated with particular habitat types. Another individual suggests we change the term "woody debris" to "woody material", or "woody habitat." An example of a factual error was brought to our attention by the National Park Service who noted we did not identify correctly the number of National Natural Landmarks in the watershed.

Response: All typographical errors brought to our attention have been corrected in the final CCP/EIS. Any of the suggested text changes and recommendations for clarifications were also made in the final plan if they are consistent with our proposal and did not alter our management intent. We also fixed the factual errors brought to our attention. None of the text changes or factual error corrections affected our analysis or conclusions in the final plan.

Planning Process (ID#s 1, 4, 24, 31, 32, 35, 39, 42, 53, 62, 72, 81, 82, 94, 103, 109, 113, 119, 123, 129, 141, 156, 157, 161, 166, 167, 172, 178, 180, 202, 214, 222, 223, 232, 237, 238, 239, 250, 252, 260, 261, 280, 293, 300, 305) (also see "Socioeconomic Impacts" discussion)

Public Involvement

Comment: Some commenters criticize that the Service did not engage local communities and their elected officials, or affected landowners, user groups, and other stakeholders, during the planning process. They suggest that we start the planning process over with fuller engagement. One commenter expressed, "I am personally outraged that this initiative is being rushed through without full disclosure and input from the people who live in the communities most greatly affected by this proposed expansion." Another commenter states, "Poor stakeholder outreach...has hurt the transparency and credibility of this planning process."

Response: We understand the concerns expressed that we did not reach out to every individual or organization that is affected or may be interested in our proposal. However, in our experience with these types of proposals, despite early outreach in the planning process (e.g. scoping), we usually receive little interest to engage in the process from the public until we have a draft plan to present.

Chapter 6 in the draft and final plans details the consultations and coordination we conducted during the planning process. We initiated our planning process with an October 2006 notice in the *Federal Register* and by sending email notifications out to over 1,000 people, municipalities, agencies, and organizations announcing the launch of our planning process. In addition, we hosted 25 public scoping meetings in 2007 and 2008, which were advertised in local media throughout the watershed. At those scoping meetings, we encouraged people to contact us if there were questions or concerns about the planning process, or to share an idea or recommendation.

We also made a concerted effort to announce the release our draft plan for a 90-day public comment period, and to advertise our 14 public meetings and 4 public hearings. A *Federal Register* notice was published in July 2015 announcing the availability of the draft plan for public comment. In addition, over 600 media outlets were contacted via email, and emails were sent to municipalities across the watershed and to all contacts on our mailing list. Many local organizations are represented on that mailing list, who in turn, reached out to their memberships. We also notified by mail over 3,000 affected property owners within our proposed CFAs. We sent a full set of the draft CCP/EIS documents to 34 towns within proposed CFAs and made personal calls to let them know of the comment period and upcoming public meetings. In addition, at the request of Senator Shaheen and Senator Ayotte, two additional public meetings were organized by the Senators in New Hampshire after the comment period closed to facilitate dialogue and the continued sharing of information about the refuge.

Each outreach method included Service contact information, and people were encouraged to contact Service staff to discuss the draft plan or planning process. The extent of our outreach on the draft plan exceeds that required by Service policy (Re: Service National Environmental Policy Act (NEPA) handbook at https://www.fws.gov/r9esnepa/NEPA_HANDBOOK2.pdf; accessed August 2016) and NEPA regulations. The Council on Environmental Quality (CEQ) regulations under NEPA (40 CFR 1506.10) require a minimum of 45 days for public review and comment on draft EISs. Our comment period was double that duration.

Finally, we state in chapter 4, under "Actions Common to All, Refuge Step-Down Plans" that further stepdown planning, including development of habitat management, visitors services, and hunting and fishing plans for each CFA would be developed if CFAs are approved. Those subsequent planning

documents will follow a NEPA compliant process, including State agency, local community, and partner involvement.

Comment: We received comments that given the general nature of most goals and objectives in this plan, partners and other stakeholders should be consulted when creating the more detailed stepdown plans and preparing for implementation.

Response: We encourage involvement in our planning processes. As noted in our response directly above, as we develop stepdown plans, we will follow a NEPA compliant process, including State agency, local community, and partner involvement. The stepdown plans will provide more specific detail on the tools, techniques, and the location of management units.

Comment: Some commenters requested an extension of the 90-day public comment period, or request a new comment period be initiated. Once commenter states, "Given the length of the document and its analysis, the stakeholders did not have sufficient time to fully evaluate it and formulate comments...this was especially problematic for a number of town governments who meet on a periodic basis."

Response: We considered these requests when it was suggested during the comment period. However, as indicated in the response above, we felt that the 90-day comment period, which represents double the required comment period, coupled with the notifications, and the 14 public meetings and 4 public hearings we hosted in communities across the watershed, was adequate. In addition, we participated in 2 public meetings mentioned in our response above, organized by Senator Shaheen and Senator Ayotte in New Hampshire, were in response to requests from local elected officials and stakeholders providing an additional opportunity to listen to stakeholders.

We also wish to point out that we organized the document by geography, and provide an online version that was readily searchable. Those features we specifically incorporated to allow reviewers to save time and focus on what they deem most important.

Comment: Some commenters express concern about accepting comments on the draft plan from individuals and organizations who do not live and work in the area, or do not have experience or expertise in the topics they comment on. One commenter states, "If someone is not familiar with the land, then their comments should not be relevant to the planning process and decisions made about that land..." Another individual states, "The planning process allows for a lot of people to weigh in and comment on forest practices that don't know anything about logging and forestry, They don't know what they are talking about, don't have the education, expertise, or experience, yet they can affect what forest management gets done. They have the potential to impact good forest management practices." Further, one commenter is concerned about who will make the final decision. They state, "The decision should be left to the people in the local area. They know best how to manage their area...People in the local area should have more influence on the decisions..."

Response: We concur that the opinions of local stakeholders are very important, and we recognize they may be most directly impacted by our proposal. However, it is important to recognize that there are diverse opinions on land protection and management within communities in our proposal. We encourage commenters to read the comments we received, and the wide-ranging opinions expressed from respective geographic areas of interest, which are posted on our website at: https://www.fws.gov/refuge/Silvio_O_Conte/what_we_do/conservation.html (accessed August 2016). In many towns, we received both support for, and opposition to, our proposal. While local engagement is critical to our success, it is also important to recognize that national wildlife refuges are a national resource for the American people, all of whom are also stakeholders and deserve to be heard as well. Further, as we note in our response above, we will be engaged in extensive stepdown planning within individual CFAs should our proposal be approved. Many of those plans, such as habitat management, hunting and fishing, and visitor services plans, would include additional public involvement and are more site-specific.

Comment: Two people expressed frustration that they attempted to contact the Service during the public comment period on the draft plan and that emails and/or phone calls were not returned.

Response: We apologize for any contacts that were not responded to; however, we believe this is an exception. We made it a high priority to be available and responsive during the public comment period in 2015. Over 40 phone calls were returned, mostly to landowners interested in potentially selling their land should the plan be approved. A number of other calls were to stakeholders interested in more details on our public use proposals or our plans for forest management. In one case, the commenter left a voicemail giving a town office number to return the call to. We returned that call, but apparently the receptionist at the town office never passed along the message that we had called back. This was an unfortunate miscommunication.

Comment: Some commenters express the opinion that the planning process was a waste of taxpayer's money. Others state that they oppose all alternatives and we should start planning over and include all stakeholders.

Response: The development of CCPs is required for all national wildlife refuges by law and Service policy. Specifically, the 1997 Refuge Improvement Act states that “. . . the Secretary shall -- (i) propose a comprehensive conservation plan for each refuge or related complex of refuges . . . in the System; (ii) publish a notice of opportunity for public comment in the *Federal Register* on each proposed conservation plan; (iii) issue a final conservation plan for each planning unit consistent with the provisions of this Act and, to the extent practicable, consistent with fish and wildlife conservation plans of the State in which the refuge is located; and (iv) not less frequently than 15 years after the date of issuance of a conservation plan under clause (iii) and every 15 years thereafter, revise the conservation plan as may be necessary.” This law provides additional detail on conservation planning for the Refuge System. Service refuge planning policy (602 FW 1, 602 FW 3) provides additional details on how to implement this law (<https://www.fws.gov/policy/manuals/part.cfm?series=600&seriestitle=LAND%20USE%20AND%20MANAGEMENT%20SERIES>; accessed September 2016). Refuge Planning policy (602 FW3) requires compliance with NEPA.

New Alternative

Comment: There were commenters supporting a new alternative that would include management of existing properties only.

Response: In our draft and final plans, in chapter 4 in the section titled “Alternatives or Actions Considered by Eliminated from Detailed Study”, we describe consideration of an alternative titled, “No additional refuge acquisition by the Service; partners would assume all future land protection.” We refer you to that section for the full discussion, however, our conclusion presented there is,

“In summary, we believe that eliminating the option of any further land acquisition from willing sellers for the refuge would be inconsistent with the legislative mandate in the Conte Refuge Act, significantly affect our ability to meet refuge purposes, and break commitments made in the 1995 FEIS to play a significant role in the watershed's conservation partnership.”

Comment: One commenter suggests that we consider an alternative that incorporates the concept of Conservation Partnership Areas (CPAs) and Conservation Focus Areas (CFAs) under current acquisition authority.

Response: The alternative described in the comment, working within our current acquisition authority and incorporating the concepts of CPAs and CFAs, is represented by alternative B. Chapter 4 of the draft and final CCP/EIS describes this in the section “Detailed Description of the Alternatives” in the description of alternative B.

Stepdown Plans

Comment: Commenters expressed concern with our ability to complete subsequent stepdown plans given extensive costs and time associated with Federal NEPA requirements. A commenter suggests that this may be a reason to leave proposed actions in private stewardship. Other commenters feel that, when we do initiate stepdown planning, we need to engage local communities, partners, and affected landowners in those efforts. When planning is complete, we look forward to engaging in partnerships to implement these programs to benefit the most people over time.

Response: We appreciate the concern as to whether we will have funding and staffing levels to complete stepdown plans; it is an ambitious schedule. Our highest priority will be to complete our habitat management, hunting, and fishing stepdown plans by refuge division. We will look for efficiencies where possible. Each of those plans would require a NEPA compliant process, which would include State agency, local community, and partner involvement.

Laws, Policies, Mandates (ID#s 4, 32, 45, 46, 53, 58, 82, 118, 123, 155, 167, 200, 223, 231, 237, 252, 260, 261, 299, 312)
(also see "Hunting", "Fishing" and "Trapping" discussions)

Federal Lands, Firearms, Access

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 and managing land for the refuge, we will comply with all applicable laws and regulations.

Comment: One commenter emphasized the importance for managing native fish in the watershed as these resources are expressly enumerated in the law authorizing the refuge, the Conte Refuge Act.

Response: We concur that native fish are a critical resource and a priority for Conte Refuge. Their importance to the watershed is the reason the refuge is designated a "National Fish and Wildlife Refuge", one of only three in the Refuge System. We detail their importance to our current and future management in goal 4, under objective 4.3 – Aquatic Species Protection, Restoration, and Management.

Comment: Several organizations, agencies, and individuals suggest that in order to maintain consistency across a State, we should allow hunting and fishing as per State regulations with no additional refuge-specific regulations. A few commenters suggest that not doing so has "...led to a strong undercurrent of distrust of the federal government..." Some note that the Green Mountain National Forest follows this practice of consistency with Vermont State regulations and it helps ensure uniform laws across the State. Another commenter States that in some instances, our hunting regulations should be more conservative in order to preserve wildlife resources.

One commenter notes that in addition to adding confusion, refuge-specific regulations would "fly in the face of the State Fish and Wildlife professionals by suggesting that their methods are something less." Another commenter suggests that State fish and wildlife agencies use, "...hunting and trapping to control carrying capacity—those are management tool—and I would hate to see a situation where hunting or trapping was eliminated from the arsenal of tools that our wildlife managers in the state have at their disposal."

Response: We generally follow State fish and wildlife regulations for hunting and fishing on Conte Refuge lands and we plan to continue that practice. We work closely with our counterparts in each of the four State fish and wildlife agencies and value their knowledge and experience. We take any variations from respective State regulations seriously, and in those few situations where we are more restrictive, we differ

from the State for reasons related to public or environmental health and safety (e.g., not allowing shooting on roads presently open to vehicular travel, or in safety zones around popular hiking trails), or species conservation considerations (e.g., no access to avoid trampling where federally listed plants occur), or to implement Federal regulations that apply to all refuge lands (e.g., the prohibition on the possession of alcohol while hunting). In order to inform refuge-specific rules, we publish our refuge specific regulations annually in the *Federal Register*, and on Nulhegan Basin Division, we make available a brochure that covers allowed uses ranging from snowmobiling and boating to fishing and hunting. Our experience with implementing a hunting program at the Nulhegan Basin Division is that hunters return year after year, are very familiar with the refuge-specific regulations, and do not feel any inconvenience in following them.

Comment: The CLLTIA and others request that we rescind a regulation banning shooting from roads; that such an opportunity is especially important to accommodate older and mobility-impaired hunters, and that such activity has been allowed on adjoining State lands without an accident. VFWD states this is inconsistent with State law, which only restricts shooting on and near public highways. They recommend we remove this restriction.

Response: We have a responsibility to provide for public safety on refuge lands and ensure that visitors comply with safety requirements (50 CFR 25.71, and as such, may choose to support activities in a way that differs from our State partners. We maintain that shooting from, along, or across roads open to vehicular travel represents a safety issue. We encourage people to use these roads for vehicle, pedestrian, and bicycle access. While the refuge roads are not public highways, they are roads that are owned and maintained to provide access for a variety of permitted and encouraged public uses. It is for these reasons we do not allow shooting from, along, or across refuge roads.

We note in the final plan our intention is to allow bicycling on refuge roads also open to motor vehicles. However, we agree with the importance of considering the access needs of those who are mobility-impaired. That said, the Nulhegan Basin Division contains in excess of 20 miles of “winter” roads, grass roads, and skid trails related to former logging activities. These roads are gated and closed to vehicular travel and represent relatively level ground that should provide a similar form of walking accessibility as a gravel road. Our preferred alternative C proposes the continued maintenance of vegetation along the most promising segments of woods roads (mowing 1 mile annually) specifically to enhance seasonal access.

Comment: The Vermont Federation of Sportsmen's Clubs states that we should “maintain outdoors sporting activities as a “priority public use” as established by the 1997 National Wildlife Refuge (System) Improvement Act.”

Response: The Refuge Improvement Act lists hunting, fishing, photography, wildlife observation, environmental education, and interpretation, as wildlife-dependent priority public uses for the Refuge System. These uses are, by definition, appropriate uses of a national wildlife refuge. However, actual implementation is dependent upon a compatibility determination to ensure that the activity does not conflict with the purposes for which the refuge was established.

In the context of this comment, we assume “maintaining outdoors sporting activities as priority public uses” applies to hunting and fishing. We currently provide a wide range of hunting and fishing opportunities on refuge lands – and our proposal would likewise promote these activities on future acquisitions, pending a positive compatibility finding. In chapter 4, in the section titled “Actions Common to All Alternatives”, in the discussion under Service-preferred alternative C for goal 3 objectives 3.1 and 3.2, and in appendix D compatibility determinations, we describe our existing hunting and fishing programs. It is our intent to allow these activities to occur, where compatible, consistent with State regulations.

Comment: Several individuals share the same comment that weapons should be allowed on the refuge at all times.

Response: Based on a 2009 Federal law, firearms are allowed on refuge lands consistent with the respective State's laws. They are not, however, allowed in Federal facilities.

Partnerships (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings) (ID#s 37, 83, 90, 101, 117, 119, 122, 136, 139, 153, 176, 180, 189, 200, 210, 220, 245, 250, 251, 259, 264, 267, 279, 281, 298, 303, 313, 315, 317)

Support

Comment: We received many comments from individuals and organizations supporting our partnership approach to conserving natural and cultural resources in the watershed. One commenter captures what others said, "We will need effective and robust partnerships to ensure that this watershed remains a special place to live, work, and recreate within." Another commenter mentions the importance of partnerships to "...leverage the resources of many other public and private entities." Commenters expressed the importance of Conte Refuge as a conservation partner in the watershed because staff bring a Federal presence and can help coordinate, leverage, and streamline support by other Federal partners, especially USDA. Numerous suggestions were made for new partnerships to either protect a geographic area, to support an existing organization, or to support programs or initiatives. One commenter suggests we focus our efforts on connecting with established local community partnerships, naming the King Arthur partnership, instead of creating new ones (e.g. Friends Groups), that cost time and money. Many of our current partners expressed their continued support.

Response: In the final CCP EIS chapter 1, we describe the history of establishing the refuge, including the recognition that the key to success in conserving natural resources in the watershed will only be attained through partnerships. We appreciate the support and suggestions for enhancing our partnerships throughout the watershed. The importance of those relationships is such a priority for our planning document that we developed goal 4 to highlight their significance. Goal 4 is detailed in chapter 4 under the section "Actions Common to Alternatives B, C, and D Only." Eleven objectives under goal 4 detail our priority actions. The encompassing goal statement is,

"Enhance the conservation, protection, and stewardship of natural and cultural resources, and promote wildlife-dependent recreation, throughout the Connecticut River watershed by initiating, supporting, and promoting partnerships with other Federal, State, and local agencies, Tribal governments, and private organizations."

We have reviewed the specific suggestions for partnerships and will be reaching out to those entities that are consistent with our refuge purposes, mission, and goals, and giving priority to those that are active within our CPAs. We identify those we have worked with in appendix N.

We agree that an important role we can serve is to facilitate, leverage, and streamline Federal agency cooperation and support for conservation action in the watershed. We do not assume the Service will have a lead role in all conservation activities. Rather, we would look to support our partner activities in CPAs and would offer our expertise where it would be most effective and efficient.

While a commenter suggests Friends Groups may not be necessary, we describe the vital role that they play in chapter 4 under goal 4. In particular, the Friends of Conte is an association of over 70 local, State, and national organizations from the conservation, education, recreation, and sustainable economic sectors. Their primary purpose is to provide a forum, foundation, and framework to promote partnerships.

Comment: Several comments wrote us in support for regional water- and land based trail initiatives and opportunities; however, there was a request for more detailed information in how Refuge staff will support these initiatives.

Response: We recognize that we do not provide a lot of detail on how we would support specific regional trail initiatives. In part, that is due to our assumption that new regional trails may be developed in the future and we wanted our management direction to generally cover that possibility. In chapter 4 of the draft and final plans, in the section on "Actions Common to Alternatives B, C, and D," goal 3, objective 3.4, we describe our support for water-based and terrestrial-based regional trail initiatives. Under both the water- and terrestrial-based trail initiatives, we state,

"Work with partners and willing landowners to support compatible trail initiatives within the Connecticut River watershed that promote a conservation/land ethic and quality outdoor experiences for people of all abilities."

With regard to water-based trails, we identify actions such as working with partners to establish campsites and launches, and using the refuge website and other outreach efforts to promote trails and associated opportunities. The Connecticut River Paddlers Trail and the Northern Forest Canoe Trail are specifically mentioned. With terrestrial-based trails, we identify actions to assist in the long-term protection of trail continuity and quality by working with existing or prospective conservation owners to maintain trail and habitat connectivity. We would also support outreach efforts, including through our refuge website. The Appalachian National Scenic Trail and New England National Scenic Trail are specifically mentioned. Our support of these trail initiatives is not limited by what we describe in the final CCP/EIS. We encourage partners to identify other opportunities and look forward to working on those ideas.

Volunteer Programs

Comment: We received comments on the importance of, and the need for increased support of, a volunteer program.

Response: We recognize the importance of a robust volunteer program in chapter 4 of the draft and final plans, under the section, "Actions Common to All Alternatives." In that section, we describe the program's significance as follows,

"Assistance by volunteers is recognized as key to successful management of public lands and vital to implementation of refuge programs, plans, and projects, especially in times of declining budgets. Working with volunteers builds personal and community relationships, and promotes a shared stewardship of refuges and their associated natural and cultural resources to be treasured and enjoyed by both present and future generations."

We will continue to support volunteers as a priority commensurate with our ability to adequately fund and coordinate a safe and meaningful program.

Community Relations/Outreach (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 66, 82, 119, 122, 167, 176, 180, 210, 223, 230, 237)

General

Comment: We received comments related to the importance of including community leaders and planners in the implementation of landscape scale conservation, as planned by the refuge. One commenter notes the importance of sharing science to inform local decision-making. Other commenters express the need for the Service to reach out and engage all 396 watershed communities, not only those in CPAs, to ensure successful

implementation of the Conte Refuge Plan and the landscape conservation design developed by the *Connect the Connecticut* partnership.

Response: In a previous response under “Planning Process”, we noted the concerted effort we made to reach stakeholders, including town officials and community leaders, in the watershed when we had a draft plan out for review. We summarize in chapter 6 of the final CCP/EIS the consultation and coordination we conducted during the plan’s development. However, we recognize that we probably did not reach everyone that may have an interest in what we propose.

The advantage of having a final plan is that it serves as a communications tool to engage others in conservation. We will use the final plan to work with watershed communities on a landscape scale to develop and cooperate in implementation strategies, and to share tools and information to support local decision-making.

In the past we have held annual coordination meetings in towns where refuge lands are administered. Once the CCP is completed, we plan to resume those meetings. Further, as we have indicated in several responses above, as we develop stepdown plans, we will engage the State, communities, and other stakeholders.

Urban Refuge Initiative – General (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 60, 90, 142, 246, 315) (see also “Environmental Education, Interpretation” discussion)

General

Comment: Commenters note that with so much of our population living in urban and suburban areas, the conservation of natural areas in cities provides a critical link for people to experience the natural world and that this can translate into an appreciation for larger rural landscapes. Natural landscapes help people de-stress, provide insights into nature and can even spur interest in the conservation profession. Some urban areas specifically mentioned, where a more robust presence is desired from the refuge, is in Hartford and Middletown, Connecticut; Springfield/Chicopee, Holyoke, and Northampton, Massachusetts; Brattleboro, Vermont; and, Hanover, New Hampshire. Commenters suggest that our guidance relative to community development can help meet our CCP regional habitat conservation goals.

Audubon Connecticut points out the importance of urban areas within the Northeast to migrant songbirds. They note that parks and neighborhood areas are often the only available stopover habitat for long-distance migrants. They believe the Conte Refuge is uniquely suited to work with municipal and non-governmental partners to improve such stopover habitats and advocate for the warranted funding allocations to complete this work.

Park Watershed (Connecticut) is eager to collaborate with us to support urban neighborhoods through programs such as the Service’s Urban Wildlife Refuge Partnerships. They note specifically that Hartford’s North End Federal Promise Zone and the area surrounding Coltsville National Historic Park would benefit greatly from our technical guidance. Desired input could include landscape planning and urban design, stream connectivity, and recreational trail access. They suggest developing a network of municipal and local non-profit personnel who share an interest in supporting urban conservation goals. They also suggest we form an urban-suburban “friends” task force to develop relevant strategies in this environment.

Another commenter suggests we support an EPA Urban Waters Federal Partnership encompassing the Hartford-Holyoke region, in an effort to increase the use of Federal resources to accomplish shared environmental goals within this urbanized area. Such an action would allow us to integrate our conservation priorities into major development projects in the region.

Response: Connecting urban and suburban audiences with nature is a major initiative of the Service, which we describe in chapter 4, under "Actions Common to All Alternatives." Conte Refuge current activities are described there.

Our next formal urban refuge project will be in Hartford, Connecticut to support the Urban Bird Partnership. A business plan for the Springfield Urban Wildlife Refuge Partnership is in development which stresses connecting Hartford to Holyoke.

We are interested in the Park Watershed's ideas for future collaborations and welcome a meeting with them. We also encourage other suggestions for other urban partnerships, and in particular, ways we can leverage our limited resources among a local partner base.

At present, we are employing our Watershed on Wheels (WoW) Express, which is a mobile visitors center that allows us to go anywhere in the watershed and engage people. Further, we have established Conte Corners in key locations in the watershed and we anticipate there will be more, pending funding and available host locations. In 2017, we plan to launch our Biological Assessment Trailer (BAT) Express, which will serve as a mobile lab to augment our work with schools and support our Adopt-A-Habitat program.

Private Landowner Outreach (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 38, 41, 180)

General

Comment: The CRJC Upper Valley Subcommittee would like to see the USFWS and USDA assist landowners with habitat improvement programs in a more streamlined, simplified manner that is watershed-wide and focused on CPAs. The subcommittee further notes that technical assistance to those interested in protecting or improving habitat in CPAs should be available to all landowners, not just conservation partners, which is echoed by the CRJC Headwaters Subcommittee.

Response: In the final CCP EIS chapter 4, under goal 4, we describe a private lands coordination program to facilitate private landowner assistance among all four States, Federal agencies, and conservation organizations who are working with private landowners to protect and manage fish and wildlife habitat. We agree with this sentiment and our practice has been to work with all partners, including private landowners, organizations, States, and municipalities. We have a dedicated refuge position to serve that program and assist with connecting landowners with voluntary incentive programs such as those provided by the USDA and/or to leverage Federal grants and funding to support work on private lands. We are not partial to traditional conservation partners and would like to emphasize our geographic focus in the CPAs.

Comment: CTDEEP requests that the Refuge's private lands staff work with their Watershed, Lakes, and Nonpoint Source Program staff to proactively provide municipalities information about potential impacts of regulations and land use proposals on priority refuge species and habitats. In addition to land acquisition, CTDEEP strongly suggests that the Service collaborate with CTDEEP, UCONN Cooperative Extension System and other conservation partners on delivering technical assistance to private land owners and municipalities to raise awareness of key species and habitats, improve regulatory controls, and facilitate local action.

Response: We describe the broad intent of our private lands program in chapter 4, under goal 4, objective 4.1. Our intent is to bridge gaps in capacity, while avoiding any redundancy with existing efforts by our partners. We would be happy to work with CTDEEP program staff to ensure redundancy does not happen. We certainly want to avoid any confusion on the part of landowners.

Our policy is not to influence local land use regulations. Rather, it is our preference to offer resource information and alternative actions that achieve our desired conservation outcomes. We will also encourage private and municipal landowners to seek other voluntary landowner incentive programs like easements, leases, etc.

Federal Land Ownership (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 1, 4, 18, 32, 35, 37, 38, 39, 40, 43, 46, 47, 51, 53, 54, 59, 62, 66, 70, 73, 77, 81, 82, 83, 87, 89, 94, 99, 100, 101, 113, 114, 119, 120, 123, 127, 128, 131, 134, 139, 141, 143, 144, 145, 155, 157, 167, 172, 176, 180, 181, 183, 196, 197, 199, 205, 210, 214, 215, 220, 222, 223, 226, 229, 232, 236, 237, 239, 244, 257, 260, 261, 262, 263, 266, 267, 268, 271, 275, 277, 292, 293, 294, 296, 299, 303, 308, 313, 315) (see also "Agriculture and Forest Working Lands" and "Socioeconomic Impacts" discussions)

Opposition

Comment: We received comments from individuals, town officials, and organizations stating they did not support the Service or the Federal Government. Commenters expressed concerns that the Federal Government would not represent or enact the local perspective, and that private, local ownership and stewardship is best. Some stated if Federal land acquisition is inescapable, State and local concurrence should be required before acquisition takes place. Other commenters suggested that local land trusts and private land ownership provide ample and varied opportunities for land protection, noting private management is more accountable and able to make conservation progress than the Service. One individual expressed the need for enhanced funding for counties to influence the Federal land use decisions to align with the desires of the local/State residents and agencies. The NHTOA, Board of Selectmen for the Town of Columbia, New Hampshire and other commenters simply expressed their opposition to any proposed Federal ownership or expansion of Conte Refuge. Some commenters use the term "land grab" to describe this proposal and generally view the CCP/EIS as a "taking by the government from the people."

Response: The 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 U.S. 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 or expand, a national wildlife refuge, including the Refuge Recreation Act of 1962, as amended (16 U.S.C. 460), the National Wildlife Refuge Administration Act of 1966 (16 U.S.C. 668dd), 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). Funding for refuge acquisition is obtained from the Land and Water Conservation Fund, or the Migratory Bird Act fund, and is specific to the purpose of land acquisition. Those funds cannot be used, for example, to manage a refuge, to build infrastructure, or to hire new staff.

We enumerate many times in the draft and final plans our commitment that the Service would only acquire land from willing sellers. Lands within the approved refuge 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, if at all. 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 until, or unless, they decide to convey those rights to the Service in fee or easement.

The 1995 EIS approved 65 Special Focus areas ranging from 15 to 22,000 acres. One-third of them were under 100 acres. In this plan, we propose moving away from the 1995 concept of small scattered sites due

to the complexities, expense, and inefficiencies in having ownership disperse. Appendix C, and chapter 4, in the section, "Actions Common to Alternatives B, C, and D Only", describes our rationale in more detail as to why that strategy is not effective or efficient. Conservation Focus Areas (CFAs) are our attempt to consolidate ownership into more ecologically and administratively meaningful boundaries.

Comment: Commenters expressed dismay at pursuing Federal land acquisition given the current Federal deficit, and noted current mismanagement is a predictor of poor administration of any potential future acquisitions. Several commenters voiced concerns for a current lack of effective and efficient active management on refuge lands, that "it seems that there is no management planned." They posited this would "result in a decrease in wildlife populations of deer, moose, rabbits, bear, songbirds, raptors and many others," along with increased wildfire occurrences. Some commenters noted that the acquisition of more, smaller parcels would exacerbate existing management challenges.

CRWC and others noted that funding for land acquisition could be better used elsewhere. Recommendations include environmental education programs, educational outreach to private landowners, programs "that work with rural communities to support the service economy," direct reallocation to local conservation commissions, existing Service management and program costs, conservation easements, the Forest Legacy Program, and other land protection tools. Several individuals state that costs associated with land acquisition exacerbate the Federal deficit.

Response: The most effective way to permanently achieve conservation is to protect the land. Ownership fragmentation is the precursor to habitat fragmentation. The former causes problems for working farms, working forests, and wildlife habitat. Therefore, actions that protect wildlife habitat as well as working farms and forests are vitally important within this large working landscape.

The authority to create and expand refuges comes from statutory authorities including the Refuge Recreation Act of 1962, as amended (16 U.S.C. 460), the National Wildlife Refuge Administration Act of 1966 (16 U.S.C. 668dd), 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).

We understand there are differing opinions on whether, where, or how much, the Federal Government should continue to protect habitat for wildlife and people. However, we believe that ceasing all future efforts to acquire lands for the refuge to permanently protect Federal trust resources and provide for wildlife-dependent recreation, would not accomplish the legislative purposes for the Refuge. We describe in chapter 4, under "Actions and Alternatives Eliminated from Detailed Study" additional rationale for that position.

As noted in our response above, we do not believe the 1995 plan to acquire small scattered parcels for the refuge is effective or efficient, and therefore, we have proposed larger, contiguous CFAs. Our proposal is detailed in the final CCP/EIS, appendix C. That being said, land conservation on a landscape basis is similar to assembling a puzzle in collaboration with many partners. There are many small pieces to arrange and it is a long-term commitment, especially when only working with willing sellers. It is true that refuge ownership may still result in disjunct parcels, although this is not the long-term design. We would also look to assembling a meaningful management unit with adjacent conservation landowners. We acknowledge that smaller, disjunct parcels are typically more expensive to manage.

As for refuge land acquisition funding, it is specific for that purpose and cannot be used for any other management purposes. For example, those funds cannot be used to manage a refuge, to build infrastructure, or to hire new staff. Funding for land acquisition for the refuge primarily comes from the Land and Water Conservation Fund (LWCF) which was set aside by Congress 50 years ago specifically to replenish public lands and waters. LWCF funds are used to purchase leases, easements, and fee owned land. These funds are used by Department of Interior and Agriculture agencies. It is not a grant program or education program. Another source of land acquisition funding is the Migratory Bird Treaty Act funds.

Like the States and municipal governments, if the Federal Government uses public funds for land protection purposes, they need to acquire an interest in that property that is equal in value to the amount invested.

Finally, the purpose and intent with developing a final CCP/EIS is to engage the public in a process that, when final, results in a plan that informs where and how we plan to work, and what goals and objectives direct that work. Given the geographic scale of this project, we recognize that many of our proposals are broad in scope. As we have noted in previous responses, we will develop stepdown plans following a NEPA compliant process, which would include State agency, local community, and partner involvement.

Comment: We received comments from many individuals who felt eminent domain is a threat and should not be an available tool to the Service. One commenter cites examples of eminent domain use by the State of Vermont for routing of utility corridors and pipelines and associated impacts to nearby landowners. Some individuals request the Service explicitly state we will not use eminent domain in the CCP/EIS. Another commenter cites a lack of communication with residents owning land within the “acquisition map” and implies that this is connected to potential future use of eminent domain. One individual comments that the CCP/EIS offers “no regulatory protection from hostile acquisition of their homesteads.”

Response: While the Service technically has the authority to use eminent domain, it is Service policy not to use it and it has not been used for over four decades. We have no intention of acquiring any landowner's property against their will. We purchase land from willing sellers only at market value. We have more opportunities to acquire lands from willing sellers than there are funds available to use.

Comment: Some commenters voiced concerns that historical, recreational, and traditional uses would be restricted on newly acquired lands (including restrictions on trail access, hunting, fishing, snowmobiling, ATV use, etc.). In a similar vein, another commenter noted that “federal ownership results in lots of new rules and regulations being imposed that people don't anticipate or appreciate what the impact will be.” One commenter stated that “if any protected species are discovered hunting and/or fishing can be discontinued.” Organizations associated with VTC oppose additional land purchases “if they carry prohibitions above and beyond Vermont law, reduced trails, gated roads, reduced timber management, and local disfavor.”

Response: While ATV use will not be allowed on refuge lands (as described in appendix D under a “Finding of Appropriateness”), we have supported continued snowmobile use on State recognized trails. As far as traditional uses such as hunting and fishing go, where they occurred prior to our purchase, we are continuing them consistent with the Refuge Improvement Act of 1997. Areas that were not open to hunting, fishing, and other public access and uses, will need to wait until we prepare a formal opening package in consultation with the States, communities, and other stakeholders as part of a publicly vetted process consistent with NEPA.

Comment: We received comments from individuals who did not see a need to expand the Silvio O. Conte Refuge. One individual did not recognize “any imminent threat for you guys to keep buying more land to preserve the water quality.” Some commenters referenced State laws already protecting threatened and endangered species, wildlife habitats, and water quality; noting a lack of need for any further protection. The NHTOA and other individuals cite local conservation easement programs and private land ownership as superior to Federal management for land protection, sustainable timber management, and wildlife management.

Response: Our intent is to complement States' efforts to protect important resources such as those noted in the comment. Using land acquisition as a tool, we intend to protect these important habitats to assure ownership fragmentation does not eventually lead to habitat fragmentation. While water quality benefits are an incidental benefit to habitat protection, it is not the primary reason we are employing this as a tool. Ownership fragmentation impacts the resiliency of wildlife habitat in much the same manner it impacts a working forest or a working farm. We agree that voluntary incentive programs protecting working farms and forests are also a way to conserve wildlife and habitats. We will encourage landowners to pursue these

voluntary programs and utilize Service resources elsewhere, as we would consider those areas already conserved.

Comment: We received comments from individuals who were concerned with social justice impacts as the Federal Government buys land. Some noted that the Federal land appraisal process inflates land values and prices locals out of their ability to compete as buyers.

Response: The Service is required by law to acquire lands at market value. Market value is established within a Federal yellow book appraisal prepared by a private, independent certified appraiser who is knowledgeable of the local market. The value is based on recent comparable sales of like property in the area. The Service does not set the opinion of value—the appraiser does. The appraisal is then reviewed by an entirely separate Federal agency for consistency with Federal appraisal standards as well as whether or not the opinion of value is adequately supported within the appraisal report. Please refer to “Socioeconomic Impacts” for further discussion.

Comment: Some commenters voiced concerns about communication and timing during the land acquisition process. While some lamented the lack of outreach to landowners regarding land acquisition, others stated that any communication going out to “property owners asking if they would be willing to sell their property... is not right.” One commenter characterized the appraisal process as non-transparent, citing the heavily redacted nature of his copy of the land appraisal as evidence. The NHTOA noted inappropriate timing of acquisition of the Mascoma parcels, and commented that “initiating these real estate transactions in conservation focus areas prior to receiving public comment has hurt the transparency and credibility of this planning process.” They further request that “the USFWS must reinstate the Silvio Conte planning and public comment process.”

Response: The Mascoma River Easement was purchased using existing authorities established in 1995. In an effort to be transparent, the Service coordinated with the State, the community, and the abutting property owners. The State and the community sent letters of support for the purchase of the Mascoma River Easement.

Comment: Commenters note the need for State, local, and community approval of any additional Federal land purchases. For example, the CLLTIA specifically suggests that future acquisitions should be “agreeable” to the State of Vermont and the host community given local tax implications. The group also states that they would evaluate future refuge land acquisitions on a case-by-case basis.

Response: Planning processes, such as the development of this CCP/EIS and Land Protection Plan provide State agencies, partners, and the public the opportunity to review and comment on proposed refuge land acquisition. Securing approval for land acquisition involves a public process, compliance with NEPA, and an opportunity to evaluate the entire proposal, instead of by a piecemeal approach. We involve all stakeholders in that process, including municipalities, States, etc. Once we have an approved land protection plan, it can be implemented as soon as willing sellers and funding is available. Because State agencies are partners with special status under law and policy, we often consult with them prior to acquisition to discuss the acquisition.

The proper point for general public engagement in the process is at the broadest level – such as offering comment on our proposed Land Protection Plan which accompanied this CCP/EIS. Out of respect, and the need, for the confidentiality of potential sellers, we also make a practice of informing municipal governments of pending acquisitions only after we have reached agreement with sellers in matters of terms and price.

Support

Comment: We received comments from individuals expressing general support for Federal land acquisition to protect these lands for future generations, particularly in the face of increasing development. Some reported that they view the expansion of the Refuge as “responsible stewardship that protects and maintains the intact

functioning of the Connecticut River Watershed ecosystems for the benefit of wildlife and humanity, now and into the future.”

One anonymous individual expressed their support, and further requested each of the deeds to future land acquisitions include permanent conservation restriction language. This would ensure these parcels could not be developed or sold by the government.

Response: The Service thanks you for your support. The Service will not purchase and essentially extinguish value in the property without just compensation to the American public. Should property ever become excess to the needs of any Federal agency, there is an established process for disposal. Once land becomes part of the NWRS, it is protected in perpetuity. It would take an act of Congress to dispose of NWR land—unless we had decided to do an exchange. In this case, it is Service policy to exchange dollar for dollar, and for equal or greater wildlife benefits. If this approach is employed, it must be done with interested stakeholders and vetted publicly, consistent with NEPA. At a minimum, an Environmental Assessment would need to be completed.

Comment: Commenters expressed support for increasing refuge area for the conservation of large landscapes to protect natural processes, wildlife corridors, and provide protection from climate change impacts. CTDEEP Bureau of Water Protection and Land Protection Planning and Standards Division further supports additional land protection for clean water and hydrologic watershed functions, throughout the watershed and especially in headwater regions and along riparian corridors. One commenter notes these efforts are consistent with policies contained in the 2014 TRORC Regional Plan.

One individual noted that the addition of Federal land for recreation will help relieve some of the overuse of other Federal lands in the area.

Another individual states the need for large protected areas where biodiversity and resilience is top priority is greater than ever, given the increasing severity of many “symptoms of human domination of the natural world.” The Center for Biological Diversity also supports the protection of large block of older forest to provide greater flexibility in adapting to climate and other landscape changes within a watershed context. Wildlife such as migrating fish and bird species, reptiles, and amphibians were cited as particular beneficiaries of large contiguous land protection.

Response: Your comment is noted.

Comment: We received comments in support of acquiring more lands, based in the desire for maintained or enhanced public accessibility and engagement. One commenter noted that none of the units in Connecticut are places that people can visit, and recommends future acquisitions include areas for public access with interpretive signage.

Response: We agree. As the Service acquires a manageable land base where we can provide public access opportunities and facilities, we will develop a detailed Visitor Services Plan that will be vetted publicly in compliance with NEPA.

Comment: We received a comment from a family expressing enthusiasm at the discovery of their lands included within the area outlined in alternative B. They recognize that inclusion in this area “in no way implies we have agreed to limit our property rights, but rather recognizes the particular conservation value of this area. We would be pleased to help identify the particular lots in question to maintain the accuracy of CCP mapping.”

Response: Your comment is noted.

Comment: Commenters expressed appreciation for the emphasis on “willing-seller only” policy described in the draft CCP/EIS. Several of these comments explained how this policy works, stating “this is not a Federal land grab,” and citing the “extensive track record of the Refuge System as a whole... eminent domain has been

used in very, very few instances...at the request of the landowner who has sought to do it in order to clear title or dissolve discrepancies in price.”

Several other commenters also noted the importance of having willing buyers, which gives private landowners the opportunity to voluntarily put their land forward.

Response: Your comment is noted.

Comment: Several individuals expressed their support for the expansion of Conte Refuge for its local economic and community benefits, citing increased opportunities for outdoor recreation and tourism in the region and enhanced drinking water quality as examples. One commenter further noted, “It is important 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 in New Hampshire and the health of our citizens.” Another individual from the City of Keene expressed a need to protect our water resources, “because without our water, our City is in trouble.”

Response: Your comment is noted.

Comment: The Connecticut River Gateway Commission urges the Service to remove the statement within draft CCP/EIS Summary, pg. 8, that the Conte Refuge “will not generally seek to acquire lands that are already permanently protected by another conservation agency or organization.” The CRGC supports a policy of flexibility and cooperation among conservation partners, and requests the Service revise the statements precluding a role for local agencies to make it clear that the Conte Refuge will welcome such local collaboration. The Middlesex Land Trust, Inc. further supports this sentiment.

Response: It should be emphasized the previous statement does not preclude the Service from working with partners to acquire land in an effort to meet landowner needs and allow the Service to “catch up.” The intent of this statement is not to restrict the Service’s ability to work with partners who acquire land with the intent to resell to the Service. Given the ability of local land trusts and other conservation organizations to act quickly and meet the needs of the landowner, it is the common practice for the Service to collaborate with other conservation entities to serve as a conduit for Service land acquisition. Protected working farms, working forests, and land conserved by the States and other Federal conservation agencies are considered protected by the Service.

Comment: Commenters expressed the need to prioritize land acquisition over management, particularly in light of expanding population and development pressures. The Center for Biological Diversity asserts that fee-ownership “land acquisition will prove the greatest boon to wildlife and biodiversity...and to people, including and especially the residents of the Connecticut River watershed,” over other forms of land protection where habitat manipulation, single-species focused management, of commercial exploitation such as logging or agriculture remain. The Center further expresses that recreational, health, and economic benefits of public lands are even more valuable given increased human population and development pressures. Another individual states “the goals of the US Fish and Wildlife Service would be best realized if the available funds were deployed for land acquisition.” One commenter noted the shortsighted concern about people’s immediate access and use of the lands, and lamented the lack of concern for long range survival and integrity of lands for centuries onward.

Middlesex Land Trust, Inc. noted an associated benefit of further land acquisition: the reduction of borders of local, State, Federal, and NGO conservations lands which abut private land holdings and resulting enhanced management efficiency. They state, “as a land manager of many small and non-contiguous preserves, our experience is that we spend a significant amount of our resources and organizations focus on addressed boundary issues. The less time all of us spend on that, the more time we can spend on wildlife habitat management and community outreach.”

Response: Your comment is noted. We will pursue land acquisition from willing sellers only as funding and staff time permits.

Comment: We received comments from individuals expressing their support contingent upon the use of conservation easements. An individual commented that conservation easements would be more financially efficient and preserve generation of county and municipal property tax revenue. She further noted, "the ability of the Fish & Wildlife Service and/or local conservation partners to guide and participate in habitat management activities could be provided for in the easement language."

Another commenter cited, "a very recent deal in NH that exemplified how private landowners can have easements acquired by the refuge that maintains property in a working forest." This same commenter stated that "acquisitions focused on easements would be responsive to communities' concerns about how the refuge expands." Another individual states that wildlife populations and habitats can be better managed with easements, purchase of development rights, etc., in addition to expected fee ownership.

One individual noted the CCP aims to protect 65% of parcels through fee ownership and 35% through conservation easements and stated, "in our view, the agency should not be bound by such a fixed ratio. Instead, the agency should use the protection tool that best meets the goals of the Conte Refuge AND the goals of the private landowners with whom the Refuge is working."

Response: The Service plans to use easements as a conservation tool. Project wide, it is estimated this will occur on 35% of acreage. However, it is up to the landowner what interest and how much interest they are willing to sell. Therefore, the 65/35 split may vary due to landowner preference.

Comment: A representative of the CRWC who regularly works with landowners reports enthusiasm by individuals interested in selling their property so it becomes part of a wildlife refuge.

Response: If our approved CCP includes an expanded acquisition boundary, we would be pleased to work with organizations to inform landowners of the Service as an option of many in meeting their conservation needs.

Agricultural and Forest Working Lands Protection – General (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 37, 40, 41, 90, 100, 101, 135, 172, 226, 244, 293)

General

Comment: We had several commenters concerned with impacts to working agricultural lands and potential loss of farmland as a major regional issue. They emphasize the importance of protecting working forests and farmlands to minimize economic losses to local governments and residents. Many were concerned with the Service targeting working farms and forests. Other commenters voiced concerns over the lack of integration with local and community plans for energy and local food production. Another commenter requested that the Service work with MDAR when evaluating and appraising lands for acquisition, and expressed concerns with farmland prices rising because of FWS purchase prices driving inflation.

Response: In the final CCP EIS chapter 4 under section "Actions Common to all Alternatives," we recognize the importance of sustaining working farms and forests. We do not intend to target agricultural 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. We consider lands enrolled in these programs already conserved.

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. Conversion of working farms and forests to other uses has a similar impact on wildlife habitat; the economic and/or ecological value is diminished or lost through the conversion. It is for this reason that the Service actively advocates for the protection of working farms and forests through voluntary incentive programs, for the benefit of wildlife and people.

The Service is required by law to acquire lands at market value. Market value is established within a Federal yellow book appraisal by a private, independent certified appraiser who is knowledgeable of the local market. The value is based on recent comparable sales of like property in the area.

Comment: Connecticut Audubon supports the vision for “Supporting the Working Landscape—Integrating Conservation with Commercial Agricultural and Forest Lands.” They suggest expanding this to encompass opportunities to work with private, municipal, and NGO-owned lands within the watershed, not just those lands associated with commercial agriculture and forestry. This aligns with Audubon’s Working Lands focus and Forests for the Birds programs in Connecticut and Vermont.

Response: Our private lands coordination program encompasses the opportunities you identify. We look forward to complementing our efforts with Audubon’s Working Lands and Forests for the Birds programs.

Integrated Pest and Invasive Plant Species Control – General (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 18, 60, 83, 156)

General

Comment: We received several comments from individuals and organizations on our invasive species program. They express concern of the presence of those species, including Asian bittersweet, water chestnut, and Japanese knotweed, and support refuge management efforts to reduce or eliminate them in partnership with local communities. One commenter suggests that we include white-tailed deer in our invasive management efforts. Another person expressed concern that some of our forest habitat management activities might create openings that could allow invasive species to spread.

Response: We will continue to prioritize and manage invasive species that impact native habitats within the watershed and work with local communities to treat those species beyond refuge ownership. White-tailed deer are not considered an invasive species, but can impact native habitats through overbrowsing. Hunting white-tailed deer would be allowed on refuge lands, consistent with the final compatibility determination and State regulations. We would work with the State if overbrowsing by white-tailed deer was impacting native habitats when appropriate.

With regard to our habitat management practices potentially encouraging the spread of invasive plant species, we respectfully disagree. Our stepdown HMPs include management practices to control for invasive plant species. As we develop our habitat management strategies, we specifically identify measures to avoid favorable conditions for invasive species. Example actions we might employ to reduce infestations include herbicide or mechanical treatments before creating openings, and establishing a monitoring program for detecting their presence.

Refuge Staffing and Visitor Facilities (ID#s 32, 37, 82, 83, 90, 119, 120, 123, 135, 151, 167, 176, 180, 195, 200, 210, 213, 223, 230, 234, 237, 251, 278, 303, 313)

Staffing and Visitor Facilities

Comment: We heard concern about decreasing staffing at the Great Falls Discovery Center in Sunderland, Massachusetts.

Response: We are hopeful that our future funding can support a presence at the Discovery Center. It is unlikely that presence will be permanent, and it will likely be someone whose involvement focuses on developing and implementing programs.

Comment: We heard support for fully staffing education centers, including consideration of partnerships for construction and/or operations of new centers with local organizations.

Response: Our current and future focus in environmental education, interpretation, and outreach is connecting people with nature to get them outside. Instead of indoor facilities, we will be looking toward providing universally accessible birding and nature trails where appropriate on refuge lands, and supporting our partners' outdoor programming. We will support partners' facilities where it is strategic, effective, and efficient for Refuge staff to do so. We do not have plans to build new facilities or dedicate more Refuge staff to existing partner facilities (except as indicated above for Great Falls Discovery Center). Rather, we would like to augment and contribute to our partners programming at their facilities.

We will continue to employ the WoW Express, Conte Corners, the BAT Express, and Adopt-A-Habitat programs as contributions to our partners' efforts in outreach and education activities in the watershed.

Comment: We heard from people who enjoy and appreciate the non-staffed interpretive displays in Conte Corners and in other visitor contact facilities. However, they encourage us to expand our messaging in the exhibits, or as we deliver programs, to include landscape-scale, science-based messages.

Response: We agree that providing a landscape context for conserving resources (e.g. describing relationship and resource connections of Atlantic Coast, to Northeast States, to Connecticut River watershed, to Conte refuge) in our education, interpretation, and outreach is important. We strive to make that point in all our "live" programming. Our current exhibits vary in how well they get that message across. As we develop new exhibits, or upgrade the old ones, this is a message that will be incorporated.

We will continue to consider and explore opportunities to expand our Conte Corners in a way that augments and complements the work of our partners, subject to the availability of funding and a host facility.

Comment: We heard from people who expressed concern about increasing our law enforcement capabilities, noting it was not needed.

Response: We respectfully disagree. Part of providing quality visitor experiences includes safety, visibility, and security. Law enforcement capacity is an integral part of our visitor services program. These officers conduct important outreach on behalf of the Service. In addition to making an annual refuge revenue sharing payment to local municipalities, having our own law enforcement capacity further augments and mitigates our impact on the local municipal services.

Comment: We heard from individuals and organizations who advocate the use of local labor whenever possible.

Response: We try to support local communities and businesses to the extent allowed by our Federal acquisition regulations. As a practical matter, the majority of our purchasing is directed to local businesses for items such as road work, heating fuel, vehicle maintenance, etc., given that such goods and services are most economical to obtain in proximity to the lands and facilities we manage.

Refuge Operating Hours (ID#s 206, 252)

General

Comment: The VFWD requests that we continue to keep refuge lands open to the public during any future Federal Government shutdowns to avoid confusion and frustration on the part of users.

Response: We understand this sentiment. However, direction to close refuges (as well as all Federal lands) during lapses in funding is made by the Administration. We would note that such occurrences are rare, with the most recent shutdown prior to the 2013 event occurring in 1996.

Comment: A commenter opposes the nighttime closure of refuge lands, given that it deprives the public star-gazing opportunities. The person notes that the Mascoma Division contains one of the best dark sky observational areas in the region. They state that a nighttime closure will create a problem that does not exist and make future land acquisitions more difficult.

Response: With the exception of the Nulhegan Basin Division that contains deeded roadway rights-of-way and access to cabin leaseholders both on and off refuge lands, Conte Refuge is open ½ before sunrise to ½ after sunset by regulation. This is established primarily to minimize wildlife disturbance. We encourage people to find these types of opportunities on other public lands or along public points of access, such as municipal and State roads that often transect refuge lands, such as on the Mascoma River Division. We will consider requests for night sky observation on the refuge on a case-by-case basis; contact refuge headquarters for more detailed information.

Environmental Education and Interpretation (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 82, 83, 119, 123, 167, 210, 223, 237, 246, 297)

Support

Comment: Commenters support our environmental education and interpretation efforts. Some suggest expanding programming to increase connections with urban audiences. Others think our efforts should enhance “cultural traditions.”

Response: We will be preparing Visitor Services Plans for each division. That planning process will include the State, stakeholders, and a public involvement and NEPA compliant document. As we indicated in chapter 4, in the section “Actions Common to All Alternatives”, connecting with urban audiences is a priority for us. Through our existing programs and our urban partnerships, we will increase environmental education and interpretation offerings for those audiences. We are not clear what is meant by the commenters mention of “cultural traditions,” however, if related to hunting and fishing, we state our intent to promote these activities in chapter 4, goal 3, objective 3.1 and 3.2.

In 2015, the Springfield (Massachusetts) Urban Wildlife Refuge Partnership was established. We plan to accomplish the same status in Hartford, Connecticut. In 2015 Hartford was designated an Urban Bird Treaty Area, and Springfield followed in 2016. Further, we have Conte Corners in Springfield at the Science Museum, and in East Hartford at Cabelas.

Comment: A commenter suggests we link our educational programming to nationally significant resources within the watershed, such as the Appalachian Trail Conservancy's *Trails to Every Classroom* program.

Response: As we develop our Visitor Services Plans, we will encourage others to identify existing programs that would be appropriate for us to adopt. As appropriate, we would prefer to incorporate those existing, successful programs to creating new ones.

Comment: An organization appreciates the Watershed on Wheels (WoW) Express mobile visitor center and notes its value to Hartford, Connecticut, area summer camps and festivals. They suggest updating the existing WoW Express and building a second unit to highlight “relationships between people and the quality and character of the refuge.” They note the possibility to partner with foundations to fund operation of the WoW Express.

Response: We are pleased with the enthusiasm generated by the WoW Express. While we took a hiatus during 2016 due to a lack of funding, we encourage interested educators to contact us at refuge headquarters to schedule the WoW for 2017. Additionally, we plan to develop a mobile Biological Assessment Trailer (BAT) that would contain sampling equipment in support of field-based environmental education opportunities with schools and summer camps or at partner facilities where there are "adopted" habitats. We do not have intentions of building a second WoW; however, the suggestions above may be accomplished as we update the panels included in our exhibits.

Comment: A commenter suggests we partner with Springfield Armory/Coltsville National Historic Parks to develop exhibits highlighting the relationship of natural resources to the regional culture and economy.

Response: We agree this would be a mutually beneficial endeavor; however, quality interpretive exhibits are expensive and our resources are limited. We hope to enter into further discussions with the National Park Service about shared opportunities. Depending on the availability of staff and funds, we could offer programming to the Armory as well as other partner locations.

Hunting on Refuge (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under the respective headings for each geographic area. Also, trapping is discussed under Furbearer Management)(ID#s 11, 32, 34, 63, 69, 82, 94, 123, 131, 135, 139, 152, 156, 164, 167, 170, 180, 182, 194, 195, 200, 213, 223, 237, 249, 252, 287)

Support

Comment: Several commenters support hunting on refuge lands. Some note that hunting is a cultural experience that has occurred on the land for hundreds of years.

Response: Hunting was among the priority wildlife-dependent activities identified in the 1997 Refuge System Improvement Act and is an important and traditional public use activity on the refuge.

Comment: Commenters recommend we work expeditiously to provide additional hunting opportunities as additional refuge lands are acquired and that hunting should be maintained as a management option for easements.

Response: Our intent is to open future lands to hunting. With regard to easement purchases, while we would advocate for hunting, the landowner would also have an important voice in the ultimate decision. As an example, we were able to acquire the interest necessary to manage public access on land presently administered as an easement on the Mascoma River Division. It is our intent to continue to provide priority public uses in support of the Refuge Improvement Act and consistent with State regulations where compatible.

Comment: CTDEEP suggests we encourage landowners within CPAs and CFAs to allow access for hunting; especially to address area where wildlife populations exceed available habitat and therefore adversely impact forest regeneration and endangered species habitats.

Response: Although we do not envision a formal outreach program that advocates for certain land uses, we will make an effort to discuss the habitat-related benefits of a State regulated hunting program. We also would be interested in discussing this matter in more detail to determine if there is some joint effort between CTDEEP, the refuge, and other partners that could be employed.

Comment: A commenter requests we not limit existing hunting accessibility while conducting studies given that such investigations can be time consuming.

Response: We are not clear exactly to what this comment refers and will assume it relates to the status of hunting on newly acquired refuge lands. Our past practice and future intent is to maintain any existing opportunities via an interim compatibility determination while we prepare a formal hunt opening package.

Comment: A commenter observes that numerous areas exist for outdoor recreation that are not open to hunting and therefore recommends we favor the opening of more areas to hunting in our future compatibility determinations. This individual also notes that large tracts of land along the Connecticut River in Connecticut are closed to hunting and that because of firearms-related safety zones, the presence of homes on adjacent lands can effectively limit the ability to hunt on public lands.

Response: While we have no direct influence or authority over the use of privately held lands or the establishment of safety zones, our intention is to promote hunting on lands we acquire as well as to express the benefits of hunting to those private landowners with whom we discuss land stewardship options.

Opposition

Comment: A commenter notes that as a “wildlife refuge,” wildlife should be protected from human activities such as hunting; that many areas throughout New England are available for hunting.

Response: As previously noted, hunting was identified in the Refuge System Improvement Act as a priority public use of national wildlife refuges. Although identified as such, not all refuges or portions of refuges are open to hunting. In order for a refuge to allow hunting, we must complete an opening package that consists of an environmental assessment, hunt plan, and compatibility determination. Such documentation establishes the rationale and sustainability of a hunt program, and whether the activity would conflict with the wildlife conservation purposes for which the refuge was established. These documents are also subject to public review and comment. We would follow these practices in evaluating hunting opportunities at future refuge divisions and do so in collaboration with the States, stakeholders, and the public.

Fishing on Refuge (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 63, 82, 94, 99, 123, 139, 156, 167, 194, 195, 213, 223, 237, 249, 252)

Support

Comment: Commenters support our proposal to continue to allow fishing on current and future refuge lands. Some elaborate to note fishing should occur as per State regulations with no additional limitations and it is important to allow this traditional use in order to “maintain the respect of neighbors.”

Response: As described in chapter 4, “Actions Common to All Alternatives,” we will continue to evaluate current and future refuge lands for opportunities to provide fishing opportunities. Where found compatible, we will complete all administrative requirements to formally open the unit to fishing. Our intent is to follow State regulations as we have in the past, however; there may be circumstances warranting additional refuge-specific regulations. Given the concern for lead in the environment we are also proposing under all alternatives to encourage the use of nontoxic tackle (chapter 4, “Actions Common to All Alternatives,” page 4-39).

Comment: Commenters support fish stocking in refuge water bodies; some note this enhances the fishing experience and reduces the pressure on native fish.

Response: Navigable water bodies and Great Ponds occurring on refuge lands fall under State jurisdiction. In those areas, the location, amount, species, and timing of fish stocking is not something we control; it is a decision made by State fish and wildlife agencies.

On refuge waters within Service jurisdiction, where an evaluation identified concerns with native fish populations, we will work with State partners to stock native fish species only.

Comment: A commenter suggests collaboration with State fish and wildlife agencies to emphasize the use of native fish of local origin in their stocking program. They note that the stocking of non-native trout is considered by some as the introduction of non-native invasive species that can damage, rather than enhance stream ecosystems. They recommend data recovery to determine the consequences of non-native stocking programs to the fishery.

Response: Please see our response above. In most instances, waters stocked on refuge lands are under the jurisdiction of the State. For those waters within our jurisdiction, we will work with State partners when concerns for native fish populations arise.

Wildlife Observation and Photography, Infrastructure, and Access on Refuge (ID#s 21, 40, 101, 110, 122, 180, 182, 210, 242, 246, 250, 262, 268, 275, 297, 311)

Support

Comment: Commenters voiced their appreciation for visitor opportunities for recreation and wildlife observation and their accompanying support for Refuge expansion. One individual notes that his family travels annually to the Refuge to enjoy hiking and wildlife observation.

Response: Your comment is noted.

Comment: Several individuals and groups expressed their support for increased visitor opportunities and requested further detail on how refuge lands could specifically connect to regional water- and land-based trails, and include paddling and hiking as uses allowed on the refuge. Some noted the importance of establishing trail connections with other local, regional, and State trail networks.

The Northern Forest Canoe Trail felt paddling waterways and access points merited more recognition in the CCP/EIS. Park Watershed recommended the development of a Conte Refuge cultural travel map to help paddlers find safe access to regional historic sites. Audubon Society of New Hampshire suggested the Service collaborate with partners to update and extend the Connecticut River Birding Trail through Massachusetts and Connecticut. Appalachian Mountain Club listed several suggestions for relevant maps and note their willingness to work with the Refuge to develop these materials.

Response: We recognize the importance of providing public use opportunities. We would address these types of uses and connections with regional trail systems as part of our Visitor Services Plan. In chapter 4, goal 3, objective 4 we discuss how we will generally support connections with national and regional trail systems. We plan to develop detailed visitor services stepdown plans which will look at each of the CFAs more specifically in consultation with the States and stakeholders and vetted publicly consistent with NEPA.

Comment: CTDEEP recommends the CCP/EIS include a requirement to consider and use best management techniques to reduce storm water and nonpoint source pollution impacts in any future visitor infrastructure projects associated with new acquisitions.

Response: We recognize the importance of best management techniques to prevent and/or reduce storm water and nonpoint source pollution impacts on water quality. We agree and will abide by all applicable Federal laws and regulations as they pertain to any activity on Refuge lands.

Comment: We received comments from individuals who support the expansion of visitor opportunities, but voice a need to monitor visitation numbers and adjust them as warranted to protect Refuge resources.

Response: We are increasing our monitoring of public access to include type and amount of access. For instance, we use trail counters on our universal access trails as well as snowmobile trails. Our visitor services stepdown plans will include monitoring protocols to more accurately assess visitor use.

Accessibility

Comment: Several commenters expressed appreciation for the Fort River Division ADA-accessible trail, and requested further ADA-accessibility and infrastructure in newly acquired refuge lands. The Town of Randolph Conservation Commission favors designating the stretch of Presidential Rail Trail that runs from Route 115 A in Jefferson to the Airport Road in Whitefield as wheelchair-accessible.

Response: In chapter 4, under goal 3 we identify specific our intent to develop universally accessible trails once a manageable unit has been configured. While we do not own the Presidential Rail trail, we have and will continue to work with partners to improve universal access and connecting people to nature, with priority given to areas within CPAs.

Opposition to Increased Infrastructure/Visitation

Comment: Some commenters suggested public use and recreation should be limited to non-motorized, low development opportunities. These individuals note that impacts to wildlife should be minimized above all else, and that some areas should be closed to public recreation.

Response: Currently, the vast majority of public access is non-motorized and is envisioned to remain that way. Further, the needs of wildlife are paramount. Consistent with the Refuge Improvement Act, all public uses that we permit have been publicly vetted and deemed compatible with our wildlife and habitat protection objectives. Appendix D details what refuge uses will be allowed or prohibited on refuge lands.

In chapter 4, under "Alternative D," we developed an alternative focusing on minimal development and primitive, non-motorized backcountry recreation.

Dog Training (ID#s 11, 32, 82, 94, 123, 124, 167, 223, 237) (also see "Hunting" discussions)

Administration and Support

Comment: The CLTTIA and others request that we rescind a proposal to develop a contact list of individuals engaged in certain hound training and hunting activities. In their opinion, such a proposal is only of marginal value and only adds red tape for users. They suggest that an alternative to a contact list is to use signage as a means to notify houndsmen. In addition, VFWD supports no restrictions on training and hunting with dogs beyond Vermont State regulations and notes that they will work with us to assess any concerns regarding dog training or hunting.

Response: The presence of pursuit hounds in Canada lynx (lynx) natal locations at a time when lynx may be raising their young (e.g. summer), is of concern, as is the potential pursuit of lynx by hounds. Both could constitute "take" under the Endangered Species Act. Maintaining a contact list of these users during this time is proposed as a means of continuing this activity without changing the season or methods, while gaining the ability to contact users should new information related to lynx presence or proximity become available. We do not consider this to constitute a measurable amount of "red tape" since no permit or other application is intended. We are only requesting users names and phone numbers. This could be facilitated by cooperation with the VFWD which has a long-standing relationship with such users, including the issuance of permits to bear houndsmen. The use of signage to notify hunters is viewed as ineffective and impractical given that it is uncertain where such signage could be strategically placed and noticed by all houndsmen.

Comment: The Vermont Bearhound Association advocates that restrictions applied to hounds should be applied equally to all dogs.

Response: Our intention is to address the issue of potential disturbance to lynx in the least impactful way possible. In consultation with the Service's Endangered Species program, it was thought the nature of hound hunting and the start of the training season in June had much greater potential to negatively

impact lynx than those presented by other types of dog hunting activities, or from pet walking. Our proposal is consistent with the Endangered Species Act, while also being responsive to this user group.

Comment: The Vermont Traditions Coalition believes our requirement that hounds be under voice command at all times is unrealistic. They state that while hunters generally have command over their dogs, “hounds have a mind of their own, particularly when they’re engaged in pursuit of game...” The wording of this requirement could be modified to be more realistic.

Response: We corrected sub-objective 3.1a. in appendix A (Nulhegan Basin and Putney Mountain) to read the same as our 50 CFR 32.65 regulation: “We allow the use of retrieving, flushing, pointing, and pursuit dogs; however dogs must be under control as is reasonable and customary for that activity, such as voice command or remote telemetry.” This same language is used in the compatibility determination for hunting in Vermont in appendix D.

Comment: A commenter states that we allow the training of bird dogs and beagles at the Pondicherry Division beginning October 1, which coincides with the start of the hunting season, while New Hampshire regulations allow training year-round on a permit basis. They ask that we consider following New Hampshire State laws for the training of hunting dogs.

Response: Given the relatively large amount of public use at Pondicherry Division for a wide range of wildlife-dependent activities, such as wildlife observation and nature photography, in addition to hunting, we felt the inclusion of an earlier dog training season would not be compatible with the use and enjoyment of other priority public uses. However, as we develop our stepdown plans for this division, we will address this again in the context of a more comprehensive evaluation.

Non-Priority Public Uses Allowed on Refuge (ID#s 16, 21, 31, 32, 51, 60, 64, 82, 91, 94, 123, 127, 139, 167, 183, 210, 223, 236, 237, 252, 254, 284) (also see “Furbearer Management” discussion)

General

Comment: Our discussion of recreational activities beyond our legislated priority public uses (i.e., hunting, fishing, wildlife observation, and photography) generated a wide variety of comments. The VFWD commends our consideration of a range of compatible uses, including hiking, snowshoeing, cross-country skiing, bicycling, and canoeing. Another commenter objects to our “anti-hiking, anti-cross-country skiing tone”. They thought we should express greater tolerance for pedestrian activities and that such users can represent a significant base of support for the refuge’s land acquisition efforts; more so than hunters and anglers.

The CLLTIA and their supporters offer a comment advocating for a continuation of traditional uses as occurred in the past and express opposition to activities that directly conflict with traditional uses, such as hiking trails.

Response: As legislated in the Refuge System Improvement Act, we are compelled to favor the priority, wildlife-dependent uses of hunting, fishing, wildlife observation, and photography wherever such activities do not compromise the purpose for which the refuge was established and is within our means to administer in a safe manner. We therefore have a clear legislated directive to promote these activities and they take precedence over other potential recreational uses. That said, we are interested in enhancing our relevance to the broader public. That is why we are proposing a range of activities that are not all wildlife-dependent when determined to be compatible. In appendix A (by CFA), and appendix D, we detail our proposals for uses such as bicycling, cross-country skiing, snowshoeing, canoeing, snowmobiling, commercial guiding, the collection of berries and other natural products for personal use, and establishing at least one hiking trail in CFAs.

Snowmobiling

Comment: We received a large number of comments on the topic of snowmobiling; a majority from Vermont, and many of these focused on the Nulhegan Basin Division. A common sentiment involved maintaining the long-established 35-mile trail network at the Nulhegan Basin Division, and expanding the network if warranted. Reasons for doing so included: benefits to the local economy and that snowmobiles provide the only means of reasonable access to all but the division's fringes during winter. Snowmobiles can provide wildlife viewing opportunities and access to areas in order to view wildlife tracks in snow.

We also received comments on our proposed change at the Nulhegan Basin Division – to offset any new trail construction to access the refuge's visitor contact station with closure of redundant trails elsewhere. This is addressed more fully in the Nulhegan Basin CFA section below.

Viewing our proposed CCP/EIS more broadly across the landscape, the Vermont Association of Snow Travelers (VAST) shared a desire for the continuity of their trail system on those lands we might acquire as part of our preferred alternative C. They and their supporters also noted that in addition to trails presently occurring on acquired lands, any future refuge acquisitions might also serve as connector trails or trail re-routes involving neighboring private lands in order to maintain overall network connectivity.

Commenters who opposed snowmobiling noted impacts to wildlife, soils and vegetation, air and water quality, as well as noise pollution and impacts to aquatic and terrestrial ecosystems. habitat loss associated with creating new trails, interfering with ever diminishing wildlife travel corridors, damage caused to vegetation, their exhaust, and generating noise levels above the normal forest baseline which are critical to wildlife. They generally supported alternative means of accessing refuge lands during winter, such as snowshoeing or cross-country skiing.

Response: We intend to maintain our proposed action regarding snowmobiling as shown on map 4.42 at Pondicherry Division and map 4.47 at Nulhegan Basin Division - the only change being the retention of the section of Trail 114 proposed for decommissioning in the draft at Nulhegan Basin Division if a new trail to the visitor contact station is constructed. We believe the literature cited in our compatibility determinations (D-171 Pondicherry; D-149) supports this decision. We further describe our future intent in subobjective 3.4b. to evaluate existing snowmobile trails for their appropriateness and compatibility as new lands are acquired. That said, we also acknowledge the desire for pedestrian access during winter (e.g., North Branch Trail opened at Nulhegan Basin Division several years ago and our current proposal to allow pedestrian use of snowmobile trails.) We also describe in subobjective 3.4c. our desire to support snowshoeing and cross-country skiing on newly acquired lands as a means to enhance visitor use and enjoyment of the refuge.

Camping

Comment: One commenter shares their family's enjoyment for camping and primitive camping and would appreciate such opportunities within the Nulhegan region.

The Vermont Fish and Wildlife Department requests clarification regarding the extent of camping proposed for the Nulhegan Basin Division. They suggest that designated camping areas within the remote refuge lands would increase the public's ability to enjoy the refuge, especially because many people are traveling great distances.

Response: Our proposal for camping is limited to a formal site adjacent to the Nulhegan River in support of a request by the Northern Forest Canoe Trail. While we did consider a more extensive camping option, we decided to not pursue it at this time. We agree that such opportunities would expand access to visitors from afar; however, it also represents administrative challenges that may exceed our capacity and it also represents a potential loss of business for private lodging establishments in the Nulhegan Basin Division's general area.

Commercial Guiding Services

Comment: The CLLTIA, Vermont Forest Products Association, and several of their supporters appreciate our proposal to allow commercial guiding for wildlife-dependent activities for their value to the sporting experience.

Response: The comment is noted – and we hope that such activity can add value to a visitor's experience while also contributing to the local economy. We will evaluate commercial guiding activities on a case-by-case basis to ensure compatibility

Bicycling

Comment: We received support for our bicycling proposal from the Brighton, Vermont, Selectboard and a local individual. Given its growing popularity, they view biking as an economic boon to the community. The VFWD commends our consideration of a range of compatible uses, bicycling riding among them.

One commenter requests clarification as to whether prohibiting “off road bicycling” equates to a disallowance of off trail riding. They further note that Massachusetts DCR and Quabbin Reservoir allow extensive non-motorized trail biking and that this use should not extend to refuge lands. Along this theme, another commenter opposes creating new trails as this would constitute a loss of habitat and interfere with the ever diminishing wildlife travel ways.

Response: A long-standing desire to allow bicycling originated at the Nulhegan Basin Division, which has an extensive gravel road network and except for certain times, is lightly traveled by vehicles. As such, we are proposing to allow bicycle riding on roads open to vehicular traffic at the Nulhegan Basin (re: appendix A, Nulhegan Basin Division, goal 3, subobjective 3.4c.), as well as other refuge lands, as applicable. We are not proposing new bicycle trails, the use of bicycles on pedestrian trails, or off-road bicycling.

Non-Priority Public Uses Not Allowed on Refuge (ID#s 21, 32, 51, 82, 94, 123, 167, 223, 225, 237, 284, 311)

ATV/ORV/UTV Use

Comment: We received comments regarding the use of ATVs on refuge lands. Comments by the CLLTIA and their supporters consider ATVs to provide a legitimate recreational opportunity enjoyed by residents and guests and favor allowing ATVs on refuge roads and permitting refuge lands to be used as connector trails. They suggest it could be an economic boon for the area. Most “favorable” statements focused on Vermont and advocated for some reasonable ATV access to Conte Refuge lands. Commenters note that the Vermont ATV Sportsman's Association (VASA) now operates a successful network of roughly 800 miles of ATV trail Statewide. Disallowing the use of ATVs across our proposed level of land acquisition would therefore have a detrimental effect to VASA's trail network. It was also noted that ATV trails would be a “boon to the refuge and local economy.”

The CLLTIA Association also contends that our finding of appropriateness exaggerates the impacts of managed ATV trails in a manner that conflicts with the State of Vermont's recent analysis of a trail at the Les Newell Wildlife Management Area.

We also received comments opposed to allowing ATVs. The principal objection was to the activity's detrimental effect to habitat and wildlife, including that associated with creating new trails.

Response: It is important to recognize that national wildlife refuge lands are subject to particular laws, regulations, and policies, and that these may differ from those laws, regulations, and policies that apply to State lands or other Federal lands, such as National Forests. Federal laws and regulations take precedence over State authorities and as a refuge unit, we adhere to those measures specific to our agency, the National Wildlife Refuge System, and our specific authorizing legislation. Specific to recreational activities, the 1997 National Wildlife Refuge System Improvement Act requires that a

proposed use first be found “appropriate” in a finding of appropriateness and if appropriate, then be found “compatible” via a compatibility determination. Our Finding of Appropriateness (page D-1) determined that ATVs were not an appropriate use of refuge lands; and therefore by applying the appropriateness policy would not be allowed.

Based on our understanding VASA maintains trails in roughly 16 “cells” across Vermont, many of which are outside the Connecticut River Watershed. Of those cells within the watershed, we are not proposing any acquisitions that would affect trails in the northern portion of the State; we are less familiar with the trail networks as they relate to our proposed acquisitions in the southeast quadrant of Vermont. It is our understanding that at least some VASA trails overlay class IV town public roads. If this is the case, we will not be acquiring such roads as part of our proposed land protection strategy and would therefore have no effect on such existing trails. In short, should we pursue acquisition of a property containing an ATV trail at some future date, the disposition of the trail could be a point of negotiation between the seller and Service; we also suspect that while perhaps not the preferred option, ATV trails may be re-routed, thereby enabling a local trail network to remain intact.

We further contest the commenter’s reference to our non-compliance with State law. We would emphasize that the Vermont Agency of Natural Resources recently proposed a *rule* to provide for connector trails on their wildlife management areas. In a follow-up email, the commenter confirmed that the rule was not finalized – “the Legislative Committee on Administrative Rules felt the rule was beyond the Agency of Natural Resources statutory authority and voted against it. The Governor can proceed with the rule in such a case, but decided to respect the Committee’s decision”. We would contend that such State land-specific rules are intended for State-managed properties and would have no bearing on refuge lands. Lastly, we would note, because existing refuge lands do not bisect an existing ATV trail, the absence of an opportunity to facilitate a connector trail further makes this proposed rule moot.

Specific to the Nulhegan Basin Division, the implication this activity was allowed prior to our acquisition of these lands and subsequently banned by the Service is false. While illicit ATV riding may have occurred on the Champion International timber lands, the company did not allow their use and we continued the practice of not allowing ATVs following our acquisition of the property. Likewise, the other entities purchasing the Champion lands (State of Vermont and Essex Timber Company) also continued to disallow ATVs. Therefore, to this day, ATVs are not allowed on any of the properties bordering the Division: the neighboring Weyerhaeuser timber lands, McConnell Pond tract, Wenlock Wildlife Management Area, or the West Mountain Wildlife Management Area to the immediate south of the Division. In summary, there is no currently existing network to which the Division can provide “connector” trails.

The Nulhegan Basin Division’s road network already allows adequate access for “street-legal” vehicles in order to pursue the range of allowed recreational activities (e.g., hunting, fishing, wildlife viewing, hiking, cabin access, canoeing, etc.) The road network is also available to pedestrians and as proposed in this action, bicycles. A further reason to not consider ATVs is the potential conflict with safe access by these other users.

Target Shooting

Comment: The inability to target shoot on the refuge is a significant issue for some of those associated with recreational cabins within the Nulhegan Division and surrounding public and private timberlands. The CLLTIA and several individuals request that we rescind a ban on target shooting, based on a history of safety on neighboring lands and that such use teaches people about safe gun handling and helps hone hunter skills. It was suggested that people be allowed to target shoot in sand pits and other safe places. Several of these same commenters also urged that target shooting “be allowed as per Vermont law with no extra Federal requirements.”

A more specific comment references section 5(a)(3)(k) of the 1997 National Wildlife Refuge System Improvement Act. This section states: "With respect to the System, it is the policy of the United States that {the Refuges} provide increased opportunities for families to experience compatible wildlife-dependent recreation, particularly opportunities for parents and their children to safely engage in traditional outdoor activities, such as fishing and hunting."

Response: Prior to acquisition by the Service, target shooting occurred in a random fashion at multiple locations on the lands now contained within the Nulhegan Basin Division. We disallowed the use upon acquisition and are proposing not to allow target shooting on any existing or future refuge lands. Target shooting was found not appropriate in the Findings of Appropriateness based on safety and environmental concerns, as well as, an inconsistency with Federal regulations. Activities determined to be "not appropriate" may not be allowed on national wildlife refuges. We performed an online search of shooting range-related statutes in Vermont and only found regulations applying to the use of ranges located on Vermont Fish and Wildlife Department lands.

We believe the use of section 5(a)(3)(k) is a mischaracterization of the Improvement Act. This section pertains to wildlife-dependent recreation. Target shooting is not a wildlife-dependent activity. As described in our Finding of Appropriateness in appendix D, while target shooting can hone certain hunting skills, it is not in fact hunting. We would further note that the section cited, as well as, the Improvement Act overall base authorized activities on their "compatibility". Target shooting was found to be not appropriate and by definition, is therefore, not compatible. That said, we do agree with the value of teaching firearms safety and enhancing hunting skills – and are pleased to note that the Vermont Fish & Wildlife Department opened the West Mountain Shooting Range at West Mountain Wildlife Management Area in 2016. This new shooting range is near the Nulhegan Basin Division and should provide the opportunity desired by the commenters.

Comment: A commenter from Massachusetts suggests establishing shooting ranges throughout the Connecticut River corridor in order to provide a controlled environment under which contamination could be better managed.

Response: We agree that a controlled environment is best suited to manage lead contamination; however this is a State and/or municipal regulatory issue and not something within the refuge's authority nor are shooting ranges an appropriate use of refuge lands.

Model Airplane Use

Comment: In response to our proposed prohibition on model airplane use in the draft plan, a commenter suggested we use a more encompassing term that could address future innovations that pose unwarranted stress to wildlife. One option would be to also note that drones would not be allowed.

Response: We have modified our Finding of Appropriateness in appendix D of the final plan for model airplanes to address a broader context. It includes manned and unmanned aircraft for recreational uses (e.g. model airplanes, recreational use of drones, ultralights, etc.). We found these uses to not be appropriate on the refuge.

Other Uses Not Evaluated in Detail (ID#s 32, 82, 105, 167, 200, 206, 223, 237, 252)

Horseback Riding

Comment: A commenter suggests implementation of a permit system to allow for horseback access to Nulhegan Basin Division. Such an activity would be limited to a small group, for day use only, limited to specific roads, and require manure management. They point out that such activity is currently allowed at the adjoining West Mountain and Wenlock Wildlife Management Areas.

They contend that our current allowance of certain activities constitutes greater environmental impacts than horses. For instance, permitting snowmobiles poses greater impacts through noise and emissions pollution

and the translocation of weed seed from more southerly areas that can be picked up during low-snow conditions. They further note that fishing also offers the potential for introduction of invasive species.

The VFWD commends our consideration of a range of compatible uses, horseback riding among them.

The CLLTIA and their supporters offer a comment in opposition to activities that directly conflict with traditional uses, such as equestrian trails.

Response: Chapter 4, objective 3.4, discusses our approach to regional and unit-based recreational trail activities. Where our ownership coincides with existing regional trails, we note our intent to maintain their continuity. With regard to the existing refuge lands, a proponent would first have to demonstrate how the proposed trail provides a linkage to an existing trail network. If such a trail connection appeared reasonable, we would then prepare a site-specific compatibility determination that would evaluate the effects of such a use and describe measures needed to ensure compatibility. As necessary, the Service would coordinate with the State, stakeholders, and the public to comply with NEPA. These actions would be best addressed in a comprehensive way as part of a visitor services/public access plan.

A compatibility determination for snowmobiling may be found in appendix D; we would likewise prepare compatibility determinations for fishing when refuge units are formally opened to this use.

Rock and Ice Climbing

Comment: A commenter references the tradition and we presume support for rock and ice climbing at Lyme's Holts and Winslow Ledges. The commenter also notes that this activity can extend into the evening hours; beyond our proposed daily closure time.

Response: We are not familiar with the area referenced nor are we aware of the extent and location of this activity. It is not occurring on existing refuge lands. If we should acquire these lands, we would need more information on where these activities are occurring in order to prepare an appropriateness finding and compatibility determination. We would have concerns with disturbance to wildlife, degradation to rock faces, access, parking, etc. We encourage the rock and ice climbing community to provide us with additional information for future reference.

Motorized Boating Access

Comment: The Connecticut Chapter of Delta Waterfowl points out the benefit in providing access for 20-foot motor boats given the strong currents and high winds along certain reaches of the Connecticut River. The ability to launch boats of this size would also foster the work of rescue organizations.

Response: This request is beyond our typical range of activities and abilities - and is perhaps best directed to the respective State fish and wildlife agency. We do not have plans to build infrastructure to support boats of this size on the refuge and most of the water bodies supporting boats of this size are under the jurisdiction of the respective States. Should some future opportunity present itself and we have staff and funding to collaborate with the States, we will evaluate our potential role in such process. Although perhaps not meeting the commenter's desire, we believe there are marinas along the Connecticut River mainstem that can accommodate boats of this size.

Cabin Leases at Nulhegan Basin Division (ID#s 32, 82, 123, 156, 167, 223, 237)

General

Comment: Comments regarding the cabin lease program at the Nulhegan Basin Division ranged from appreciation that there are no changes proposed to the administration of recreational cabins, an acknowledgement that leaseholders are good stewards of the land and should receive greater weight in

planning decisions, and that leases should be extended beyond the 50-year sunset date in order to perpetuate the “camp culture”.

Response: We are proposing no changes to the way recreational cabins are administered at the Nulhegan Basin Division, including adherence to the 2049 termination of leases that was established in planning documents following our acquisition of the Nulhegan Basin Division in 1999. We would note that as described in the plan, identical practices would be applied to cabins located on the McConnell Pond tract should this parcel be acquired by the Service.

We have enjoyed a positive relationship with leaseholders since the Division was acquired in 1999. They will, as well as the general public, be included in refuge management considerations (as exemplified in this CCP process). We would point out that with the exception of State fish and wildlife agencies, “greater weight” is not afforded to any group; public input is not a vote – rather it is a means to obtain valuable insights, perspectives, and clarifications/corrections. We would also note that due to privacy concerns, we have not requested and do not maintain an email directory of leaseholders. Those individuals desiring direct notification of proposed actions are invited to supply the refuge manager with their email address – or request US Mail notification in the absence of an email account.

Comment: One current cabin leaseholder requested that without ready access to appropriate firewood adjoining his cabin, that firewood be made available elsewhere on the division.

Response: The 2011 special use permit (SUP) for privately-owned cabins notes that “only trees downed by natural causes within or adjacent to the premises, or those that have fallen as a result of natural means across a refuge roadway, or other trees as specified by the refuge manager, may be cut for camp firewood.” Please contact the refuge manager with suggested firewood collection location(s) if you are unable to gather sufficient wood as per the quoted stipulation. The SUP further limits the importation of firewood from nearby counties in order to minimize the chance of introducing devastating forest pests such as emerald ash borer and Asian long-horned beetle.

Furbearer Management, Including Trapping (ID#s 2, 5, 6, 8, 12, 14, 17, 19, 22, 23, 25, 26, 27, 28, 33, 34, 36, 48, 49, 50, 52, 55, 56, 57, 63, 65, 69, 74, 80, 84, 93, 94, 95, 96, 98, 104, 108, 111, 112, 115, 124, 125, 126, 131, 146, 150, 154, 159, 163, 164, 165, 168, 169, 170, 171, 173, 177, 180, 185, 186, 187, 190, 192, 193, 194, 195, 200, 201, 203, 207, 208, 211, 215, 218, 219, 223, 224, 227, 228, 235, 247, 248, 249, 253, 255, 256, 270, 273, 285, 291, 292, 295, 302, 304, 307, 318)

Opposition

Comment: Among the comments opposed to trapping included a petition hosted by Protect Our Wildlife that collected more than 2,500 signatures. The petition's key points include:

- Furbearer trapping is NOT compatible with the stated purpose of a wildlife refuge.
- Federal law requires an Incidental Take Permit (ITP) (presumably for Canada lynx); an ITP has not been granted, yet USFWS is still allowing trapping.
- Only effective way to protect lynx from trapping is to prohibit trapping in areas where there have been confirmed sightings, such as Nulhegan Basin.
- Lynx are often mistaken for bobcats - a species targeted with trapping.
- Trapping is indiscriminate.

Many of the other comments in opposition included these points as well. Commenters noted concern for Vermont's protected species such as Canada lynx, grey wolves, and bald eagles, hawks, American marten, as well as other non-target species. Some commenters asserted that the Nulhegan Basin Division is used by “many protected species” as an added reason to disallow trapping and that many other opportunities

for trapping exist elsewhere in Vermont. They further noted our legal obligation to protect federally listed species, such as lynx.

The Center for Biological Diversity also contends that trapping is not necessary for professional wildlife management and runs counter to the State of Vermont's conservation priorities. More specifically, they note that three species trapped at the Nulhegan Basin Division (muskrat, bobcat, and river otter) are on Vermont's list of Species of Greatest Conservation Need.

Response: We recognize trapping as an historic and traditional activity on many areas in the Northeast.

Trapping is a management tool employed on many refuges across the Refuge System, including Conte Refuge. We also allow a general trapping season on the Nulhegan Basin Division according to Vermont regulations. We describe our current program in chapter 4 under "Actions Common to All Alternatives, Furbearer Management" and in appendix D "Compatibility Determination for Furbearer Management." Trapping occurred on the Nulhegan Basin Division prior to acquisition by the Service and has continued since the property was acquired in 1999 under VFWD regulations. On future land acquisitions, 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 coordinate with the State, stakeholders, and complete a NEPA compliant document, a compatibility determination, and a furbearer management plan that is vetted publically.

The VFWD adopted new trapping measures in 2013 in since the detection of lynx in and around the Nulhegan Basin Division. We have adopted those same measures in our public trapping program. We will continue to monitor for the presence of lynx and the potential for trapping related impacts.

Comment: A fundamental perspective held by many is that trapping is inhumane and unnecessary, and that "to allow trapping to simply appease a handful of trappers, while simultaneously endangering so many different species of animals is in direct conflict of what a refuge is supposed to represent."

One commenter notes that while a need for wildlife management exists; trapping is inappropriate because its original purpose no longer exists. The commenter continued that there is no "human need so dire as to justify the unfair use of technology against fur-bearing creatures."

Response: While this is clearly an activity that elicits strong emotions, we would contend that trapping as practiced according to State regulations serves to maintain a balance among wildlife populations without "endangering" any species. Trapping is an important management tool used on National Wildlife Refuges throughout the system and is common to all alternatives. See chapter 4 "Actions Common to All Alternatives," and appendix D "Furbearer Management Compatibility Determination" for more details.

Comment: A commenter contends that the rationale of controlling predator species with trapping so that they do not "starve to death when their prey runs out" is inaccurate. Rather, they note that predator/prey populations have always fluctuated in predictable patterns, and that trained biologists are best suited to manage these species.

Response: In appendix D "Furbearer Management Compatibility Determination," under "Impacts to Furbearers," and "Impacts to Other Wildlife," we address these concerns.

Comment: Several commenters expressed a desire to ban trapping throughout the entire Conte Refuge.

Response: We are only responsible for practices occurring on those lands we administer. Currently, trapping occurs at Nulhegan Basin Division is consistent with State regulations, whereas we enlist trappers at Pondicherry Division as a management action to address beavers whose activities threaten infrastructure.

Comment: Regarding our furbearer management compatibility determination, we noted a temporary disturbance to wildlife by trappers as they drive the division's roads and walk out to their trap sets. Therefore, a commenter asked, what benefits does trapping provide that would "justify the wishes of the minority who trap"?

Our compatibility determination also notes that trapping coyotes, a lynx competitor, may increase available prey for lynx. A commenter noted that killing coyotes only stimulates greater reproduction.

Response: Trapping is a longstanding, sustainable, legitimate use of renewable resources recognized by the State. A trapping minority today does not preclude potential future growth in numbers. Please refer to appendix D "Furbearer Management Compatibility Determination" under "Beneficial Effects" for further details regarding benefits of trapping. We are unaware of research that determines that killing coyotes stimulates greater reproduction and would be interested in any information you may have.

Comment: A commenter addressed the special use permit (SUP) process we use to administer this use. They suggested our proposed measures, such as setting traps on leaning poles at a minimum 45-degree angle, are inadequate to protect lynx. They contend lynx were trapped and died in Maine where this stipulation was in effect. They further noted that our measures involving leg-hold traps do not prohibit lynx from becoming immobilized from 24 hours or more and subjected to predation, hypothermia, and other threats.

Response: We are working with our Ecological Services office and the State to ensure compliance with the Endangered Species Act. Our Furbearer Management compatibility determination in appendix D contains further details on monitoring protocols and administrative plans.

Support

Comment: Several comments note that, similar to their comments on hunting and fishing, that we allow trapping following regulations established by the State fish and wildlife agency.

Response: The Nulhegan Basin Division is the only refuge unit currently open to a general trapping seasons. We apply VFWD regulations to manage this use at this location. Appendix D includes the compatibility determination for trapping on Nulhegan Basin Division and describes how it is managed. With lands to be acquired on other divisions, 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.

Comment: Comments ranged from general support for trapping as a biologically sound wildlife management tool with regulations established according to biological and scientific data, to a traditional land use in Vermont that provides a connection to the natural world. One commenter noted that conservation is predicated on the benefit afforded the whole population. Other commenters stated that trapping is a means to reduce overpopulation that may lead to disease, as well as, a way to earn money in an economically depressed part of the State.

One person describes the benefit gained by her daughter attending a conservation camp and learning trapping skills, among others. This experience provided a deeper understanding of ecosystems and the care for the environment. When traps are properly set, this commenter states there is no unnecessary suffering by animals.

Response: Your comment is noted.

Comment: CTDEEP suggests that we evaluate trapping opportunities and prepare compatibility determinations on all refuge units. Other commenters recommend we work expeditiously to provide additional trapping

opportunities as additional refuge lands are acquired and that trapping should be maintained as a management option for easements.

Response: We use trapping as a management tool across the refuge to achieve specific objectives, usually to prevent damage to infrastructure, promote safety, or minimize degradation of habitats. We use either refuge staff, or a certified or contract trapper, to conduct trapping under those circumstances. We have completed the administrative process to open refuge lands to a public trapping program only at Nulhegan Basin Division. On future land acquisitions, 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 coordinate with the State, stakeholders, and the public, and complete a NEPA compliant document, a compatibility determination, and a furbearer management plan (e.g. the requirements of our administrative process).

With regard to easements, if we acquire the right in the easement to manage the land, trapping could be used as a management tool to accomplish our objectives. Under this type of easement, we may trap to benefit wildlife and species, and/or to protect infrastructure or habitat.

Comment: Several comments involved Canada lynx. One person noted that lynx had expanded from northern Maine into New Hampshire and then Vermont – and this expansion had occurred in concert with trapping and that trapping is part of this success. Others requested no additional regulations beyond those administered by the State, and believed that recent regulations instituted by VFWD to protect lynx would be effective. Some commenters noted that no lynx had been documented in recent years, or are being used as a “red herring” to attack trapping. A commenter also noted that the use of the proposed lynx exclusion devices would eliminate the incidental capture of lynx.

Response: We believe the characterization of the spread of lynx across northern New England is correct, although we cannot attribute the role of trapping to this occurrence. It is also correct that despite increased surveillance in recent years, we have not detected a lynx since February 2014 at the Nulhegan Basin Division. We are awaiting a review of the results from the winter 2015/16 survey effort. We would caution that our inability to detect lynx does not mean they are absent. Our responsibility to protect and manage federally listed species is paramount, and will be vigilant to the presence of lynx and adjust or adopt management as warranted.

Comment: We also heard a sentiment that these lands, “bought by federal dollars collected through taxes paid by citizens...should be left open for all uses,” including trapping. Another commenter stated that the amount of posted land in Vermont is making it difficult to find places to hunt and trap; we should be trying to open more land to the people for these uses, not closing areas.

Response: We believe our history of public use and future intent as described in the draft CCP demonstrates a commitment to allow access to a broad range of uses. We want to be an asset to local communities and have done so by offering environmental education programming for local school children, providing forest firefighting equipment, and leveraged Federal dollars for local road improvements. That said, we have a responsibility to manage Federal lands for all citizens.

We agree that the posting of private lands can be a serious problem for outdoor recreationists - and that over time, access to lands will only become reduced further. We would contend that the acquisition of refuge lands is one way to ensure greater access for wildlife-dependent activities over time - and also a way to maintain the type of landscape desired by longtime residents.

Comment: The Connecticut Chapter of Delta Waterfowl Foundation requests that the current fee to trap State land be waived for trapping on the Federal wildlife refuge.

Response: We require no special or additional fees for trapping.

Special Areas Designations (ID#s 32, 82, 90, 123, 135, 167, 213, 215, 223, 237, 241)

National Natural Landmarks

Comment: We received support for our proposal to expand the National Natural Landmark designation to an additional 694 acres at the Pondicherry Division. Support for including these previously unmanaged peat lands was offered by the National Park Service, Jefferson Conservation Commission, and Friends of Pondicherry. Among the notable benefits are augmenting the existing designation to both aid management and offer a natural laboratory for the study of wetland processes.

Response: Your comment is noted.

Comment: The National Park Service noted our error in misstating the date of the National Natural Landmark designation at Pondicherry Division as 1974. The correct date is 1972. They also offered a correction to the number of existing National Natural Landmarks within the Connecticut River watershed (page 3-35, App. C-45). Rather than the three we noted, all of which are in New Hampshire, there are actually 14 dispersed across all watershed States. They provided us with a list and map of locations.

Response: Your comment is noted and we have made the change.

Wild and Scenic Rivers

Comment: The Center for Biological Diversity advocated for designation of suitable wild, scenic, and recreational rivers in cooperation with intergovernmental and private partners during the life of the CCP.

Response: In the final CCP/EIS under appendix F, we detail our wild and scenic rivers review. We identify rivers that met some of the criteria for designation, but we do not make any recommendations. Our strategy is to work with partners to look more holistically at entire river stretches or segments. To be respectful of jurisdictional boundaries, we will be focusing on collaborations that include existing and/or potential refuge lands and stretches of river and stream beyond those boundaries.

Wilderness

Comment: The CLLTIA, and several supporters noted “Federally designated “wilderness”, “ecological core areas” or other restrictive land classifications that prohibit such things as timber cutting, road access, motorized uses, and other uses should not be imposed on the Refuge” because this would “conflict with traditional uses and is exclusionary” to a majority of the public. They also described managed forests as beneficial to a majority of wildlife species.

This organization further believe it inappropriate to re-evaluate wilderness consideration 30-50 years hence as described on page E-13, noting the existence of wilderness areas in the Green Mountain National Forest and other national forests in New England, as well as more locally, a contention that “wilderness-like” areas exist at the West Mountain Wildlife Management Area and Weyerhaeuser timber lands.

The Center for Biological Diversity would prefer a wilderness designation at the Nulhegan Basin Division. They noted that although lands with the greatest potential for wilderness quality presently lack important criteria, selection of alternative D, or a similar alternative that emphasizes minimal habitat manipulation and backcountry character, it's likely that some parts of the Nulhegan, as well as other Refuge lands, would eventually meet wilderness criteria. They urged us to manage certain parts of the Refuge for wilderness characteristics that will return over time.

Response: We are required to do wilderness reviews as per Service policy 602 FW 2 during the development of CCPs. This review includes an evaluation of lands owned in fee by the Service to determine whether they meet the criteria and should be recommended for National Wilderness Preservation System lands. CCPs are reevaluated every 15 years, including the wilderness review. The next review will include all lands acquired in fee for the refuge.

Our wilderness review on existing refuge lands owned in fee by the Service is detailed in appendix E. The wilderness review did not recommend a further consideration of wilderness designation for any current refuge holdings at this time. This was based on current characteristics and the need for active habitat management at the Nulhegan Basin Division (the only refuge unit meeting minimum wilderness criteria) in order to meet refuge purposes and achieve our wildlife and habitat goals and objectives.

One consideration for future evaluations of wilderness will include our plans for habitat management. We will be developing an HMP for each division. That process will include public involvement and a NEPA compliant document.

We would clarify that wilderness designations are made by Congress and apply to Federal lands, including those managed by the Service. Therefore, any State or private lands designations referenced by commenters do not factor into the evaluation.

Blueways

Comment: Audubon Connecticut highlighted the existence of the Connecticut River watershed's designation as the nation's only National Blueway. They advocated the inclusion of the Blueway's principles in the final CCP/EIS.

Response: We highlight this status in chapter 3. We also reference it in chapter 4, goal 4, objective 4.5 Special Designation Area partnerships.

Non-toxic Ammunition and Tackle (ID#s 32, 53, 82, 99, 135, 167, 213, 223, 237)

General

Comment: The CLLTIA and several of its members note that "A ban on lead ammunition was rejected by the 2007 Vermont Legislature as unnecessary and not supported by the science presented." Another commenter states that lead poisoning was not an issue in an upland environment.

The Jefferson, New Hampshire, Conservation Commission, Friends of Pondicherry, and Mattabesek Audubon Society point out the harm caused by lead shot and sinkers. Recommendations include the use of non-toxic shot for small game hunting (mammals and birds) and the banning of lead tackle from refuge waters.

Response: We are not proposing a ban on lead ammunition or lead fishing tackle (chapter 4, "Actions Common to All Alternatives," page 4-39). Rather, we are proposing to work with the respective State fish and wildlife agency "to identify and evaluate the impacts associated with requiring the use of non-toxic ammunition for hunting on refuge lands." With regard to fishing tackle, we are proposing to promote the use of lead-free tackle in our fishing publications. As we move forward, we will take into account any relevant legislation passed within the States, and will also rely heavily on the science related to the effect of lead on fish and wildlife.

Facilities and Infrastructure (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 82, 94, 99, 105, 134, 167, 223, 237)

General

Comment: CLLTIA, VFPA, VTC, Board of Governors of Unified Towns and Gores, Vermont, and other individuals emphasized the maintenance of existing facilities and infrastructure as sufficient and discouraged any further development of trails, buildings, or roads. Most of these same commenters also suggested keeping current roads open to public use.

They note the West Mt. WMA public hearings concluded a public majority in support of maintaining the raw and rugged nature of undeveloped recreation as opposed to trail development. These same commenters also requested “refuge buildings be compatible in scale and style to the rustic character of the region,” noting “Federal Refuge Headquarters did not meet this objective.”

Response: We will look at infrastructure in more detail as we develop visitor services and habitat management stepdown plans. We have no plans to construct any new buildings. Rather, we are removing infrastructure such as buildings that are excess to our needs for operational purposes. Subject to availability of funds and completion of our environmental compliance process, we do intend to provide a universal access opportunity on most of our existing and proposed CFAs/divisions.

Comment: Mattabesek Audubon Society suggests re-purposing of existing logging and farm roads for trails should be emphasized over new construction.

Response: We agree that it is important to repurpose old roads for management access or public use, where appropriate, rather than create new ground disturbance. We currently follow this practice. Examples include the North Branch Trail at Nulhegan Basin Division and the Mud Pond Trail at the Pondicherry Division - both follow existing roads.

Habitat Management (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 45, 62, 82, 83, 94, 99, 102, 122, 123, 127, 141, 143, 155, 156, 167, 174, 179, 180, 183, 195, 214, 222, 223, 237, 244, 251, 252, 263, 268, 272, 278, 282, 306)

Support

Comment: Many commenters wrote in support of active habitat management, and more specifically active forest management.

Response: Our habitat management as outlined in the CCP includes forest management on all of the proposed CFAs. More detailed management prescriptions that identify appropriate areas, the scale and form of management, and other considerations will be outlined in CFA-specific HMPs as lands are acquired. These HMPs will also be made available for public review and comment. We remind readers that our forest management is driven by the habitat needs of refuge resources of concern, including focal species identified within each CFA. This is in contrast to more traditional economic or timber goals.

Comment: We heard from individuals and organizations that were disappointed in the low level of proposed forest management, suggesting it didn't represent a 'healthy balance.'

Response: Forest management on National Wildlife Refuges is driven by the habitat needs of identified focal species, refuge trust resources, and the legislated purposes of a refuge, rather than a balanced rotation as might occur on private lands. The CCP is a long term strategic plan. We expect it would take decades to accomplish, depending on willing sellers and our track record on land acquisition for this refuge. The HMP for each division will determine where, how, and how much forest management is recommended to achieve our wildlife and habitat goals and objectives.

For purposes of the CCP analysis (Table 5.4 and appendix I - Table I-40), we proposed treating 750 acres/year. This acreage figure is intended as an estimate of the scale of management the refuge felt it could accomplish given a number of assumptions: full staffing as envisioned in alternative C, our current administrative rules and policies, and full acquisition of 197,000 acres. We recognize that should the refuge acquire all 197,000 acres as proposed in the CCP that habitat needs of focal species may call for more than 750 acres a year in forest management. It is possible, with additional funding, we may be able to accomplish more. We view a healthy balance as including unmanaged areas with those managed using even-aged and uneven-aged techniques. The ratio of these approaches within a given CFA will be outlined in stepdown HMPs. Ratios will reflect current conditions of the forest at the time of acquisition, as well as forest conditions on surrounding ownerships – an approach we feel represents both our mandate and a healthy balance. As we develop HMPs, we will explore ways to engage partners to facilitate implementation. The Nulhegan Basin Division HMP is our highest priority HMP to complete after CCP approval.

Comment: New Hampshire Audubon wrote to affirm the importance of managing lands the refuge currently owns and hopes to acquire, specifically: “a focus on protecting and restoring wetlands and floodplain forests in the southern reaches of the watershed.... protect and manage areas of unfragmented forest in the northern reaches will maintain breeding habitat.” The commenter suggests rewriting the goal to emphasize partnerships to achieve wildlife and habitat goals.

Response: We agree that wetlands and floodplain forest are vital habitats to conserve in the watershed. We identified the Quonotuck CFA specifically to address these resources. They are also identified as priority habitats in individual CFAs in appendix A.

We agree that partnerships are critical to accomplishing the CCP and established goal 4 to reflect how significant those relationships are. However, we do not think it necessary to rewrite goal one to mention partnerships. We address the importance of partnerships in its own goal - goal four.

We agree that habitat conservation, coupled with the restoration of altered habitats throughout the watershed are important goals the Refuge must follow to meet the intent of the Conte Refuge Act of 1991. And we agree that partnerships are critical in achieving these goals.

Comment: A number of commenters encouraged refuge staff to aggressively manage the timber resource to benefit wildlife, particularly in areas known to aid wintering deer. These commenters noted that a lack of active forest management can be detrimental to suites of species dependent upon forest disturbances.

Response: We agree with commenters that forests on the refuge must be managed. Our proposed management in the CCP attempts to find the appropriate balance of forest management within a given CFA, with the priority to manage for focal species we identify in appendix A by CFA. We propose management to create early successional conditions vital to focal species, such as woodcock in northern areas and chestnut-sided warblers in southern areas. However, our management also include promoting late successional forests which are largely missing from the New England landscape, allowing some forests to mature creates important ecological conditions for some of our focal species.

In appendix A, for those CFAs we know to have critical deer winter yards, we have a strategy to work with the State and other partners to manage those deer winter yards and corridors since they may straddle refuge lands and other ownerships.

Comment: A commenter from Massachusetts Audubon noted their support for the CCP's efforts to protect “grasslands, shrublands, and interior forests.” This commenter also noted that the expansion of early successional management proposed in the plan was a priority shared by Massachusetts Audubon, MassWildlife, and other organizations.

Response: Early successional habitats are critical for a number of declining songbirds and other species. This is a particular problem in the southern portions of the watershed where landowners may be reluctant to manage their forestland. The CCP recognizes this problem and outlines our intent to manage early successional habitats, particularly in southern portions of the watershed.

Comment: A commenter noted that the Ruffed Grouse Society reported to Congress a study showing the Forest Service has met 25 percent of its young forest target on Federal forest lands. The commenter goes on to argue the importance of young habitats, and their creation on the Conte lands.

Response: We do not expect a similar outcome on Conte lands. Our forest management is habitat driven and young forest habitats are in decline throughout much of the watershed. We note this decline in our discussion of southern CFAs in appendix A. Our CCP documents our intent to create young forest habitats where appropriate to benefit Refuge focal species (e.g. appendix A, page A-205 Whalebone Cove CFA). HMPs will provide the details on the priorities for where and when management is proposed within respective CFAs.

Comment: Representatives from CTDEEP suggested the importance of working with State and local partners from the agriculture industry before managing floodplain forests. This commenter goes on to note the importance of “working with Federal, State, municipal, and NGO partners within CFAs and CPAs to facilitate cooperative management strategies.”

Response: The success of the Conte CCP and landscape-scale conservation more broadly is predicated on working closely with partners at local scales. We acknowledge this importance, as evidenced by our goal four which specifically elevates the significance of partnerships in accomplishing conservation in the watershed (see chapter 1 Refuge Vision). We intend to work closely with our State partners as well as those in private industry to achieve restoration actions on the ground. This is particularly true in reference to many of the proposed actions suggested by the commenter: containing invasive plants and pests; protecting and restoring floodplain forests; and facilitating fish passage through removal of dams or culverts.

Comment: The Vermont Traditions Coalition and the CLLTIA had many positive comments on habitat management at the Nulhegan Basin Division and more broadly in the watershed. In particular, this organization is concerned with an insufficient level of proposed forest management, forest management within the deeryard in the Nulhegan Basin, and recognition of the role forest management plays in the local economy of Essex County.

Response: We respond to comments regarding the level of active forest management and management of deer yards above. We appreciate the concern that refuge acquisition and management may impact the local economy of Essex County and other forest-dependent communities. In managing land for priority wildlife and habitats, any economic benefits are incidental to what is driving our management. A fuller discussion of economic considerations is presented in section 28 (Socioeconomic Impacts) of appendix I.

We acknowledge the importance of conserving working farm and forest lands in chapter 4, “Actions Common to All Alternatives”. We state in chapter 4 that we will continue to seek opportunities to facilitate the enrollment of these lands into programs that conserve these uses. Once enrolled, we consider these lands conserved and an important part of the working landscape. Easements will be a tool we will employ to help private landowners continue forest management consistent with accomplishing wildlife and habitat goals.

Comment: The NHTOA suggests “the low-level of current and proposed forest management will adversely affect wildlife population within the species which are dependent upon early successional habitat.”

Response: We respectfully disagree with NHTOA's characterization of consequences to early successional wildlife and our early successional management intentions for two reasons: our CCP does propose forest management to benefit early successional dependent species where a larger-scale analysis shows this forest condition to be lacking (see appendix A discussion for CFAs in the southern portion of the watershed); and early successional forests are commonly created on private forests, particularly in the northern portion of the watershed.

The intention of the refuge is to provide appropriate habitat for our focal species, particularly when that habitat is lacking on surrounding public and private lands. The CCP takes the general view (which follows FIA data) that northern portions of the watershed are subject to greater and more intensive forest management, which in turn creates early successional habitats. The CCP contrasts this with the southern, more urban portion of the watershed where forest management occurs far less frequently, and early successional habitats are in decline. The broad forest management guidelines in the CCP call for early successional management on all refuge lands where appropriate, with an emphasis on areas in the southern part of the watershed.

Comment: A reviewer felt adding "flood resiliency to the goals of protecting floodplain forests" would improve the floodplain forest goals.

Response: The comment is noted. The floodplain forest goal has been modified to include language highlighting the importance of flood resiliency. Check mention of floodplain forests page 4-56.

Comment: One commenter is concerned "with the lack of management this proposal will bring upon these acreages and the long-term negative impacts to forest health."

Response: The CCP outlines our plans to actively manage Refuge forests where doing so will benefit identified focal species. The types of management and their extent will be outlined in forthcoming HMPs.

In our response above, we describe how our forest management decisions are driven by the habitat needs of the identified focal species for a CFA. There are species that benefit from forest management and species that are negatively impacted by forest disturbance. Put differently, forest succession is paced by changes in the relative abundance of a handful of conspicuous, dominant plants, but along with these species, thousands of plants and animals come and go too - their populations waxing and waning - as succession proceeds. Managing forest landscapes for diversity (as required by Service policy) involves managing patterns of succession for two reasons: some successional stages have more species than others; and each stage has a different, although not usually unique, set of species. Forest management on the refuge will work to provide all successional stages common to a particular forest type. In some cases this will mean a lack of active forest management.

Our review of the literature has been unable to find any information, outside of invasive species outbreaks, suggesting that failing to harvest trees leads to "long-term negative impacts to forest health."

Comment: A commenter emphasized that "all of these areas can benefit substantially through careful forestry stewardship with an emphasis on habitat management and recreational benefits."

Response: The commenter's insights are duly noted. We agree that refuge lands will benefit from careful forest stewardship.

Comment: The White Mountain National Forest supervisor wrote to compliment our emphasis on floodplain and riparian forests. They noted this is an identified priority in the White Mountain National Forest Land and Resource Management Plan, and suggested collaboration with the Refuge as a possibility.

Response: We look forward to any collaboration, whether they be in floodplain forests or elsewhere, with the Forest Service.

Comment: CTDEEP notes the importance of consulting and including relevant State-level plans when developing CFA-specific stepdown HMP. They are particularly concerned that we incorporate existing watershed management plans.

Response: In developing our stepdown HMPs and VSPs across the watershed, we begin with an inventory of existing State, local, and NGO plans for adjoining resources. If we use the CCP as an example, it includes reference and information from national, State, and local plans produced by partners. Our work in developing stepdown plans will incorporate feedback from State and local partners, both from existing plans and from active engagement in these planning processes. Goal 4 of the CCP specifically outlines the importance of partnering with State, local, and NGOs within the watershed.

Comment: The modeling work completed by Dr. Kevin McGarigal at the University of Massachusetts as part of the Massachusetts Critical Linkages project is emphasized by one commenter. They suggest this modeling work confirmed the importance of habitat connectivity, and identified areas where habitat restoration work would have the largest impact.

Response: We are familiar with Dr. McGarigal's work both in Massachusetts and more broadly in the watershed. The tools produced at the University of Massachusetts are used by the Refuge to affirm existing planning and management efforts, including the role the identified CPA and CFAs would play in connecting existing conserved lands. Future efforts within Massachusetts will employ these tools to ensure refuge restoration efforts are targeted in appropriate locations.

Comment: A commenter notes that the "uncertainty over how much habitat will be managed" has led to a "strong undercurrent of distrust of the federal government."

Response: We recognize that the planning process that governs national wildlife refuges can be confusing at times, particularly with a refuge as complex as Conte Refuge. The refuge CCP is the first step in a multi-step process of identifying and outlining the amount of commercial forest management that is appropriate to benefit our focal species. Following on the CCP is a required publicly-vetted Habitat Management Plan (HMP) where habitat management is spelled out in more detail. It is in the HMP, written on a per-CFA basis where we intend to identify how many acres will be subject to commercial forest management, the kinds of management we will prescribe, and the timing of those treatments. To further clarify, any use of commercial contractors to conduct forest management is driven solely by the habitat needs of identified focal species.

Comment: It was suggested that "USFWS should make use of its unique position to address issues that cross State lines such as invasive plants and wildlife-habitat connectivity."

Response: We agree with this commenter. Indeed, the design of the refuge allows us to enter partnerships and apply management actions on spatial scales that cross administrative boundaries. Invasive species management and the identification and protection of wildlife-habitat corridors are two areas of critical importance where this landscape scale approach is applied. Our discussion in chapter 4 of the CCP includes objective 4.4 which specifically mentions our intent to collaborate with partners in the identification, monitoring and treatment of invasive species throughout the watershed.

Comment: One commenter noted Federal land management agencies have a poor track record of active management of their lands. This commenter noted Federal agencies are at the whim of Congressional budgets, must meet requirements of administrative and complex legislation, and often times are the subject of lawsuits leading to expense per-acre costs of management as compared to private landowners. Easements could achieve wildlife habitat objectives more effectively and efficiently than Federal fee ownership.

Response: We agree with commenters that administrative, budgetary, and legislative requirements placed on Federal agencies who manage forests are often more cumbersome, and therefore more expensive, than

those of private landowners. We also agree that conservation easements may, in some instances, represent a viable option that meets the desires of both the landowner and the refuge. We have recently acquired an approximately 725-acre easement in the Mascoma CFA, and have proposed approximately 35 percent of our future acquisitions be easements (see appendix C, page 42). In order for this to be an effective option, at least two conditions must exist: an easement is desired by the landowner (as opposed to outright fee sale) and the landowner would agree with the anticipated forest management objectives that benefit our focal wildlife species.

Comment: The Vermont Traditions Coalition notes a concern over the emphasis on management for “old forests”. They felt this may negatively impact snowshoe hare populations in the Nulhegan Basin, an important prey species for Canada lynx and a popular game species.

Response: Forest management at the Nulhegan Basin Division will be detailed in a forthcoming Habitat Management Plan. The CCP attempts to provide the reader with the general direction our forest management may take, but does not prescribe the quantity or type of management at a given location. Canada lynx are a federally threatened species and our forest management at Nulhegan Basin and in other areas suitable to lynx will work to create ideal habitat. In some cases, this will include creation of early successional softwood habitats.

Canada lynx represents a single species for which we are responsible. Other species identified in the CCP may require differing forest conditions than lynx. Many of our identified focal species are forest interior nesting birds who often require some component of a mature forest. Our forest management - at the Nulhegan and elsewhere - will combine the creation of early successional habitats with efforts to maintain or create closed canopy conditions for focal species.

Comment: It was noted that our discussion of hardwood and softwood management did not specifically cite the importance of beavers in maintaining hydrological function. The commenter asked us to “research and evaluate the role of beaver as a wetlands management tool to help maintain soil moisture” and to “clarify what has been used on past sites or what might be used on future sites.”

Response: We agree with the commenter that beavers play an integral role in both wetland and swamp management and state this in appendix A CFA discussions where beaver activity is known to occur (e.g., sub-objective 1.1c for the Nulhegan Basin CFA, appendix A, page A-557). Wherever beavers occur, provided they are not negatively impacting infrastructure, our intent is to allow their manipulation of the hydrological regime. Our historical discussion of hardwood and softwood swamps attempted to make general points about the ways they have been altered by humans. Where appropriate, our management efforts within swamps will restore plant species composition and hydrological function to the extent practicable. Site-specific management techniques will be outlined in a much more detailed HMP for each CFA.

Opposition

Comment: A single commenter wrote to suggest fish and wildlife Refuges are natural places and by definition should not be “managed” but rather “protected” unless the “management” is of a nature to erase or reduce previous or current man-made impacts.

Response: New England has seen human occupation for thousands of years. In that time humans have impacted their environment in ways big and small. We discuss this in detail in chapter 2 of the CCP. Further, we are tasked with managing refuge lands to benefit our trust species, identified focal species, and the biological integrity, diversity, and environmental health of ecosystems.

This is all a way of saying ‘natural’ is a complicated word. We agree that Refuge’s can be a place of respite for people and wildlife alike. However, we disagree regarding the need for management. Currently

the Silvio O. Conte NFWR is home to habitats overrun with invasive species; streams restricted by undersized culverts; and forests of simplified structure and composition. Many of these man-made conditions are manageable. Habitats that are judged to be providing appropriate habitat for focal species will be monitored, but there is much work to do to improve wildlife habitat in the Connecticut River watershed.

Comment: A suggestion was made by a commenter that areas set aside for passive management may “serve to support or modify the actively-managed parcels.”

Response: We agree that areas we reserve from active management, whether they be forests or some other ecosystem, can serve as reference or monitoring sites for all practitioners.

Clarifications

Comment: New Hampshire Audubon felt we could improve our discussion of habitat types by identifying States where Woodlands occurred, as well as providing examples of State and Federal resources of concern as they relate to shrub swamps and floodplain forests.

Response: The CCP has been changed to reflect these comments. Refer to the final CCP/EIS chapter 3, under the section entitled “General Habitat Types.”

Comment: One commenter noted the CCP calls for forest management “where appropriate” and asks if our determination of appropriate would be similar to those used by other foresters in the watershed.

Response: Our intent in using the word “appropriate” with regard to active forest management is to recognize that the plan was written with incomplete information in some areas. For example, as we acquire land over the life of the plan we may decide some areas are appropriate and others inappropriate for active forest management. This may be due to ecological reasons (e.g., wet soils, invasive plant infestations, sensitive habitats), economic reasons (e.g., the land was heavily harvested prior to our ownership), or legal reasons (e.g., the selling landowner places an encumbrance on the parcel that removes forest management as an option). While we cannot speak for other foresters in the watershed, we believe our process for identifying appropriate places to manage forests is a sound one and is likely replicated outside of refuge lands. The HMPs we develop for refuge divisions will identify the criteria used to select management areas.

Comment: A commenter noted that many of the management activity descriptions in appendix J lacked site-specific details. The commenter asked: “provide examples...of how management operations specific to individual stands have removed timber in the past, their results, and plans to deal with insect and disease invasions when they occur.” The commenter specifically raised concerns about our description that our management would favor spruce in all stand types.

Response: We appreciate this commenter’s attention to detail. Indeed, the CCP is lacking stand-level details for all of the forests under discussion. The CCP is a landscape-scale plan designed to illustrate four refuge goals: Partnerships, Wildlife and Habitat Management, Education and Outreach, and Recreation at the watershed scale. Discussing wildlife and habitat management goals at the stand-scale is beyond the scope of the document. Each CFA will have an accompanying HMP where smaller-scale investigation of forest conditions will be discussed and management techniques described.

With regard to our emphasis on spruce management, we recognize this as a typo. The text in appendix J has been changed accordingly to reflect our intention to favor softwood species where appropriate.

Wildlife, Fish, and Plant Populations Management (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 32, 45, 60, 82, 83, 90, 102, 109, 119, 122, 128, 166, 167, 179, 180, 215, 223, 237, 249, 252)

General

Comment: We heard from individuals that they would like refuge habitat management to focus on supporting popular game species such as deer, grouse, and rabbit. Another individual wanted to make sure that we managed deer appropriately to ensure the species does not become overpopulated and impact habitats on refuge and adjacent lands.

Response: Managing habitat to support game species is the responsibility of State agencies. The Service has primary legal mandates and Service policies that direct priorities for wildlife and habitat management on refuges. Management mandates include policy and law that: (1) identify refuge purposes, (2) that govern management of refuges and Refuge System resources of concern, and (3) that directs management to achieve biological integrity, diversity, and environmental health on each refuge.

Appendix B provides a detailed description and step by step process on the selection of priority refuge resources of concern. Nevertheless, management for these priority refuge resources on refuge lands will benefit a variety of species including deer, grouse and rabbit. Management for American woodcock, rusty blackbird and chestnut-sided warbler, for example, will provide young forest and shrublands that will be used by the above mentioned game species.

White-tailed deer are managed by State agencies. Refuge divisions are open or are proposed to be open to hunting following State regulations. Hunting is a management tool to maintain healthy deer populations. We will work with State agencies if there is evidence that deer populations are negatively impacting habitats.

Fisheries, Fish Passage, and Aquatic Habitats

Comment: A commenter noted the importance of removing barriers to fish passage within the watershed, whether they are dams or culverts. They suggest the Refuge conduct a culvert assessment and take the lead on replacing those crossings deemed to be a barrier on Refuge lands.

Response: We agree that dams and improperly constructed crossings are a problem throughout the watershed, both on and off refuge-owned lands. The commenter will be pleased to learn the refuge has conducted crossing assessments on some refuge owned lands in the past, and efforts are underway to assess all crossings in the Northeast Region. These surveys are designed to identify and prioritize crossings that are an impediment to aquatic organism passage. We direct the commenter to chapter 4 of the CCP - objective 4.3, which outlines our intent to enter partnerships throughout the watershed to restore and manage aquatic habitats.

Comment: We heard from an individual who would like to see more emphasis in the plan on how the refuge will provide support to restore migratory fish or enhance resident and sport fisheries. This same individual would like to see more narrative and descriptions about how the existing fisheries program that operate within the refuge and river coordinator's office relates to the refuge.

Response: We describe our support for fish and other aquatic species passage and habitat in chapter 4, Objective 4.3—Aquatic Species Protection, Restoration and Management Partnerships. Under this objective, we state that the refuge will work with partners including the Service's Connecticut River Coordinators Program "to develop and implement species recovery plans, species conservation strategies, habitat conservation plans, State wildlife action plans, and other conservation measures with a goal to avoid new species listings. Those measures may include land protection, public use and access management, and invasive species control." We would also "work closely with other Service programs to mobilize agency resources toward coordinated conservation work in the watershed." Under this same objective the refuge will work with partners to "... actively seek funding, and implement on-the-ground

projects and monitoring with the goal to restore and maintain. . . native species (e.g. American shad, eastern brook trout, American eel, sea lamprey, etc.) to their historic range in the watershed.”

Comment: VFWD suggests that the refuge not limit its land acquisition to Eastern Brook Trout Joint Venture (EBTJV) “priority” subwatersheds. They also suggest conducting enhancement and restoration in subwatersheds with reduced or extirpated brook trout populations rather than just conserving.

Response: The EBTJV sub-watershed list will be used to guide management within refuge CFAs. We recognize the importance of working outside refuge CFAs and engaging partners in restoration and enhancement projects. This is mentioned in chapter 5: “Across all alternatives, we would restore and protect key spawning reaches for priority fish species, where feasible, (table 5.30) and would participate with our partners in the Eastern Brook Trout Joint Venture and other partnerships to do so. We recognize, however, the imperative to work with others since refuge lands would not compose an adequate habitat base to independently influence a significant fish population response.” We added information in chapter 5, table 5.3, to better inform the reader of our intent to not only protect aquatic species, but to also manage habitats: “We would continue to work with partners (e.g., Connecticut River Coordinator’s Office, Eastern Brook Trout Joint Venture, etc.) to conserve, restore and enhance aquatic species and their habitats in the Connecticut River mainstem and its tributaries (e.g., land conservation, removing barriers to aquatic organism passage, improving water quality).”

Comment: VFWD suggest only listing Atlantic salmon in the lower parts of the watershed (i.e. up to the Dodge Falls Dam in Ryegate, Vermont) because adult salmon can theoretically return and spawn in these lower reaches. But remove mention of salmon above Dodge Falls Dam, since stocking of this resource no longer occurs.

Response: Thank you for your comment. We removed Atlantic salmon from our list of priority species in CFAs north of Dodge Falls Dam.

Comment: VFWD suggests that the Service have the capacity to perform stream assessments on their own, rather than only relying on partners to do this work.

Response: The staffing chart in appendix H shows that we plan to hire a fisheries biologist to conduct stream assessments, monitor aquatic species, restore habitats, etc. on refuge lands and across the watershed. This person would also be responsible for coordinating and working with our partners on these aquatic projects. Until we hire a fisheries biologist, we will continue to rely heavily on partners to assist with this work, and it is therefore, a strategy in the CCP.

Species and Habitats—General

Comment: We heard from Connecticut Audubon about their concerns with the decline of grassland birds in New England and the Northeast and the importance of the Connecticut river watershed in supporting the northeast metapopulations of these birds. They suggest that the refuge have the flexibility to partner with State and local agencies and NGOs to seize opportunities to protect and restore grassland bird habitat within the watershed as these opportunities arise.

Response: The protection of large intact tracts of grassland habitat is one of the refuges priority resources of concern (see appendix B). The Service has the authority to acquire up to 10% additional acres within Refuge CPAs, which provides the flexibility to protect additional acres, such as those that support grassland habitat, outside refuge CFAs and within CPAs. Appendix C outlines the criteria that would be used to guide the 10% acquisition authority within CPAs. These criteria are designed to support the Service’s Strategic Growth policy (602 FW 5), Conte Refuge’s legislative purposes, and support the *Connect the Connecticut* LCD:

- Contributes to the recovery of federally listed species, including the protection of critical, occupied, or historic habitat for those species.

- Contributes to sustaining populations of migratory birds in decline by protecting breeding, migration, and wintering habitat.
- Contributes to sustaining populations of waterfowl identified as priority species in the North American Waterfowl Management Plan (NAWMP) and Atlantic Coast Joint Venture (ACJV) Implementation Plan.
- Contributes toward the refuge purposes legislated by Congress in the Conte Refuge Act of 1991.
- Facilitates the implementation of the *Connect the Connecticut* LCD project, including the protection of core areas or their connectors within the existing 1.8 million-acre conservation mosaic.

Comment: We heard comments from NH Audubon who recommend that we add rusty blackbird among migratory birds as a resource of conservation concern for all Massachusetts and Connecticut CFAs that include hardwood swamp, shrub swamp, and floodplain forest. They also suggest adding rusty blackbird migration and wintering surveys as CFA inventory and monitoring strategies. NH Audubon also suggests that the Service engage with representatives of the International Rusty Blackbird Working Group regarding potential acquisition targets that would benefit rusty blackbirds within the Quonotuck CFA.

Response: Thank you for your comment. We have added rusty blackbird to forested wetlands, shrub swamps and floodplain forests as you suggest, but with more emphasis on wintering habitat within Massachusetts and Connecticut CFAs. We look forward to working with partners and organizations that can inform our land protection process.

Endangered and Threatened Species

Comment: We heard from a local who lives on the Ashuelot River about concerns with the fluctuating water levels of the Ashuelot River. This individual is surprised that the dwarf wedge mussel, native to the Ashuelot River, requires reliable water depths to survive. They feel that this mussel can tolerate extreme water level changes based on observations of changes in water depths in the river over the last 25 years. They would like to see the river returned to its pristine condition to support aquatic species.

Response: Thank you for your comment. We were unable to find the section in the CCP that suggests dwarf wedgemussel requires reliable water levels. According to the dwarf wedgemussel five-year review summary and evaluation (USFWS 2007), very little research has been done on habitat requirements for this species. Habitat assessments in various rivers within the Connecticut River watershed have found dwarf wedgemussel using a variety of habitat and water depths (McLain and Ross 2005, Nedeau 2002, 2005, 2006a, and 2006b). The 1993 Recovery Plan identifies four primary factors responsible for the decline of the dwarf wedgemussel: impoundments, pollution, riverbank alteration, and siltation (USFWS 1993). There is evidence that severe flooding will destroy occupied habitat resulting in the loss of dwarf wedgemussels (USFWS 2007). Based on this information, the dwarf wedgemussel will use a variety of water depths under non-extreme conditions such as flooding.

We would also like to provide habitats that support native aquatic species, and will work with our partners to analyze current available data, and conduct additional assessments, as needed, to inform more detailed management and monitoring strategies for aquatic habitats within the Ashuelot CPA.

Comment: We heard from CTDEEP on the importance for the refuge to collaborate with CTDEEP on the development of comprehensive resource protection, monitoring and management plans for dwarf wedgemussels and puritan tiger beetles in Connecticut. They suggest that additional inventory work should be completed within the first five years of the CCP's implementation in order to better inform land protection priorities and target sites for restoration. They also feel that promoting public awareness of the importance of the CT River to Federal Trust resources and the potential negative impacts of boating and beach activities to these species is essential. They suggest that we increase law enforcement capacity along the entire CT River

mainstem and strategically place interpretive signage at major access points along the CT River to increase on-site awareness of the Refuge's presence to river recreationists, especially the boating community.

Response: Below we address comments by species.

Puritan Tiger Beetles—

The following are strategies under sub-objectives 1.1 and 1.3a in the Dead Man's Swamp Unit and Quonatumuck CFA Fact Sheets in appendix A:

- Work with partners to develop and begin implementation of actions to conserve the existing Puritan tiger beetle metapopulation that includes the Deadmans Swamp unit. This should include identifying potentially suitable sandy beach habitat, land protection options for suitable habitats, actions that will contribute to recovery, and management of Service lands to complement tiger beetle recovery efforts.
- Work with partners to manage beach habitats to benefit Puritan tiger beetles which includes hand-pulling or herbicide application to encroaching vegetation in puritan tiger beetle larval habitat.
- Continue to support puritan tiger beetle research opportunities.
- Work with partners to monitor puritan tiger beetle populations.
- Work with partners to educate the general public about recreational use impacts on puritan tiger beetle populations using outreach, visitor contact, restricted access and other tools, as warranted.
- Partner with CTDEEP and other partners to establish two additional meta-populations as called for in the Recovery Plan.

Dwarf Wedgemussel —

- Work with partners to continue monitoring dwarf wedge mussel populations, and educate adjacent landowners on land use impacts to the species.

For both Species Objectives—

- Work with partners to develop comprehensive resource protection, monitoring and management plans for dwarf wedgemussels and puritan tiger beetles within the CFA boundary.
- In chapter 4 under Objective 4.2 Terrestrial Species Protection, Restoration, and Management Partnerships, we state that we will work with partners “. . . to develop and implement species recovery plans, spotlight action plans, species conservation strategies and targets, habitat conservation plans, State wildlife action plans, and other conservation measures with a goal to avoid new species listings. Those measures may include land protection, public use and access management, and invasive species control.” Priority will be given to federally listed, candidate, and proposed species which includes puritan tiger beetles and dwarf wedgemussels.

Comment: We heard from individuals and organizations that encouraged us to continue to prioritize the protection and restoration of federally endangered and threatened species, since this is one of the refuge's purposes. The Center for Biological Diversity states, “To the extent that small-scale habitat manipulation is needed to advance the conservation of federally listed species, and will not, harm other rare and imperiled species, we are in support of such action on the Refuge.”

Response: We are legally mandated to manage and protect federally listed species. Primary legal mandates and Service policies direct priorities for wildlife and habitat management on refuges, and guide the process for selecting resources of concern. Management mandates include policy and law that: (1) identify refuge purposes, (2) that govern management of refuges and Refuge System resources of concern, and

(3) that directs management to achieve biological integrity, diversity, and environmental health on each refuge.

As you mention in your comment, one of the establishing purposes of the refuge is “to protect species listed as endangered or threatened, or identified as candidates for listing, pursuant to the Endangered Species Act (ESA) of 1973 as amended (16 U.S. 1531 *et seq.*).”

The National Wildlife Refuge System Mission, Goals, and Refuge Purposes Policy (601 FW 1) also provides guidance for resource management on refuges. One of these goals is to “conserve a diversity of fish, wildlife, and plants and their habitats, including species that are endangered or threatened with becoming endangered.”

Comment: We heard from VFWD about their concerns with the lack of management strategies for Canada lynx. They emphasize the importance of following through on the objective written in the CCP that discusses the development of a lynx management plan for northern Vermont and New Hampshire.

Response: The refuge is coordinating with VT and NH State agencies, as well as the USFWS Endangered Species Office to standardize protocols used to monitor lynx populations across both States. We are also participating in a research project that is assessing potential impacts of climate change on carnivore occupancy and snowshoe hare demography along elevational and latitudinal gradients in northern NH and VT. This research will provide relevant information to predict the direct and indirect impacts of climate change on species along the trailing edge of boreal forests in New England. From a lynx conservation perspective, this study will identify if hare populations in the peripheral range meet thresholds for supporting lynx populations in northern VT and NH. Refuge staff and partners involved in this study will use results from this research and climate projections to build predictive maps of potential boreal forest refugia and hare distribution to identify areas that may be important for lynx, marten, and hares in 2050 and 2080. Results will also help inform land management. All of which will be used to develop a lynx management plan for northern Vermont and New Hampshire.

Comment: VFWD would like the CCP to address how the refuge will manage and conserve lands in a way that is mindful to recovery of imperiled bat species and, in particular, northern long-eared bats.

Response: Management of federally listed T&E species, including the northern long-eared bat, are a priority for the refuge. We mention management of bat species within those CFAs where we have population information. See appendix A for specific management and monitoring strategies. Further detail, including management prescriptions, location of management efforts, and how we will implement bat conservation measures, will be provided in each CFA Habitat Management Plan. We will implement the conservation measures that were stipulated in the listing package for the species.

At the watershed scale, we discuss the importance of working with partners to protect and manage for the recovery of Federal endangered and threatened species in chapter 4 under Objective 4.2. The northern long-eared bat is mentioned as a species in need of a coordinated conservation effort. And in chapter 5, we mention that “we will take appropriate management action to help recover any Threatened or Endangered species if new lands acquired are known habitat areas for these species, and such lands are identified as needing protection and management in an approved recovery plan. Such management actions would be taken after appropriate review and consultation with recognized experts and Service approval.”

Comment: VFWD comment that additional information is needed on the critical habitat required for the Jesup's milk-vetch. They suggest expanding the Quonotuck CFA Goal 1: Wildlife and Habitat Conservation Objective 1.2: Non-forested Uplands and Wetlands to include a sub-objective for riverside rock outcrops and ledges which is the sole habitat for the milk vetch.

Response: We are using the NALCC habitat headings for each sub-objective which is linked to the National Vegetation Classification System (NVCS) providing access to spatial data for analysis. Your suggestion to add “riverside rock outcrops and ledges” as a sub-objective under Objective 1.2 makes sense based on the habitat type, but would not fit our current CCP framework, nor would we be able to look at the information spatially. We’ve added this habitat to Objective 1.3 instead, as it is consistent with other CFA sub-objectives, and the habitat is associated with open water.

We changed the Quonotuck sub-objective 1.3a heading to: “Open Water and River Shore.” We also added the following paragraph to the Rationale: “The endangered Jesup’s milk-vetch is restricted to three locations within rocky outcrops and ledges of the Connecticut River in central New Hampshire and Vermont. Jesup’s milk-vetch requires open areas with very little competition from other plants to germinate. This habitat is provided by frequent ice scours and spring flooding.

Native and non-native invasive plants are altering the habitat suitability at all three sites. Intensive invasive species management efforts have been on-going since 1998 and have kept invasive populations at low levels, but long-term management strategies to control or eliminate invasive plants needs to be developed and implemented. Changes in weather patterns including unusual flooding events, lack of ice-scour and drought in recent years may impact Jesup’s milk-vetch reproduction and ability to compete with other species for available habitat. Long-term investigations on impacts from these changes are needed to determine what impacts weather events are having on populations.

Introduction efforts of Jesup’s milkvetch to other locations on the Connecticut River mainstem have occurred intermittently since 2009. One site has proven successful with over 35% survival of planted seedlings the first year, and over 45% of those seedlings producing fruit the second year (Popp personal communication 2016).

Recovery of this species will be a long-term commitment. Efforts include annual monitoring of established and introduced populations, management of invasive plants, continued introduction of new sub-populations, and conservation of all sites.”

We added the following management strategies:

- Work with partners to secure existing Jesup’s milk-vetch populations. Actions may include herbicide and mechanical treatment of encroaching vegetation and monitoring species status using a standardized approach.
- Work with partners to develop a long-term management plan for Jesup’s milk-vetch.
- Support long-term research for Jesup’s milk-vetch including investigations on impacts from climate change and genetic studies.
- Work with partners to establish additional Jesup’s milk-vetch populations on public and conserved lands along the Connecticut River mainstem.

Comment: We heard from VFWD that a correction is needed on the habitat requirements for the Northeastern bulrush.

Response: We changed the rationale in the Putney Mountain Unit Freshwater Marsh Objective to read: “The northeastern bulrush, a wetland plant, occurs in various beaver wetlands within the unit. Large beaver flowages are the primary habitat for the bulrush. This species is federally listed, and has adapted to seasonal water fluctuations. Habitat alterations that change the natural hydrology of a wetland to be consistently wet or dry may have negative consequences for this species. Light availability is known to influence plant growth, reproduction and distribution. Managing forest habitats that often surround beaver wetlands to minimize shade on areas where bulrush populations occur would be an effective management strategy. Biologists are currently monitoring known populations, but more information is

needed on the habitat requirements, reproductive strategy, and genetic variability (U.S. Fish and Wildlife Service 2006).

The Putney Mountain Unit population has fluctuated in the number of plants over the past few years likely due to water fluctuations and competition from other plant species. Continued monitoring of this population will help determine trends and assess threats impacting the species. The refuge will maintain beaver activity and the natural hydrology of wetlands within the Unit, as well as manage adjacent forested habitats to ensure shading does not impact bulrush populations.”

Added additional information to the West River CFA Fact Sheet: “The northeastern bulrush, a wetland plant, occurs within various beaver wetlands in the CFA. This species is federally listed, and has adapted to seasonal water fluctuations. Habitat alterations that change the hydrology of a wetland to be consistently wet or dry may have negative consequences for this species. Biologists are currently monitoring known populations, but more information is needed on the habitat requirements, reproductive strategy, and genetic variability (USFWS 2006). Research and preventing habitat destruction and deterioration of wetland sites where this plant is found are crucial steps to maintaining these northeastern bulrush populations.

The 1993 Recovery Plan for the species called for protection measures such as land acquisition and conservation easements (USFWS 1993). The 5-year review echoed these recommendations, stating that the highest priority actions are to resurveying populations that have not recently been surveyed, securing protection on public and private lands, conducting periodic surveys of populations to determine trends and threats, and implementing management tools to reduce threats and monitor effectiveness of these actions (USFWS 2008).”

Comment: We heard from various individuals who felt that lynx did not need to be protected due to their large home range and adaptability. They felt that restrictions on hunting and trapping to protect lynx was not warranted.

Response: Lynx are listed under the Endangered Species Act, and the refuge has an obligation to protect the species. The presence of pursuit hounds in Canada lynx natal locations is of concern as is the potential pursuit of lynx by hounds. Both could constitute “take” under the Endangered Species Act. We are only requesting user names and phone numbers as a means of continuing these uses without changing the season or methods, while gaining the ability to contact such users should new information related to lynx become available.

Comment: We heard from an individual who supports hunting and trapping on the refuge as a means to manage wildlife populations. He suggests that these uses would benefit lynx by maintaining populations of competing carnivores at low levels. He asks that we use sound wildlife management practices.

Response: Your comment is noted. We plan to keep the Nulhegan Basin Division open to hunting and trapping to maintain healthy wildlife population levels.

Historic, Cultural, and Archaeological Resources (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings)(ID#s 205)

General

Comment: A commenter implies that the Schell Memorial Bridge has historic significance and wants it saved because it provides good access to the Connecticut River. The person notes however that it is likely to be razed.

Response: Although as a Federal agency we conform to the National Historic Preservation Act and other laws governing historic artifacts when contemplating our management actions, our responsibility is limited to those features occurring on refuge lands.

Socioeconomic Impacts (ID#s 1, 4, 32, 67, 70, 77, 82, 99, 103, 109, 114, 139, 141, 157, 167, 176, 183, 188, 197, 214, 220, 222, 223, 226, 232, 237, 245, 261, 263, 265, 267, 271, 277, 281, 293, 294)

Concerns over Proposed Action

Comment: Several individuals and organizations characterized the economic and socioeconomic analysis within the draft CCP/EIS as incomplete and/or incorrect and expressed the need for a more comprehensive analysis of alternatives. The West Fairlee Center Conservation Commission of Vermont, Windmill Hill Pinnacle Association, NHTOA, and other individuals specifically requested:

- Comparison of property taxes paid under Federal Government ownership vs. under private ownership.
- The Federal Government's track record of making PILT/refuge revenue sharing payments.
- Evaluation of differences between tax revenues to towns from property taxes and timber yield/severance taxes of land under Federal ownership with minimal active management vs. privately owned land under the current level of active management.
- Evaluation of economic impacts to local and regional economies (due to proposed change from active management to minimal or no management over large acreage).
- Evaluation of impacts on forest product mills, wood chip power plants, and firewood processors that rely on timber production from these lands.
- Evaluation of specific loss to logging and forestry operation revenue.
- More comprehensive information regarding actual government outreach to rural communities to support the service economy, actual government purchase of conservation and public access easements, etc.
- Comparison of implications of fee vs. easement acquisition.

Response: In appendix I and summarized in chapter 5 of the draft and final plans, 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 5, while there may be some up front 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 a public good, 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 given the unpredictable timing of land acquisition from willing sellers, 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; private landowners retain all their rights of private ownership. Also, the Service would only acquire lands from willing sellers.

As noted in final CCP/EIS, appendix I, the point is made that it is difficult to fully assess the economic and fiscal impacts on towns with this proposal due to the unknowns about location and timing of land acquisition, and knowing what condition the land would be in when it was received. However, we hired Innovative Natural Resource Solutions, LLC to assess two towns in New Hampshire, using the

assumption about a 25% of full entitlement of revenue sharing payments (report available upon request). In this assessment, the tax burden that is transferred due to the estimated deficit between revenue sharing payments and existing tax revenues would be \$0.28 cents per \$1,000 assessed valuation in Surry, New Hampshire and \$0.20 in Columbia, New Hampshire. If we were to achieve full entitlement in the future, the revenue sharing payments would exceed the existing tax revenues. A payment of about 48% of full entitlement would extinguish the deficit in Columbia and a payment of 85% of full entitlement would extinguish the difference in Surry.

We believe our socioeconomic analysis in appendix I is adequate for our proposal. Please see Table 3.7 "Refuge Revenue Sharing Payments to Towns, 2007-2015" for details on historic payments.

Comment: Many individuals, businesses, and organizations note the federalization of land entails severely adverse economic impacts to local communities. These impacts may include a rise in property tax rates, a significant loss of jobs (namely in the timber industry), and great harm done to small town economic development and the local populace from lost property and income tax revenue. Some note small rural areas have no available alternatives to offset the lost tax revenue and have already seen lost jobs because of Conte Refuge existence. Those sharing these beliefs include the Town of Columbia Board of Selectmen, HPP, Inc., G.H. Evarts & Co., Inc., TRORC, Chesterfield, MA Select Board, Vermont Traditions Coalition, Durgin & Crowell Lumber Co., Town of Alstead, NH Board of Selectment, Precision Lumber, Inc., Windmill Hill Pinnacle Association, Town of Canaan, and other individuals.

While some of these commenters acknowledge potential conservation benefits resulting from Refuge expansion, they all believe the economic losses to local citizens are more significant and outweigh the benefits. Many estimates of local losses are quoted, ranging from \$260,000 to \$3,315,200 and varying depending on location.

Response: In appendix I, we explain our economic analysis. Due to the scope and scale of our project, this economic analysis was done on a regional basis and impacts were not assessed for individual towns. We would like to point out that the actual economic impact of land acquisition is quite complex. For example, when we retain land as habitat, it reduces the need for the services each town provides and increases the revenue to local businesses from visitor, staff and refuge purchases. Those effects further mitigate the economic impacts on each town. We also believe that the towns around the refuge will continue to develop, further increasing their tax base. Please see the response to comment directly preceding this for further details.

Regarding impacts on timber industry, while we manage forests for wildlife habitat first and economic benefits are incidental to these efforts, the Service does employ private loggers to harvest timber to meet our wildlife habitat objectives. Therefore, timber harvest and the production of timber products from these properties will continue in some amount. The Service will be responsibly harvesting timber in support of achieving wildlife habitat objectives. The Service will contract with private independent loggers. The Service will also actively work with landowners to promote enrollment in Forest Legacy programs, to protect working forests from ownership fragmentation and conversion to uses other than forestry production and/or wildlife habitat. At present, our split is 97/3 fee/easement ownership. Over the life of the land protection plan, our target split is 65/35. This ratio could vary depending upon landowner preference. Further, easement acquisition by the Service is not the only opportunity for landowner to enroll their land in easement program. Forest Legacy and other conservation opportunities are available. As stated elsewhere in document, the Service considers land enrolled in the farmland protection or forest legacy program protected, requiring no further action by the Service.

Comment: An individual notes that "traditional ownership, part of the area's history, will be lost." She advocates allowing local farmers to rent Federal pastures, and hiring local foresters, loggers, and mills to harvest the land in order to preserve the traditional ownership of the area.

Response: We actively support the enrollment of working farms and working forests into voluntary incentive-based easement programs. We do contract with local loggers when we are harvesting timber to achieve

desired wildlife habitat objectives. Further, we contract with local businesses to achieve a litany of different outcomes on National Wildlife Refuges.

Benefits of Proposed Action

Comment: Some individuals and organizations note the economic benefits of the proposal. Several suggest the additional outdoor recreation locations and services anticipated by the plan would result in an increase in tourism, and in turn benefit local economies.

TNC cited the statistic that for every \$1 of Federal funding appropriated to the Refuge system, an average of \$4.87 is returned to local economies (Banking on Nature 2013). Another individual notes the annual value of sales and output of New Hampshire's forest products industry equals the annual value of sales of New Hampshire's forest-based recreation economy--\$1.4 billion (Northeast State Forester's Association Report 2013).

One individual suggested expanding the Refuge further into Winchester, New Hampshire, as the Refuge "would contribute to the economic development of the tourism industry in this corner of New Hampshire."

Response: Your comment is noted. See appendix I for our detailed economic analysis.

Comment: Some commenters highlighted the environmental benefits that result from the activities of the Conte Refuge. TNC notes, "protecting land for future generations and protecting vital wildlife habitat in strategic locations has a lasting impact on the character and quality of our natural environment."

Response: Your comment is noted.

Refuge Revenue Sharing Payments (ID#s 32, 77, 82, 90, 102, 119, 123, 139, 155, 167, 176, 188, 197, 223, 236, 237, 266, 271, 311)

General

Comment: Many commenters note that refuge revenue sharing payments are not sufficient to offset property tax losses to towns. One points out that losses due to inflation are not addressed and funding for these payments is "at the whim of Congress." The CRWC suggests that this underfunding of refuge revenue sharing "has a direct impact on state expenditures on education funding."

Response: In chapter 2, in the discussion of planning issues, under the section on "Landscape-level Land Resource Protection and Conservation", we acknowledge public concerns about the impacts of Federal ownership removing land from town tax rolls, and how the Refuge Revenue Sharing program is not adequate to replace the property tax revenue losses.

The Federal Government is not required to pay property taxes. However, the Service has a program specifically authorized by the Refuge Revenue Sharing Act of 1935, as amended, under which revenues earned on refuges are collected and then disbursed to local taxing authorities where refuge land is located. These payments are intended to help offset property tax losses in communities due to land acquisition and property ownership by the Service; however, they may be less than the historical property tax levels. This can be an important issue for small towns if payments are reduced under Service ownership, but may be insignificant in towns with larger, more diverse tax bases. In chapter 3, table 3.7, we present the revenue sharing payments made to towns over the last 8 years.

Congress sets the revenue sharing payment rate each year. The maximum rate is approximately three-fourths of one percent of the market value of the property. The Service has no control over what rate Congress sets. Although historically revenue sharing exceeded the corresponding tax revenues generated from private lands, payments in the past decade have fallen considerably. We reappraise lands every 5 years to ensure that payments are based on market value. More information on refuge revenue sharing can be found online at: <https://www.fws.gov/refuges/realty/rrs.html> (accessed December 2016).

As noted in final CCP/EIS, appendix I, the point is made that it is difficult to fully assess the economic and fiscal impacts on towns with this proposal due to the unknowns about location and timing of land acquisition, and knowing what condition the land would be in when it was received. However, we hired Innovative Natural Resource Solutions, LLC to assess two towns in New Hampshire, using the assumption about a 25% of full entitlement of revenue sharing payments (report available upon request). In this assessment, the tax burden that is transferred due to the estimated deficit between revenue sharing payments and existing tax revenues would be \$0.28 cents per \$1,000 assessed valuation in Surry, New Hampshire and \$0.20 in Columbia, New Hampshire. If we were to achieve full entitlement in the future, the revenue sharing payments would exceed the existing tax revenues. A payment of about 48% of full entitlement would extinguish the deficit in Columbia and a payment of 85% of full entitlement would extinguish the difference in Surry.

Comment: The CLLTIA and several other individuals state that “payments in lieu of taxes to towns should be maintained and increased consistent with current tax trends.”

Response: As we note in chapters 3 and 4, the Federal Government does not pay property taxes; however, the refuge system makes annual Refuge Revenue Sharing payments to municipalities in which refuge lands are located. Annual payments are calculated by a formula determined by, and with funds appropriated by, Congress. All of the alternatives would continue those payments in accordance with the law, commensurate with changes in the appraised market value of refuge lands, or new appropriation levels dictated by Congress. Additional towns would be added to the program with future acquisitions. The revenue sharing program is administered nationally by our headquarters office and is beyond the control of the refuge. Please refer to response directly preceding this for further details on Refuge Revenue Sharing payments. Interested individuals can learn more about the Refuge Revenue Sharing Act here: <http://www.fws.gov/refuges/realty/rrs.html>

Climate Change (ID#s 214, 252, 301)

General

Comment: The VFWD notes the importance of and need for more detailed discussion of climate change in the CCP/EIS, as the Connecticut River and tributary floodplains and riparian areas are essential for maintaining climate change resilience.

Response: We recognize the importance of addressing climate change for the Connecticut River watershed. Chapter 2 includes Executive Orders and Secretarial Orders that direct us to address climate change. Chapters 3, 4, and 5 were updated to include the most recent and best available science on climate change, reflecting additional potential impacts of climate change to the Refuge. New and updated sources include the Third National Climate Assessment, the National Fish, Wildlife, and Plants Climate Adaptation Strategy, the IPCC Fifth Assessment Report, and the Northeast Climate Impacts Assessment.

The description of “Actions Common to All Alternatives” and “Actions Common to Alternatives B, C, and D” in chapter 4 provide details and extensive discussion on how managers can promote a refuge more resilient to the impacts of climate change. For example, in the section on adaptive management (found in the former section), we explicitly include maintaining the integrity and function of forest floodplains and wetlands as a method of minimizing negative impacts from climate change. A discussion on developing models and tools to inform management in the face of climate change is included in our description of how alternatives A, B, and C will help meet Goal 1 – Wildlife and Habitat Conservation. For each objective under Goal 1, we have added specific information on the predicted impacts to that objective, including a section on climate change adaptation and the rationale for it addressing floodplains and riparian areas under objective 1.3, Inland Aquatic Habitats.

A discussion of how the effects of climate change will impact Conte Refuge’s ability to execute the CCP and modify the impacts from CCP implementation is included in the section *Climate Change Impacts* in chapter 5, which underwent extensive revision to better comply with the CEQ Final Guidance on how

to consider impacts on and from climate change. As part of this discussion we outline the anticipated changes to climate in the watershed, such as changes to air temperature and CO₂ concentrations, changes in water temperatures, changes in frequency, timing, and amount of annual precipitation, and changes in the rate of sea level rise. These are coupled to the management goals and objectives that could be affected by each component of climate change. The importance of floodplains and riparian areas for long-term ecosystem resilience is discussed in the "Cumulative Impacts" section of chapter 5.

In appendix C "Land Protection Plan," climate change is identified as a threat to the watershed. We also discuss our support for and plans to utilize the Connect the Connecticut LCD, which incorporated climate change resiliency in its conception and modeling. The Service will continue to take steps to adapt our strategies in response to new information and a changing climate and land uses. We specifically structured our Connect the Connecticut Land Conservation Strategy with these anticipated changes in mind. First, the location of conservation focus areas along the mainstem of the Connecticut River was specifically chosen to accommodate the landward migration of the coastal wetland complex to include tidally influenced salt, brackish, and freshwater wetlands. Secondly, the remainder of the CFAs were positioned to facilitate connectivity in area, elevation, latitude, aspect, substrate, and process in an effort to promote redundancy, resiliency, and diversity in the existing conservation mosaic within the watershed.

Comment: The Environmental Protection Agency recommends several climate-change resources, including:

- The relevant work of the U.S. Global Change Research Program 2014 National Climate Assessment, including the chapters on regional impacts, coastal issues, and adaptation.
- National Fish, Wildlife, and Plants Climate Adaptation Strategy.
- 2014 report, "Climate Smart Conservation: Putting Adaptation Principles into Practice."
- NatureServe Climate Change Vulnerability Index.

Response: Thank you for the information.

Comment: An individual commenter notes the CCP does not provide an adequate position on managing lands for climate change effects. She requests that climate change objectives be incorporated into the proposed plan, particularly when looking at long-term rotations for some forest stand management (100 to 130 years).

Response: The Service defines objectives as actions to be accomplished to achieve a desired outcome or goal. Objectives are more specific, and generally more measurable, than goals. In chapter 5, we discuss the potential contribution or mitigation of greenhouse gases in the atmosphere from the Refuge's conserved lands and management actions. However, given the scale of climate change, the Refuge cannot expect to be able to scientifically measure its isolated impact on climate change. Measuring the effects of forest stand management on less than 1000 acres per year would be even more difficult, if not impossible to do with reasonable scientific and statistical confidence given uncertainties in both climate models and the precise timing and location of forest management treatments. For this reason there are no "climate change objectives" included in the CCP.

Current climate adaptation strategies are based on general concepts about what we know confers resilience to landscapes under change. We have incorporated such strategies throughout the plan, including as actions that support our objective of wildlife and habitat conservation in forested uplands and wetlands, citing the scientific literature as appropriate. For example, providing for unfragmented forests with compositional and structural diversity connected by forest corridors is a key component of this objective, and reflects our best scientific understanding about how to manage forests for climate change resilience. Our plan also provides the opportunity to pursue adaptive management, especially in response to localized climate change impacts that cannot be precisely predicted decades into the future.

We agree with the commenter that it is important to discuss potential impacts from climate change and how the Refuge can address them. We did so in the draft CCP and have updated and expanded our analysis in the final CCP.

Chapters 3--5 were updated to include the most recent and best available science on climate change, reflecting additional potential impacts of climate change to the Refuge. New and updated sources include the Third National Climate Assessment, the National Fish, Wildlife, and Plants Climate Adaptation Strategy, the IPCC Fifth Assessment Report, and the Northeast Climate Impacts Assessment.

The description of "Actions Common to All Alternatives" and "Actions Common to Alternatives B, C, and D" in chapter 4 provide details and extensive discussion on how managers can promote a refuge more resilient to the impacts of climate change. For example, in the section on adaptive management (found in the former section), we explicitly include maintaining forest integrity and promoting forest health and diversity as methods of minimizing negative impacts from climate change. A discussion on developing models and tools to inform management in the face of climate change is included in our description of how alternatives A, B, and C will help meet Goal 1 – Wildlife and Habitat Conservation. For each objective under Goal 1, we have added specific information on the predicted impacts to that objective, including a section on climate change adaptation and the rationale for it addressing forests under objective 1.1, Forested Uplands and Wetlands. For example, under objective 1.1 we highlight our plan to support complex, aging forests and develop networks of core and corridor habitats that include a diversity of habitats as components that will contribute to climate resilience.

A discussion of how the effects of climate change will impact Conte Refuge's ability to execute the CCP and modify the impacts from CCP implementation is included in the section *Climate Change Impacts* in chapter 5, which underwent extensive revision to better comply with the CEQ Final Guidance on how to consider impacts on and from climate change. As part of this discussion we outline the anticipated changes to climate in the watershed, such as changes to air temperature and CO₂ concentrations, changes in water temperatures, changes in frequency, timing, and amount of annual precipitation, and changes in the rate of sea level rise. These are coupled to the management goals and objectives that could be affected by each component of climate change. The importance of promoting health, functioning forests for long-term ecosystem resilience is discussed in the "Cumulative Impacts" section of chapter 5.

In appendix C "Land Protection Plan," climate change is identified as a threat to the watershed. We also discuss our support for and plans to utilize the Connect the Connecticut LCD, which incorporated climate change resiliency in its conception and modeling. The Service will continue to take steps to adapt our strategies in response to new information and a changing climate and land uses. We specifically structured our Connect the Connecticut Land Conservation Strategy with these anticipated changes in mind. First, the location of conservation focus areas along the mainstem of the Connecticut River was specifically chosen to accommodate the landward migration of the coastal wetland complex to include tidally influenced salt, brackish, and freshwater wetlands. Secondly, the remainder of the CFAs were positioned to facilitate connectivity in area, elevation, latitude, aspect, substrate, and process in an effort to promote redundancy, resiliency, and diversity in the existing conservation mosaic within the watershed.

Site-specific habitat management strategies will be outlined in future stepdown habitat management plans. These plans will be prepared in consultation with the States, stakeholders, and vetted publicly, consistent with NEPA. Consequently, they will consider the effects of climate change and evaluate cumulative impacts.

Comments on Alternatives—General (ID#s 1, 4, 35, 39, 53, 72, 103, 129, 166, 172, 178, 214, 222, 239, 260, 261, 293, 305)

General

Comment: We received comments from individuals opposed to all four alternatives. Some people did not substantiate a rationale, others expressed opposition to a Federal Government presence. (See "Federal Land Ownership: Opposition" above.) One individual felt our entire focus should be on education and outreach to private landowners. Several individuals introduced a 5th alternative to manage currently owned properties and "refrain from buying any more property." One individual further suggested to "actually shrink it...start to actually downsize it a little bit and maybe give the land back to the state instead of having it under federal

control." Another individual asked why we did not propose an action alternative incorporating CPAs and CFAs under our current acquisition authority.

Response: We agree that education should be a major component of our work, and one of our strategies include education. For those advocating no additional refuge land acquisition or a reduction in refuge land ownership, refer to the final CCP EIS, chapter 4, under the section "Alternatives or Actions Considered but Eliminated From Detailed Study." For the individual asking why we did not propose an alternative incorporating CPAs and CFAs under current acquisition authority, we believe alternative B is responsive to your suggestions.

Comment: We heard from individuals who were concerned with alternatives not being clear as to the distinction between alternatives B, C, and D.

Response: In chapter 4 of the final CCP EIS, under the subheading "Detailed Descriptions of the Alternatives," we strive to distinguish alternatives from one another. While the goals and management objectives are common between alternatives B, C, and D, the magnitude of our ability to meet these goals and objectives differ. In alternative B, we are working within the same acreage allocation already within Service jurisdiction. Alternative D assumes the largest refuge expansion proposal and contains the most reduced developmental proposal. We would be the most limited in active management abilities for alternative D. Alternative C provides the greatest opportunity for a balanced approach to achieving our goals of conservation, recreation, education, partnerships. While alternative D is the largest in acreage and provides the best opportunity to create more robust ecological connections within the watersheds conservation mosaic; our opportunities for recreation, education, and partnerships are more limited. Alternative A is also limited in all four of these areas given the size and distribution of the original special focus areas outlined in the 1995 EIS and master plan. While alternatives B and C have very similar objectives and strategies, alternative C provides twice the opportunity to make strategic and sustainable contributions towards our stated goals.

Alternative A (ID#s 39, 43, 44, 47, 87, 113, 222, 226, 232, 236, 240, 266, 280, 292, 293)

Support for Alternative A in Full

Comment: Some commenters who support alternative A state this alternative is the most financially sound. They note it minimizes loss of tax revenue to towns or employment in the private sector, and ensures refuge management and budget is not spread too thin (as may occur in other alternatives). Several commenters also note the lack of trust in FWS to "focus on the full mandate of the Conte" in general, but particularly under other alternatives.

Response: Your comment is noted.

Comment: One commenter notes "Everything seems to be working. The process doesn't seem to be broke, and I don't see any reason to change any of that." Other commenters agree that maintenance of the current plan and acreage is best.

Response: Your comment is noted.

Comment: Some commenters support alternative A due to a belief that the onus of responsibility should rely more on "private landowners and community non-profit organizations. Stewardship should be encouraged, not mandated, through partnership projects as well as education at the grassroots level." The NHTOA believes "current management (Alternative A) achieves this through its use of cooperative landowner agreements/working forest conservation easements."

Response: Your comment is noted.

Support for Alternative A with Modifications

Comment: The NHTOA supports alternative A but suggest it include a “zero expansion” policy, rather than the current policy of seeking additional land within the approved refuge acquisition boundary.

Response: In chapter 4, “Alternatives or Actions Considered but Eliminated from Detailed Study,” we discuss this suggestion and why we eliminated it from detailed study.

Alternative B (ID#s 7, 39, 44, 102, 119, 127, 172, 205, 250, 251, 267, 278, 286)

Support for Alternative B in Full

Comment: The CRWC, WHPA, MDCR, and other commenters expressed support for improved management of existing lands without acquisition of new lands under alternative B. One individual describes it as a “good compromise.” The MDCR appreciates that alternative B will continue to recognize several specific areas of ecological and recreational importance.

Response: Your comment is noted.

Comment: New Hampshire Department of Resources and Economic Development, Parks and Recreation, Bureau of Trails supported the protection of existing established snowmobile trails of State and regional importance, and additional recreational opportunities such as ADA-accessible trails and hiking trails.

Response: Your comment is noted.

Support for Alternative B with Modifications

Comment: The Connecticut River Joint Commissions Mt. Ascutney Subcommittee supports alternative B and encourages increased partnership with TransCanada, existing watershed and other conservation groups to inform and expand their capacity to conduct habitat improvement activities and public/landowner outreach and education.

Response: Your comment is noted.

Opposed to Alternative B

Comment: The New Hampshire Farm Bureau opposes proposed alternative B, especially the expansion of the Refuge's approved acquisition authority. The commenter notes concern with the impact on farm and forest land management activities in the watershed.

Response: Your comment is noted. However, we have and will continue to actively promote the enrollment of working farms and working forests in farm and forest land protection programs. We further describe our support in chapter 4 “Actions Common to All Alternatives” under “Agricultural Lands Protection, Including Working Farms and Forests.”

Alternative C (ID#s 3, 10, 15, 18, 31, 39, 43, 44, 45, 60, 64, 77, 78, 79, 83, 88, 90, 91, 97, 99, 101, 116, 117, 119, 120, 122, 132, 133, 137, 138, 139, 147, 148, 152, 158, 160, 161, 172, 174, 175, 180, 182, 183, 191, 198, 200, 204, 212, 213, 216, 217, 220, 225, 245, 246, 250, 251, 252, 262, 264, 265, 269, 271, 274, 276, 278, 279, 281, 282, 290, 296, 303, 311, 313, 314)

Support for Alternative C in Full

Comment: Several commenters express their support for alternative C in full for a variety of reasons. The New England Forestry Foundation and other commenters support alternative C, stating the protection of environmentally significant land and the responsible use of forest resources are furthered by this plan.

One individual notes the CCP is “based on a great deal of research, time and effort,” and they “trust their judgment as to which alternative should be followed.”

Many recreational benefits were addressed in comments, such as hunting, fishing, and snowmobiling. Enhanced trail access was cited by commenters, as well. Commenters noted alternative C protects against overdevelopment and affords wildlife, water quality, and watershed protection.

Some commenters note that alternative C affords a good balance of resource protection, management, and public use. One individual noted alternative C is in favor of opening the Peterson Unit to public access, which he supports. Audubon Society of New Hampshire believe alternative C represents a more effective strategy for protecting the watershed than other alternatives.

Commenters noted alternative C protects and restores a variety of habitats, including floodplain and riparian areas. A variety of wildlife species were cited by commenters. Previous governmental success stories (such as the Mascoma River being cleaner today than in the 1950s or 1960s) were noted.

Farmington River Watershed, Mascoma River Local Advisory Committee, Massachusetts Audubon, the Hanover Conservancy, Audubon Connecticut, Canaan Conservation Commission, the Selectboard of the Town of Brighton, Mattabeseck Audubon Society, Audubon Society of New Hampshire, the Town of Bloomfield Connecticut's Conservation Energy and Environment Committee (CEEC), Biocitizen School of Environmental Philosophy, SCI, the four chapters of the Nature Conservancy representing the Connecticut River, VFWD, MDCR, ARLAC, and others all support alternative C.

Response: Your comments are noted.

Support for Alternative C with Modifications

Comment: An individual commenter supports alternative C, but suggests the land acquisition policy as laid out in alternative D is superior and advocates for its use.

Response: Your comment is noted. Our Regional Director has the authority to blend aspects of the four alternatives we evaluated in detail. We will share this suggestion with the Regional Director.

Comment: The Connecticut River Joint Commissions Mt. Ascutney Subcommittee supports alternative C, but without an increase in Federal land ownership. The Subcommittee rather suggests focusing on conservation easements to private landowners to enable continued productive use of land when compatible with habitat management objectives.

Response: Your comment is noted. Our Regional Director has the authority to blend aspects of the four alternatives we evaluated in detail. We will share this suggestion with the Regional Director.

Comment: An individual supports alternative C with the addition of more emphasis on enhancing fish access to native habitats.

Response: Removing barriers to fish passage is a priority to the Northeast Region, including the Refuge. In chapter 4, under goal 4, we describe partnerships we hope to engage to address this issue.

Comment: Audubon Connecticut, Winchester Conservation Commission, and several other commenters support alternative C, but suggest incorporating the “acreage flexibility” of alternative D. Audubon Connecticut notes the presence of an acreage cap does not make sense, and the boundaries should be determined solely based on ecological and potential additional values related to the six priority public uses. Important Bird Areas are suggested as one potential basis for these expansions. Winchester Conservation Commission suggests expansions specifically into Winchester and Richmond.

Response: Your comment is noted. Our Regional Director has the authority to blend aspects of the four alternatives we evaluated in detail. The Regional Director will be made aware of this suggestion.

We recognize the significance of IBAs and took them into consideration when developing our CPAs and CFAs. Please notice our adjustments to CPAs and CFAs in proximity to IBAs. We made other adjustments to the Sprague Brook Conservation Partnership Area. Please see appendix C "Land Protection Plan" for a detailed description of our boundary delineation decision making process under the preferred alternative.

Comment: Kestrel Land Trust supports alternative C and suggests adding more partner conservation focus areas in the area between the Fort River and Mount Holyoke Range, or working with landowners who want to conserve farmland in that same area. The Land Trust further supports the Mill River expansion and Dead Branch expansion.

Response: We recognize the importance of working farms and forests and describe our support in chapter 4, "Actions Common to All Alternatives." While we did not expand the Fort River or Mill River CPAs or CFAs, we look forward to working with our partners to affect conservation action in the area.

Comment: The Town of Randolph, NH, Conservation Commission generally favors alternative C, with the following suggested changes:

- Designating the stretch of the Presidential Rail Trail from Route 115 A in Jefferson to Airport Road in Whitefield as wheelchair-accessible.
- Support the connecting trail from Mud Pond trailhead to Little Cherry Pond trail, but only for non-motorized winter recreational uses (cross-country skiing, snowshoeing, and hiking) and not for summer use.
- Oppose hunting of bobcat and crows.
- Oppose all nighttime hunting on the refuge, both because it is incompatible with other nighttime uses and because it facilitates poaching.

Response: We appreciate your comment and attention to detail. We will be developing a visitor services stepdown plan that will address these topics in the future. Regarding hunting, the hunt programs will be consistent with State regulations. There are no current plans to deviate from this approach. Please see our Hunting compatibility determination in appendix D for further details.

Comment: The Connecticut Chapter of Delta Waterfowl generally supports alternative C and suggests USFWS explore ways to get critical information out to a broader set of users and potential partners about scheduling and holding working meetings and public meetings. They note the willingness of their State Chapter to help facilitate and participate in this process.

Response: We appreciate your offer of assistance. In chapter 4 goal 4 we discuss our outreach and collaboration efforts across our various programs. We look forward to collaborating with you on future outreach efforts as we begin implementation of the approved plan.

Comment: The Jefferson Conservation Commission supports alternative C but is opposed to the purchase of commercial forests in the Pondicherry Conservation Focus Area and prefers conservation easements instead.

Response: We recognize the importance of working farms and forests. In chapter 4, under "Actions Common to All Alternatives," we state our support for conserving working forests through voluntary incentive programs. We support easements as a means of acquiring the minimum interest necessary to protect our

Federal trust resources. Once enrolled in these voluntary landowner incentive programs, the Service considers that land conserved and feels no further conservation action is necessary. We estimated a 65/35 split of fee/easement acquisition, though this may vary depending on landowner preference. This is also detailed in our Land Protection Plan in appendix C.

Comment: One individual supports alternative C with more focus on backcountry-like experiences, as exist in alternative D.

Response: Your comment is noted. Our Regional Director has the authority to blend aspects of the four alternatives we evaluated in detail. The Regional Director will be made aware of this suggestion.

Comment: The Connecticut River Gateway Commission prefers alternative C regarding management proposals but suggests incorporating alternative D's CFA boundaries for both the Salmon River and Whalebone Cove Focus Areas.

Response: We adopted alternative D for Salmon River CFA and expanded Salmon River CPA. We did not change boundaries for Whalebone Cove CFAs. Please refer to appendix C "Land Protection Plan" for a description of our boundary delineation process, and the sections of this appendix specific to Salmon River and Whalebone Cove CFAs/CPAs.

Comment: CRWC is "not fixedly opposed to Alternative C but feel that that choice could exacerbate an already prevalent feeling about the insensitivity of the Federal Government to local town property tax issues. Indeed, with a renewed commitment to refuge revenue sharing CRWC would be an enthusiastic supporter of Alternative C."

Response: Your comment is noted.

Opposed to Alternative C

Comment: Cersosimo Lumber Company, the New Hampshire Farm Bureau, Town of Canaan Board of Selectmen, and other commenters expressed opposition to alternative C based on adverse economic impacts to small towns and businesses, and the inability of the Service to effectively purchase and manage newly acquired lands.

Response: Your comment is noted. Please refer to our discussions on "Socioeconomic Impacts" and "Refuge Revenue Sharing Payments" above for more details.

Comment: One individual voiced a concern with alternative C regarding potential adverse effects to habitats and wildlife resulting from the proposed additional visitor facilities.

Response: The only facilities or infrastructures we are proposing under alternative C is one potential trail within each division, and potential soft boat launches where appropriate. Given the amount of land that will be conserved relative to what we view as minimal infrastructure to concentrate public use, this is a small tradeoff. The potential trails and soft boat landings contribute to our mission to protect resources while also providing for the use and enjoyment of refuge lands where appropriate by the American people.

Alternative D (ID#s 16, 31, 36, 40, 41, 43, 44, 59, 68, 90, 99, 125, 131, 136, 140, 162, 172, 184, 206, 215, 221, 223, 224, 229, 233, 258, 268, 271, 275, 283, 284, 311, 314, 315, 317)

Support for Alternative D in Full

Comment: Commenters expressed support for alternative D for several reasons. One commenter specifically cited avoiding cruelty to wildlife from trophy hunting and supporting the protection of land, water, flora, and fauna. Another commenter notes alternative D would allow for the greatest scope of valuable habitat

to be acquired, which is necessary before any education, recreation, and partnerships may be developed. Several commenters echo these sentiments in favor of the most land preservation possible while it remains undeveloped.

Protect Our Wildlife Vermont (The Humane Society of the United States) believes alternative D is best for protecting wildlife. One individual notes this alternative best serves our goals of mitigating climate change and forest fragmentation, and the restoration of New England's old growth forests. Several commenters state alternative D is best at promoting natural ecological functions and processes. Eightmile River Watershed Committee favors alternative D to preserve large forest blocks that provide critical habitat for wildlife. Haddam Neck, the Vermont Chapter of the Sierra Club, Middlesex Land Trust, Inc., Salmon River Watershed Partnership, and other commenters also favor alternative D.

Response: Your comments are noted.

Support for Alternative D with Modifications

Comment: The Vermont Humane Federation and other commenters support alternative D, but with a no-trapping provision within the Nulhegan Basin Division.

Response: Your comment is noted.

Comment: The Massachusetts Sierra Club, Connecticut Yankee Conservation Project, and Center for Biological Diversity prefer a combination of alternatives D and C, where alternative D's greater size and protection of natural processes is present in conjunction with alternative C's visitor facilities plan and coordination with local, volunteer education, law enforcement, and stewardship efforts.

Response: Your comment is noted.

Opposed to Alternative D

Comment: VAST, the New Hampshire Farm Bureau, Vermont Traditions Coalition, Town of Canaan Board of Selectmen, and other commenters expressed opposition to alternative D as it would preclude important contributors to local economies like snowmobiling and active habitat management. The Vermont Traditions Coalition notes that alternative D would eliminate the vast majority of public access, traditional uses, and "will deplete wildlife populations due to banning most habitat management and timber cutting."

Response: Your comment is noted.

CPAs/CFAs (*Note: comments on a specific CPA, CFA, or Refuge unit, are noted below under their respective headings) (ID#s 41, 83, 90, 183, 210, 245, 252, 262, 281, 90, 101, 121, 180, 183, 210, 252, 257, 306)

General

Comment: We received many comments suggesting specific changes to CPA and CFA boundaries. Most of these comments requested that we expand the size of our proposed areas to include certain geographic areas of interest.

Response: The remainder of this section provides our responses to comments made about specific CPA or CFA. However, we have a single response that addresses many of the specific comments raised. In order to minimize redundancy, we present it here.

In the final plan, we made only a few changes to CPA and CFA boundaries, which we believe, could be characterized as minor in nature. In the final plan, we updated our refuge-owned acres to be current as of February 2016 and we used an updated conserved lands layer (TNC Secured Lands, 2014, Gap Status

1, 2, 3 and 39). Minor changes were made to CFA and CPA acreages as a result of those updates. Our overall target acquisition acreage increased by only 41 acres from the draft plan.

Our principle response to those who suggested boundary changes is that we changed how the target acquisition acreage would be distributed. In response to comments, we are now requesting authority to acquire 90% of our target acreage, on average, within CFAs, and the remaining 10% of acreage in the surrounding CPA. The 10% authority would adhere to our willing seller only policy and based on the same priority criteria we used for CFAs. We believe the shift to 90% in CFAs, on average, better reflects future opportunities based on our willing seller only policy, expected land use changes, actions taken by our conservation partners, and landowner preferences to retain their property or sell to someone else. Given that the 10% is not defined in discrete boundaries, we will notify abutting landowners, and coordinate with the State and local municipalities before acquiring any interest in land.

Comment: Massachusetts Audubon, the Nature Conservancy, and other individuals are supportive of the concept of CFAs and CPAs, as they protect the biological diversity and resiliency of ecosystems within the watershed and maximize efficiency and conservation effectiveness. TNC further notes that CFAs and CPAs capture important targets identified by their Connecticut River Program. Vermont Department of Fish and Wildlife supports the creation of CPAs but notes disappointment in the apparent minor role played by federally listed plants in the design of the CFAs.

Response: Your comment is noted.

Comment: The Nature Conservancy suggests the CCP would “benefit by more definition as to the anticipated role(s) of USFWS in the CPAs.” They further ask:

- Will USFWS acquire land or conservation easements in the CPAs?
- What other types of technical assistance, financial assistance, or other support will USFWS offer to partners and landowners in CPAs?

Response: In appendix C, we describe the anticipated role of USFWS within CFAs and CPAs. In response to your questions: yes, USFWS will acquire land and conservation easements in the CPAs. In CPAs we view our role to facilitate and leverage Federal funds and grant programs including the voluntary landowner incentive programs.

Comment: The Connecticut River Joint Commissions Upper Valley Subcommittee states a need for a clearer distinction between CPAs and CFAs in the narrative, summary tables, and maps. Any changes proposed to CPAs need to be clearly shown and explained.

Response: Appendix C provides our detailed discussion on the distinction between CPAs and CFAs. See specific area discussions below for changes made between draft and final plans.

Comment: The Nature Conservancy suggests the addition of a CFA or CPA which includes ecologically significant floodplains identified by the Conservancy along the Scantic River in East Windsor and Enfield, in coordination with the recommendations of CTDEEP.

Response: The primary criterion for acquiring land within the Quonotuck is floodplain forest protection. This is described in Appendices A and C. In addition, several other CFAs along the Connecticut River mainstem will afford floodplain forest protection. For example, Whalebone Cove, Scantic, Pyquag, Mill River, and Fort River CFAs all include priority floodplain forests identified by the Nature Conservancy.

Comment: Audubon Connecticut feels that when IBAs overlap with CPAs, the entire IBA should be included in the CPA to facilitate habitat protection and stewardship of Important Bird Areas. They provided maps with suggested expansions of the Farmington River, Salmon River, and Whalebone Cove CPAs.

Response: We recognize the significance of IBAs and took them into consideration when developing our CPAs and CFAs. Please notice our adjustments to CPAs and CFAs in proximity to IBAs.

Comment: An individual noted the presence of their land included in alternative B adjacent to Quarry Hill Road in Haddam Neck, CT. They believe this depiction improperly implies agreement with a limitation on their property rights and requested a change to the map and plan.

Response: Owning land within a CPA and/or CFA has no impact on property rights or what a landowner decides to do with their property, if anything. Rather, it affords those property owners access to special assistance and/or options that may not be as readily available to other property owners.

Comment: Several comments related to CFAs more broadly. Commenters desired maximum flexibility for the Service to acquire lands anywhere within a CPA; such action would gain the support of CTDEEP within the Maromas CPA.

CTDEEP reflected that while the concept of CFAs has value for biological and administrative purposes, such a land conservation strategy fails to account for smaller areas of significant conservation value and furthermore limits the flexibility necessary to acquire these lands on short notice. In addition, the acreage cap within CFAs limits the ability for “adaptive conservation” necessary to meet CTDEEP’s identified conservation goals.

Response: In the final CCP/EIS we propose that on average we would acquire 90% of the targeted acreage within a CFA and the remaining 10% would be within the surrounding CPA. Our strategy, reasoning, and rationale is explained in appendix C (Land Protection Plan).

In the final CCP/EIS chapter 4, under our description of alternative B, under “Actions Common to Alternatives B, C, and D,” and within appendix C (Land Protection Plan), we describe how CFAs were delineated. The most detailed description can be found in appendix C as to what criteria were used to delineate and refine CFAs.

Comment: The Vermont Chapter of TNC advocated for additional consideration of underrepresented biophysical features in our land conservation strategy – specifically the ecologically significant bedrock types as exemplified by the Waits River Formation. According to TNC, this area’s acid buffering capacity provides habitat for calcareous fens, supports ginseng and other rare herbs and orchids, and favors sugar maple-dominated forests that provide superior habitat for migratory birds. The comment noted further that a Cornell Ornithology lab study (Hames et al. 2002) found calcium soils to be a potentially limiting factor for wood thrush, one of our priority species. As a compromise, they suggested reducing our acquisition of acidic bedrock formations that are already partially conserved by the State of Vermont and through conservation easements, as occurs in the White River and Ottauquechee CFAs and the southern portion of the West River CFA and correspondingly increase the size and orientation of the Ompompanoosuc CFA to encompass a portion of the Waits River Formation within the Taylor Valley forest block.

Response: Between the draft and final CCP/EIS, we did not change boundaries for Ompompanoosuc, White River, and Ottauquechee CFAs and CPAs. We adjusted West River CPA boundaries to add the adjacent grassy brook area to the east to include a population of northeastern bulrush. While we did not change the CFA, about half of Taylor Valley forest block is within the Ompompanoosuc CPA.

Should willing sellers become available, we will evaluate parcels in the Taylor Valley forest block. The remaining 10% authority may provide opportunities to acquire the suggested habitat within the surrounding CPA. In the final CCP/EIS we propose that on average we would acquire 90% of the targeted acreage within a CFA and the remaining 10% would be within the surrounding CPA. Our strategy, reasoning, and rationale is explained in appendix C (Land Protection Plan). While we recognize

the significance for geophysical diversity in light of climate change, our priorities for acquisition are described in appendix C in the LPP and are not necessarily based on geophysical features.

Comment: The VFWD appreciated the inclusion of ecological justifications for the corresponding CFAs, but advocated for a more detailed description of the process used to determine CFA boundaries.

Response: We refer the VFWD to the final CCP/EIS appendix C “Land Protection Plan” and chapter 4, under our description of alternative B, under “Actions Common to Alternatives B, C, and D.”

Quonatuck CFA (ID#s 40, 102, 119, 180, 183, 245, 252, 262, 281)

Species and Habitats

Comment: Several agencies and organizations shared an appreciation for the inclusion of the proposed Quonatuck CFA in the draft CCP and had a desire that it be included in the alternative ultimately selected. The Connecticut River Watershed Council's rationale was based on the importance of the Connecticut River's shoreline – as a wildlife corridor; via contributing large woody material to the river; and by providing shade for the immediate shoreline and aiding the reduction of thermal gain. Vermont Fish and Wildlife Department wanted to see greater emphasis on the Quonatuck CFA given that the refuge was conceived to conserve the Connecticut River's important ecological values.

Response: We appreciate the support for the Quonatuck CFA. While we do not rank the CFAs in any priority order, we agree that conserving lands within the Quonatuck CFA, whether by the Service or by other conservation partners, is essential given the many critical resources that would benefit and the array of ecosystem services the river main stem and its tributaries provide.

Comment: The Connecticut River Joint Commissions advocated protecting the remaining floodplain forests and wetlands along the mainstem Connecticut River.

Response: Your comment is noted and consistent with the criteria used to define the Quonatuck CFA. The Service will seek to protect and restore functioning floodplain forests and associated wetland habitat. In appendix A, under our overview for Quonatuck, we state that floodplain forest protection is a high priority for that CFA.

Comment: The Nature Conservancy had several comments about species and habitats within the Quonatuck CFA, based on their own research of floodplain forests on the Connecticut River mainstem. They suggest:

- identifying the historical period used as a reference for restoration, and suggest using the best-condition nearby occurrences of the habitat type to be restored may be a better reference.
- maintaining an early successional state by periodic brush cutting on the fertile alluvial soils in the valley can quickly lead to dominance by invasive shrubs and other non-native plants. TNC is concerned that floodplain succession is driven by floods and associated geomorphic change, unlike succession in upland forests driven by gap dynamics. Standard management techniques of upland forests may fail when applied to floodplain forests because the floodplain trees are adapted to germinating in fresh sediments on bars rather than in the forest understory or in windthrow canopy areas.
- Statements about the need to manage for more berry producing shrubs to support the fall migration are less well-supported in the literature. In the Conservancy study of floodplain forests, they observed that berry producing bird-dispersed woody plant species are abundant in the Connecticut River Valley landscapes.
- Removing black locust as invasive plant management priority and recommend adding Norway maple, Japanese knotweed and Japanese stiltgrass.

- Recommend replacing statements about increasing edges and gaps to promote berry producing shrubs for fall migrants with a statement about the need for research that identifies the factors associated with bird population declines and that future management of the refuge will be in accordance with those findings.

Removing the term “naturally occurring” from page A-20, second paragraph, as they are not aware of any naturally occurring grasslands along the Connecticut River.

Response: Your comment is noted and consistent with the criteria used to define the Quonotuck CFA. The Service will seek to protect and restore functioning floodplain forests and associated wetland habitat. In appendix A, under our overview for Quonotuck, we state that floodplain forest protection is a high priority for that CFA. Our detailed Habitat Management Plans will be developed as soon as we have manageable units. That planning process will be NEPA-compliant and we look forward to involving the public in development of those plans.

Boundary Delineation

Comment: We received several comments related to delineation of the Quonotuck CFA. The Vermont Fish and Wildlife Department wanted us to include mapping of not only the actual river, but the more specific areas described in the draft CCP as conservation targets. Along these lines, CTDEEP suggested use of The Nature Conservancy's priority floodplain designation and the “Connect the Connecticut” joint effort of the North Atlantic Landscape Conservation Cooperative. In addition to floodplains and wetlands, they noted the importance of including areas important to federally listed dwarf wedgemussel and puritan tiger beetles. They also recommended extending the CFA's boundary to include the entire river segment in Farmington or at least the segment within the Farmington River CPA. One individual recommended the area known as the “Floating Meadows,” a freshwater tidal wetlands at the confluence of the Coginchaug and Mattabesset Rivers be included in the Quonotuck CFA.

The Nature Conservancy suggests Quonotuck CFA boundary should encompass all the riparian areas along the Connecticut River mainstem from valley wall to valley wall except for areas permanently cut off from the river by engineered structures such as paved roads, railways, and levees. They recommend the primary focus for Quonotuck should be the floodplain areas most connected to the river.

MA DFW suggests the boundaries are not clear and would like a more accurate delineation of where the boundary is to ensure their agency and the Service are coordinating land acquisition efforts. To avoid working at cross-purposes, they request regular land acquisition meetings be conducted to “keep our mutual interests moving forward.”

Response: While we did not adjust the boundary of the Quonotuck CFA, we wish to point out it is an approximation of where we would intend to work with partners to achieve our objectives. By design, the Quonotuck CFA is not delineated down to the parcel level. As we describe in appendix A for this CFA, it is focused on conserving floodplain forests and wetlands, as well as tidal (salt, brackish, and freshwater) wetlands, and those areas supporting threatened and endangered species. We would seek to protect these habitats where they currently occur; where they can be restored, and/or whether they are projected to migrate into the future due to climate change. We would particularly focus on conserving ownerships that include river frontage. TNC's priority floodplain forests, and existing and potential habitat for dwarf wedge mussel and Puritan tiger beetle, as well as habitat for Jesups milkvetch, are included.

With regard to MA DFW's request for regular coordination meetings to discuss land protection, we included the following statement in chapter 4, goal 4, objective 4.1:

“Refuge staff would work in close cooperation with Federal and State agencies, land trusts, and other conservation partners, to foster a climate of cooperation and shared goals when pursuing land protection. In particular, we would ensure close coordination with State agencies by holding regular land acquisition coordination meetings to keep mutual agency interests moving forward and to avoid duplicative efforts.”

Specific Comments on CPAs/CFAs in Connecticut (ID#s 9, 30, 59, 61, 90, 117, 162, 180, 183, 209, 221, 245, 259, 262, 272, 281, 288, 303, 313, 315, 316, 317)

Farmington River CFA (proposed; Connecticut)

Comment: Farmington River Watershed Association offers their candidacy as a potential partner for several of the Plan's objectives and management strategies:

- Maintaining forested buffers and aquatic habitat in the Farming River CFA
- Stream crossing surveys (FRWA has been assessing culverts and other stream crossing structures in the watershed for several years)
- Monitoring of coliform bacteria, water temperature, and benthic macroinvertebrates.
- Environmental Education in partnership with both FRWA and Farming River Coordinating Committee (FRCC)
- Environmental Interpretation in partnership with both FRWA and Farming River Coordinating Committee (FRCC)
- Identification and water quality evaluations of high-quality headwater streams

They further suggest Sandy Brook Conservation Corridor map and Sandy Brook Natural Area Preserve Management Plan as potential online resources.

Response: Your comment is noted. We look forward to working with FRWA in the future.

Comment: CTDEEP recommends that first priority be given to protecting Sandy Brook, from the mouth of the Still River to the Massachusetts State line. This is a high-quality cold water stream that supports native brook trout and conditions will only be enhanced once fish passage is provided at the Collinsville dams. DEEP's proposed CFA includes numerous high ranking parcels (including two "Top 20" parcels (NB-11 and 19). The agency would support alternative D's land conservation proposal for this CFA. Connecticut Audubon supports CTDEEP's proposal.

Response: Between the draft and final CCP/EIS, we did not adjust boundaries for the Farmington River CFA, but did adjust the CPA boundary to account for the creation of adjacent Muddy Brook CPA. Much of Sandy Brook is within the Farmington River CPA.

Under the remaining 10% authority described in the "CFAs/CPAs – General" section above, opportunities to acquire the suggested habitat may be possible should willing sellers become available in the surrounding Farmington River CPA. While we recognize the significance for geophysical diversity in light of climate change, our priorities for acquisition are described in appendix C in the LPP and are not necessarily based on geophysical features.

Farmington River CPA

Comment: The Nature Conservancy is pleased to note the Farmington River CPA includes the significant tributary systems identified as important to the health of the Connecticut River watershed.

Response: Your comment is noted.

Comment: Audubon Connecticut, CTDEEP, and the Lower Farmington River and Salmon Brook Wild and Scenic Study Committee recommend including the “donut hole” exclusion area within Farmington River CPA to comprise areas suggested by the DEEP core team. These areas would provide high quality forest habitat and would account for key fisheries needs. Audubon Connecticut notes the particular importance of area bounded by Routes 4 and 202 South of the currently proposed CPA.

The Lower Farmington River and Salmon Brook Wild and Scenic Study Committee further request that the segment of river between the confluence of the Farmington River and Punch Brook in Burlington to the beginning of the CPA in Simsbury be included as a linear CPA, if possible, and that as much of the area surrounding this stretch of river as possible be given CPA status. They also request inclusion among the Partner groups in the CCP/EIS.

Response: We believe we addressed these concerns in our adjustment to Farmington River CPA and the creation of Muddy Brook CPA and CFA. The lower reaches of the Farmington River are part of the Quonotuck CFA.

Under the remaining 10% authority described in the “CFAs/CPAs – General” section above, opportunities to acquire the suggested habitat may be possible should willing sellers become available in the surrounding CPAs.

Comment: The Town of Simsbury Conservation Commission suggests the remainder of their town be included in the Farmington River / Salmon Brook CPA as they are under congressional consideration for designation as Wild and Scenic Rivers and areas of great conservation importance.

Response: Salmon Brook is contained within the Farmington River CPA. Please note our adjustments to the Farmington River CPA.

Comment: The Nature Conservancy suggests an expansion of Farmington River CPA's boundary to include the Stony Brook floodplains in Suffield and East Granby that have some of the best examples of the *Quercus palustris* floodplain forest type in the watershed.

Response: Please see our maps for the Farmington River CPA, Muddy Brook CPA, and Quonotuck CFA.

Maromas CFA (proposed; Connecticut)

Comment: We received comments from a resident and the Middlesex Land Trust advocating that these lands, under pressure of continuing development, be conserved. The acquisition of this unfragmented forest will protect “a haven for wildlife and migrating birds” and tie together existing protected parcels including the Shailor Ledges Preserve and Cockaponset State Forest.

Response: Your comment is noted.

Comment: A commenter noted that ability to hike the area's section of the New England National Scenic Trail provides an antidote to Nature Deficit Disorder.

Response: Your comment is noted, and in chapter 4, under goal 3, objective 3.4 we propose a strategy for working cooperatively with others to facilitate regional trail connections (including the New England National Scenic Trail) to encourage quality nature based outdoor experiences.

Comment: Audubon Connecticut suggested an expansion of this CFA across the river to the north to encompass the high quality aquatic resources and forests offering quality stopover habitat for migratory birds.

Response: Between the draft and final CCP/EIS, we did not change boundaries for the Maromas CFA. However, expansions of Salmon River CFA, Salmon River CPA and the existing authority within Quonotuck CFA, the Service has opportunities to acquire the described habitat under the 10% authority described above.

Under this remaining 10% authority described in the "CFAs/CPAs – General" section above, opportunities to acquire the suggested habitat may be possible should willing sellers become available in the surrounding CPAs.

Comment: A commenter provided an updated map of the CFA showing open space properties already conserved by the city of Middletown and others.

Response: Your comment is noted. Though additional conserved lands on a local basis may exist, we used TNC's 2014 conserved lands gap status 1, 2, 3, 39 as a consistent watershed-scale mapping standard to assess protected lands.

Comment: Our overall CFA acreage limitation has caused CTDEEP to withhold its support for this CFA based on their belief that this area is not as highly threatened in the near term or as biologically significant in terms of the number of priority refuge resources of concern supported when compared to other CFAs proposed by the Department. This relates especially to those areas proposed that are not included in our preferred alternative, most notably Podunk River/Strong Road CFA/CPA.

Response: We feel Maromas CFA is important as evidenced by the Connect the Connecticut LCD information and the Bueller et al.'s migratory bird stopover study. (See appendix C for additional details on the importance of migratory bird stopover habitat.) Maromas is important alone and as a key component to greater regional conservation efforts such as Salmon River CFA, Whalebone Cove CFA, and Meshomasie Highlands.

Maromas CPA

No comments were recorded or changes made.

Muddy Brook CPA/CFA

In response to comments from CTDEEP, we replaced Salmon Brook CFA with Muddy Brook CPA and CFA.

Pyquag CFA (proposed; Connecticut)

Comment: Connecticut Audubon recommended expanding the proposed CFA to the south across the river to include floodplain agricultural lands known as "Great Meadows," that offer much potential for grassland bird habitat. The Middlesex Land Trust supported addition of the floodplains associated with the Pyquag, as suggested by TNC and supported by Audubon Connecticut.

Response: As part of the Quonotuck CFA, the Service plans to protect and restore a network of functioning floodplain habitats. In addition to habitat protected in the Pyquag, some of your interests would be accommodated in the Quonotuck CFA. Otherwise there was no change to the boundaries of Pyquag CFA.

Comment: The Connecticut Chapter of The Nature Conservancy has worked to identify ecologically significant floodplains throughout the watershed. They and other commenters noted a close alignment of these areas with our proposed CFA.

Response: Your comment is noted.

Comment: The Great Meadows Conservation Trust noted the absence of several important areas within our proposed CFA (e.g., meadows surrounding Wethersfield Cove, South Glastonbury/Nayaug meadows, and floodplain in the Elm Street area of Wethersfield) and advocated for an expansion to include the entirety of the floodplain associated with the “Great Meadows of the Connecticut River”. They recommended defining the floodplain area and CFA boundary as depicted in the 2008 FEMA Flood Rate Insurance Map or the Stream Channel Encroachment Line.

Response: The Service used the FEMA information and a variety of other sources to define the Quonotuck as well as other mainstem CFAs in an effort to hone in on priority floodplain areas.

Salmon Brook CFA (proposed; Connecticut)

Comment: The Farmington River Watershed Association noted the existence of a recent management plan (<http://lowerfarmingtonriver.org/about/themanagement-plan/>) containing recommendations similar to ours and a biodiversity study (http://frwa.org/publications/biodiversity_report_final.pdf) containing detailed information for the subject area.

Response: Your comment is noted.

Comment: The Farmington River Watershed Association noted their interest as a potential partner within this CFA, in particularly in collaboration with the Lower Salmon Brook Wild & Scenic Committee.

Response: The Service looks forward to collaborating with partners in support of shared goals and objectives within the watershed; especially in the CPAs.

Comment: CTDEEP suggested an expansion of the CFA at the mouth of Salmon Brook in East Granby, given its species and habitat diversity and value as foraging habitat for bats, habitat for diadromous fish, and potential for grassland bird conservation. The area of greatest importance to American eel, herring, alewife, Atlantic salmon, and sea lamprey should extend from the mouth of Salmon Brook up both the East and West Branches to the gorges in North Granby (Silver Street) and West Granby (just above confluence with Beach Brook). The value to salmon, brook trout, and eels extends above the gorge on the East Branch all the way to Massachusetts including Belden Brook, and to Wright Brook on the West Branch.

Audubon Connecticut echoed this comment and recommended expansion of this CFA to include all areas contained within the CTDEEP proposal – in order to encompass areas important to grassland birds. In addition, they suggest expanding the proposed CFA to the west include the nearby critical habitat polygons.

Response: Much of the areas in the Salmon Brook CFA are now generally located within the Farmington CFA. This is because much of what was within the Salmon Brook CFA was already conserved. In the surrounding Farmington River CPA, the Service proposes to invest about 10% of our land protection capacity, as described above in the “CFAs/CPAs – General” section. As is the case with CFAs, interest in land will only be acquired from willing sellers.

Comment: The Farmington River Watershed Association noted the existence of federally endangered dwarf wedgemussel upstream (i.e., south) of the Salmon Brook CPA, and therefore recommended a southward expansion of the CPA. (We assume the commenter refers to the Salmon Brook CFA, as there is no Salmon Brook CPA.)

Another commenter was “disappointed, surprised, and puzzled” to note the absence of Salmon Brook and its Granby tributaries in the CFA delineation, given the inclusion of nearby waters and CTDEEP’s rating of these waters as among the premier cold-water fisheries in the State. They therefore requested a re-evaluation and reconsideration of our proposal.

Response: These areas are in the Farmington River CPA. See response above.

Salmon Brook CPA

No comments were recorded. Note that this CPA has been removed from the final plan.

Salmon River CFA (existing; Connecticut)

Comment: We received many comments supporting this CFA; many of whom also recommended an expansion.

For instance, CTDEEP would support inclusion of the areas indicated in our alternative D, either by the Service or other partners to “fill in the gaps” by acquiring undeveloped parcels arrayed between existing conserved lands with the goal of enhancing habitat connectivity and facilitating species movement. Audubon Connecticut emphasized the value of these additional unfragmented forest lands to nesting wood thrush and other forest-dependent birds, while the Connecticut River Gateway Commission echoed support for acquiring the additional lands identified in alternative D because “protecting the mouth of the Salmon River and Salmon Cove without protecting the rest of the Salmon River would be counterproductive”. Additional local organizations, such as Salmon River Watershed Partnership and Middlesex Land Trust, also supported the land conservation attributes of alternative D.

An organization called The Haddam Neck Spirit suggested an expanded boundary to include land on both sides of Ague Spring Road up to and including the ridgeline. This would facilitate contiguity with George Dudley Seymour and Hurd State Parks. They contend that such an expansion would enhance long-term survival of the threatened and endangered species we've listed in table A.11, which may otherwise be threatened by increasing suburban development.

The Connecticut Yankee Conservation Project appreciated the past conservation efforts and advocated for continuing dialogue with Eversource Energy to ultimately acquire the remaining portion of the 582-acre former Connecticut Yankee power plant site while being thoughtful about proper storage of the spent nuclear fuel until it is shipped to a permanent repository. The Connecticut River Gateway Commission also recommended acquisition of the Connecticut Yankee site given its key role in the area's habitat conservation matrix as well as, its cultural resource attributes (i.e., Venture Smith homestead and Native American sites).

Response: We increased both the Salmon River CFA incorporating our alternative D boundary and we added a subwatershed to the northwest portion of Salmon River CPA in response to interest from the State and Audubon Connecticut.

These areas are generally located within the Salmon River CPA and some are specifically located within the CFA. In each case, the Service could provide some conservation alternatives that could accomplish the outcomes desired by the commenters. As we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Salmon River CPA

Comment: The Nature Conservancy is pleased to note the Salmon River CPA captures the entire watershed of the Salmon River, which has been identified as important to the health of the Connecticut River watershed.

Response: Your comment is noted.

Comment: Audubon Connecticut strongly recommends the Salmon River CPA be expanded to the northwest to include the critical forested resources of the Meshomasic Forest, which provides habitat for many important bird species. They provide maps outlining Audubon's suggestions in red, CTDEEP's suggestions in blue.

Response: Please see our discussion under the Salmon River CFA above.

Scantic River CFA (proposed; Connecticut)

Comment: Several organizations supported our proposed land conservation efforts in this area, and many advocated for an enlarged CFA. Audubon Connecticut recommended expansion of the proposed CFA boundary to include those areas proposed by CTDEEP that are omitted from our alternative C. Such additional areas include habitats with high potential to support grassland and other early successional birds. The Middlesex Land Trust suggested the addition of the Scantic River floodplains given their value to neotropical migrant and nesting songbirds. The Nature Conservancy wished to see the addition of the confluences of the Farmington, Scantic, and Podunk Rivers given their high species richness and diversity associated with these small river floodplain forest types.

In a plea for action, CTDEEP pointed out that this region, particularly in the vicinity of Strong Road, contains some of the most imperiled natural resources in the State (including rare plant communities and a great blue heron rookery) and the highest level of threat due to development, yet lacks adequate resources to fund conservation measures. They also brought to our attention the presence of a dwarf wedgemussel population in the Podunk River, one-mile from our proposed CFA boundary.

Response: We did not adjust the Scantic CFA boundary, but added a CPA based on State and others comments. These areas discussed by commenters are generally located within the Scantic or Farmington River CPA, or in the Quonatumuck or Scantic CFA. In each case, the Service could provide some conservation alternatives that could accomplish the outcomes desired by the commenters. As we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Whalebone Cove CFA (existing; Connecticut)

Comment: As with our other proposed CFAs in Connecticut, several organizations supported our land conservation intentions and proposed an expansion of the final CFA boundary. CTDEEP advocated for the acquisition boundary represented by alternative D in order to enhance habitat connectivity and facilitate species movement. Audubon Connecticut echoed this sentiment as it relates to the protection of aquatic and marsh resources, as well as, high quality interior forest habitat that supports nesting wood thrush, cerulean warbler, and other forest interior-dependent birds. They recommended a further expansion to the east and northeast as shown on their attached map. The Eightmile River Wild & Scenic Coordinating Committee favored alternative D in order to protect remaining habitat blocks and create a network of corridors among the system of conserved lands. The Connecticut River Gateway Commission's advocacy for alternative D was based on The Nature Conservancy's goal of linking protected forest lands across five towns within a watershed that has qualified for "wild and scenic river status". They also noted the aesthetic value of the area to people on the river as well as travelers across the I-91 bridge.

Response: The Service did not expand the Whalebone Cove CPA or CFA. However, as we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Whalebone Cove CPA

Comment: The Nature Conservancy is pleased to note the Whalebone Cove CPA captures the entire watershed of the Eightmile Rivers.

Response: Your comment is noted.

Dead Man's Swamp Unit (existing; Connecticut)

No comments were recorded or changes made.

Roger Tory Peterson Unit (existing; Connecticut)

Comment: Several commenters had specific suggestions for recreation and partnerships on Roger Tory Peterson Unit. An individual whose family donated lands to the Old Lyme Land Trust desired a trail connecting the Lohman, Buck, Twining parcels to the Peterson Unit by securing an access easement across the intervening Giessen and Holt properties. Creating such a path along the northwest branch of the Lieutenant River “would honor Roger Tory Peterson’s legacy.”

Another commenter raised several questions about our intended public use of the property. They noted that the site is “an eyesore featuring what appears to be an abandoned building surrounded by uncleared woodlands”, but could be improved with our dedicated actions. This individual offered several suggestions including: relocating the access point to Saunders Hollow Road with associated adequate parking, install a natural greenscape to obscure the view of Route 156, consider similar project on Saunders Hollow Road, and prepare a site development plan to accommodate our anticipated public use programming.

A commenter reported rumors of our constructing a viewing platform along the loop nature trail near the Lieutenant River headwaters. They are opposed because such a structure would offer little nature-viewing value to visitors while exposing a number of houses and thereby sacrificing the “illusion of seclusion” present currently.

A commenter disagreed with our characterization of the Peterson Unit as being located in a “rural portion of Old Lyme”. They noted that while this area was rural when first acquired by Mr. Peterson in the 1905s it is now a residential area located along a busy State highway.

An individual noted that our maps contained red blocks signifying “development” along the steep slope of Saunders Hollow Road. They commented that there is not development currently in that location, and efforts to modify the slope for the purpose of accessing the tract and trail would be misguided.

We received a suggestion that a parking access could be developed near the York House and that it would be important to explain the risks of Lyme disease to visitors.

A commenter shared concerns that given our intention to manage this area without the presence of Service staff, the success of our public offerings is dependent on a non-existent Friends group that would staff the proposed visitor contact station. This person also emphasized that site development and program expenses would be dependent upon funds raised by the Friends group. They requested a better description of our involvement at the unit and our expectations of a Friends group.

Response: These proposals are thoughtful and warrant additional attention before final plans are made. We will review them again as part of our visitor services stepdown plan. That planning effort will be in consultation with the State, partners, and other stakeholders and will be vetted in a public process consistent with NEPA.

Specific Comments on CFAs/CPAs in Massachusetts (ID#s 18, 83, 116, 147, 174, 183)

Dead Branch CFA (existing; Massachusetts)

Comment: A commenter suggested that the Westfield watershed would be a great place to divert anadromous fish “considering what’s going on in Holyoke and up at Turner’s Falls” where the fish “don’t seem to be up over those dams.”

Response: Your comment is noted. While a major initiative of the Service is to improve aquatic species passage, especially anadromous fish, we do not anticipate creating infrastructure to “divert fish” from one place to another.

Comment: An individual commended the Dead Branch as an outdoor classroom and that the entire valley can provide an educational resource.

Response: Your comment is noted.

Comment: We received a comment in support of our role to assist with coordinating actions by the US Army Corps of Engineers, MA DEP and others – and bringing greater attention to the CFA.

Response: Your comment is noted. As stated previously, we will strive to facilitate conservation, education, recreation, and partnership activities within the watershed and do so in a way that does not duplicate or compete with work that others are doing. Rather, it is our intent to be “value added” by providing capacity to overcome gaps.

Comment: The Nature Conservancy advocated for an expansion of the CFA to the south to incorporate more land in Huntington. Such lands are identified as BioMap2 Core Habitat and Critical Natural Landscape – recognized as critical for biodiversity. They note that these lands also rank highly for climate change resilience.

Response: We did not adjust boundaries for Dead Branch CPA or CFA. However, as we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Fort River CFA (existing; Massachusetts)

Comment: A commenter noted the presence of barn swallows in the former horse stable buildings. They requested that if we are to demolish these structures, alternative nesting structures be provided.

Response: Our plans are to take down the stables, but that is coupled with encouraging barn swallows to use another suitable structure on the refuge.

Comment: A commenter shared their appreciation for the universal access trail and noted “it is a great asset to the area, and provides us with many scenic views, while still protecting wildlife habitat.”

Response: Your comment is noted. We hope to offer similar opportunities elsewhere on the refuge, provided we have the funding and have completed the appropriate NEPA-compliant process, including public involvement.

We did not adjust the CFA or CPA boundary for Fort River Division.

Fort River CPA

No comments were recorded or changes made.

Mill River CFA (existing; Massachusetts)

Comment: Massachusetts Audubon Society considers their Arcadia Wildlife Sanctuary and surrounding lands to be ecologically valuable properties and has prioritized the lands in this area for protection. They look forward to working with us in this effort.

Response: Your comment is noted.

Comment: We received a comment that a portion of runway associated with the Northampton Airport is included within the proposed acquisition area as part of alternative C. They recommended that we either alter our boundary to exclude the runway from our acquisition plans or state that we will continue operation of the runway in its entirety.

Response: We agree and the runway was excluded in the final CCP/EIS. We did not otherwise make any changes to the Mill River CFA or CPA boundary.

Comment: While noting the Refuge's "excellent record of allowing farming", one commenter wanted us to ensure the continuation of farming – and not solely for hay. They suggested options such as: purchasing lands only within 200-feet of the Connecticut River and allowing farming pursuant to a conservation easement landward of that line – or purchasing agricultural lands outright and leasing the ability to farm without restrictions that would reduce yields.

Response: Farming is an important part of this watershed-based working landscape. It is our desire to facilitate the voluntary enrollment of working farms and forests into programs designed to sustain them. Once enrolled, the Service considers the land protected and we would take no further action to seek acquisition.

Mill River CPA

No comments were recorded or changes made.

Westfield River CFA (existing; Massachusetts)

Comment: The Nature Conservancy shared an interest in expanding this CFA's boundary to the south in order to include parcels in Becket and Chester that contain frontage on the West Branch of the Westfield River, the longest free-flowing river in the State and one in which we already own land.

Response: We did not adjust the CPA or CFA boundary for Westfield River. However, as we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Westfield River CPA

Comment: The Nature Conservancy is pleased to note the area covered by Westfield River CPA encompasses many important areas that connect the Dead Branch and Westfield River CFAs. The Conservancy further notes the availability of solid data to prioritize corridors if there is future interest in maintaining landscape connectivity.

Response: Your comment is noted, and we look forward to cooperating on future projects.

Honeypot Road Wetlands Unit (existing; Massachusetts)

No comments were recorded or changes made.

Mount Toby Unit (existing; Massachusetts)

No comments were recorded or changes made.

Mount Tom Unit (existing; Massachusetts)

No comments were recorded or changes made.

Third Island Unit (existing; Massachusetts)

No comments were recorded or changes made.

Wissatinnewag Unit (existing; Massachusetts)

No comments were recorded or changes made.

Specific Comments on CFAs/CPAs in New Hampshire (ID#s 86, 88, 135, 182, 183, 213, 220, 265, 277, 279, 282, 294, 306, 308)

Ashuelot River CFA (proposed; New Hampshire)

Comment: We received support from The Nature Conservancy for inclusion of this CFA in our draft plan. They noted its value in creating important ecological connections and that it contains critical habitat for migratory birds, deer, and bear – and also provides important resources for people and the New Hampshire economy.

A resident commented that lax enforcement of laws intended to protect the environment has resulted in degradation of important wildlife habitats – specifically what the commenter identifies as the “highest ranked wildlife habitat corridor” connecting the Connecticut River with New Hampshire’s interior uplands for a 70 mile river segment. Its special status therefore supports the CFA’s conservation for use by all.

Yet -another commenter reflected on the need to protect more of the Connecticut River’s tributaries, which our proposal will achieve in the Ashuelot watershed.

Response: The area is generally located in the Ashuelot River CPA. However, as we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Comment: The Nature Conservancy recommended expanding the CFA’s southern boundary to incorporate the entire Surry Mountain ridgeline and Sturtevant Brook and its watershed.

Response: We did not adjust the boundary for the Ashuelot River CPA or CFA. However, as we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Ashuelot River CPA

Comment: A resident of the Ashuelot River Watershed notes the abundance of wildlife that existed in the (unspecified) past, such as hundreds of frogs, meadowlarks, dozens of yellow finches and bluebirds, etc., compared to their decreased numbers and/or absence today. He expresses his desire to see more conservation efforts in this area, “because we need it.”

Response: Your comment is noted.

Blueberry Swamp CFA (existing; New Hampshire)

Comment: We received a comment from The Nature Conservancy recommending expansion in the vicinity of Stoddard and Marshall Roads. This would allow a more complete connection to existing conservation lands and include both sides of Bungy Road. They provided a map with two options.

Response: In Blueberry Swamp, we reduced the CPA to remove a subwatershed that did not directly influence the swamp but made no changes to the CFA. However, as we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Comment: A Columbia Selectman referenced a map we shared at a meeting in November 2007. That map displayed the entire Connecticut River watershed to provide some context to a specific land acquisition proposal. The Selectman misinterpreted the boundary map and assumed that we intend to eventually “attempt to take all of the land to the Connecticut River that is shown in your 2007 map.” The commenter

went on to note that of the town's 33,315 in taxable acres, 30,600 acres are already enrolled in New Hampshire's current use program.

Response: We hope the final plan makes obvious the areas we have targeted for Service acquisition from willing sellers only. The comment on taxable acres is duly noted. Please refer to the section titled "Socioeconomic Impacts" above for additional information.

Blueberry Swamp CPA

Comment: The Nature Conservancy notes the addition to the CPA includes important additional streams rated as highly resilient to impacts of climate change. It also includes an important structural pathway for wildlife movement just south of Lyman Brook, which better captures areas that scored highly for terrestrial resilience to impacts of climate change.

Response: Your comment is noted.

Mascoma River CFA (existing; New Hampshire)

Comment: Comments received were supportive of our proposed efforts – ranging from conserving habitats important to migratory birds and wide-ranging mammals to providing an area to recreate and appreciate wildlife.

Response: Your comment is noted.

Comment: The Hanover Conservancy expressed an interest in serving as a local conservation partner. They also shared a list of parcels that they have conserved within and adjacent to the CFA. They further noted the similarity with our considerations in evaluating conservation factors. More specifically they:

- Requested notification should we acquire Map 14, Lot 27, and asked that we avoid forest management activities that would disrupt access to their property.
- Recommend Map 13 Lot 54, and Map 14 Lots 1, 2, and 40, be included in our proposed acquisition area.
- Requested that we proceed cautiously when contemplating future forest openings in order to guard against colonization by invasive plants and asked whether openings created on adjoining lands would fulfill our objectives.
- Encouraged us to allow hunting on lands acquired.
- Supported hiking trails in the Moose Mountain region of Hanover; specifically connecting their McKinley tract with their Tunis Brook Mill parcel.
- Offered to partner with us in natural resource and cultural interpretive activities.
- Asked that we identify and protect cultural resources during habitat management activities.

Response: Your comments are noted. The Service looks forward to partnering with the Hanover Conservancy and having more detailed discussions about how to best move forward with our shared goals and objectives. Generally, we promote hunting and hiking along with other priority public uses. Further, we are required by law to protect cultural resources under the stewardship of the Service.

Comment: One commenter offered specific suggestions, such as establishing a cross-country ski trail at the Mascoma Division from Dartmouth's Winslow Ledge land east to NH 118 in Dorchester. Further, they recommended creating a hiking trail from Hanover's Moose Mountain northeast to Rumney's Rattlesnake

Mountain. The commenter suggested that these trails would not significantly impact wildlife or our habitat management goals and that similar activity already occurs in and adjacent to the proposed Mascoma Division.

Response: These suggestions, along with other public access related proposals, will be addressed as part of a specific visitor services stepdown plan. That planning effort will be in consultation with the State, partners, and other stakeholders and will be vetted in a public process consistent with NEPA.

Mascoma River CPA

Comment: The Nature Conservancy notes the CPA connection to the Connecticut River includes Grant Brook, which rates highly in relative resilience and may facilitate connections to already protected land. They suggest one area of expansion on the southwest boundary to include important wetlands and oxbow complexes along the Mascoma River, Lovejoy Brook, and two State Wildlife Management Areas.

Response: We added a subwatershed to the Mascoma River CPA in response to public comments but made no changes to the CFA. However, as we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Pondicherry CFA (existing; New Hampshire)

Comment: The Friends of Pondicherry recommended we place a stronger emphasis on the State's wildlife action plan rather than the more geographically expansive Bird Conservation Region 14 goals. They further suggested we update our list of Priority Refuge Species of Concern by using the 2015 New Hampshire Wildlife Action Plan rather than the 2006 edition given changes made to the priority species list. They specifically asked us to consider adding the following to our list of Priority Refuge Species of Concern:

- Marsh Wren
- Mourning Warbler
- Snowshoe Hare

Response: Thank you for your comment. The USFWS Region 5 Biological Team has provided refuges with specific guidelines on identifying and selecting priority refuge resources of concern. Please see appendix B which provides details on this process. We strongly feel that it is important that we are consistent in the process of selecting our resources of concern. Various individuals and groups will have their own opinions as to which species should be on our priority list. We do not disagree that the species you've suggested would be worthwhile considerations. They do not meet various criteria required under our selection process (e.g. are not a high conservation concern species in selected plans). These species will benefit from management of refuge resources of concern.

We were remiss to not mention the importance of Moorhen Marsh and Hazen Pond to marsh wren, and have added this information to the freshwater marsh rationale. We also included a strategy "to investigate the need for a beaver baffle in areas where high water levels are impacting marsh vegetation." We recognize that snowshoe hare are an important species in the boreal forest. They are an important prey species for numerous predators, including Canada lynx which are federally threatened and a species of concern for the refuge. Habitat management for snowshoe hare will be integrated into a region wide lynx management plan. Our proposal to manage habitats for rusty blackbird populations, and increase the structural diversity within the forests of Pondicherry, will benefit snowshoe hare. We also propose to manage habitats for woodcock, which will benefit other early successional species including mourning and chestnut-sided warblers.

Comment: The Jefferson Conservation Commission and Friends of Pondicherry express a general concern that we maintain a greater number of the old fields on the division, suggesting an increase of 15 acres, before they advance into forest growth. Such actions would benefit woodcock, monarch butterflies, and bumblebees among other early successional species. They noted that map A-516 does not display all of the fields that are currently mowed or brush hogged. They can provide a map showing the full extent of mowed fields and recommend others whose maintenance would benefit wildlife habitat needs.

The Friends also advocated mowing as a means to improve habitat for ruffed grouse and woodcock along Airport and Hazen Roads – an area of former pasture that could be enhanced for game species with periodic mowing. In their opinion, periodically mowing the fields along Slide Brook Trail would benefit wildlife, as well as, scenic and historic landscape values.

Response: We will continue to maintain old fields on the Division until we conduct a detailed habitat analysis associated with drafting a Habitat Management Plan (HMP) for the Division. We have not maintained a few fields due to concerns with spreading invasive plants, but we would welcome suggestions from the Friends of Pondicherry and the Jefferson Conservation Commission. A final decision on the location and number of fields maintained at Pondicherry will be made based on other habitat management objectives and priorities that develop during the HMP process. We would encourage the Friends and Conservation Commission to actively engage with us when we draft the Pondicherry HMP.

Comment: The Friends of Pondicherry noted disappointment that the Pondicherry Division would remain unstaffed. They suggested we build a maintenance facility associated the Ayling Road government quarters and staff the facility to improve relations with the local community. They also advocated an expansion of our Youth Conservation Corps from six to eight members and from six to eight weeks in duration.

The Friends encouraged planting native plants for the benefit of wildlife, such as milkweed along appropriate segments of the rail trail to benefit monarch butterflies.

Response: We agree that having dedicated staffing at Pondicherry year round would be ideal for the reasons you state; however, we must balance staffing, operations, and maintenance needs across the Conte Refuge. We do not envision additional staffing or having a permanent staff presence in the near future. We wish to point out that the Conte Refuge staff are located primarily in Sunderland, Massachusetts, and Brunswick Vermont, but serve all refuge divisions. There are many things we must balance as we decide on where to prioritize our resources. We evaluate those priorities on an annual basis once we know our funding levels. The partnership we have the Friends of Pondicherry is incredibly valuable in helping us work towards our goals on this division. We will continue to look for funding, partners, volunteers, to supplement the limited resources that we have. We look forward to continuing the important relationship we have with the Friends group.

Comment: The Jefferson Conservation Commission favored multiple efforts related to environmental education, outreach, and interpretation throughout the community, such as engaging local schools in field-based classes, public interpretation of the area's natural and cultural history, and learning more about the division's natural communities. More specifically, they requested that we educate anglers, kayakers, and canoeists to avoid loon nests on Cherry Pond.

Response: We agree that additional education and outreach efforts are desirable and afford opportunities to potentially mitigate impacts on wildlife.

Comment: The Friends of Pondicherry found our proposal for science and technical outreach (objective 2.4) inadequate – it does not include the commitment to science that they expect, including our support of projects with refuge funds. For instance, they would like to see greater research-based collaboration with local universities and science-based organizations at the division. The Friends advocated for the gathering of survey data regarding species such as bog lemming, rusty blackbird, and burbot, among others. Finally,

they suggested that we reach out to institutions such as Plymouth State University or Dartmouth College to perform paleo-ecological studies as Cherry, Little Cherry, and Mud Ponds.

Response: We support compatible research as described in chapter 4, goal 4 objective 4.6. We will consider all research proposals that would help inform our refuge purposes, mission, and goals, especially in those instances where a proposed action could impact positively or negatively on those and other species mentioned by the commenter.

Comment: The Friends of Pondicherry advocated for several interpretive items. They favored installation of interpretive panels on the Mud Pond Trail boardwalk given its high use and the ability to share the fen's unusual characteristics with the visiting public. They noted that this trail should also contain the appropriate universal access signage. Additionally, they requested publication of a bird checklist and division brochure, similar to those available at the Nulhegan Basin Division. Finally, they suggested an interpretive panel for the Slide Brook Trail to commemorate its significance to the 1885 Cherry Mountain landslide.

Response: As noted above, we will evaluate interpretive infrastructure during development of the Visitor Services Plan. We recognize this is a very popular, accessible trail and we would like to continue to facilitate and enhance its use.

We further agree that a no hunting zone should be evaluated for the area surrounding the Mud Pond trail. The evaluation will help inform our development of a Visitor Services Plan.

Lastly, the Visitor Services Plan will address any interpretive panels desired at the Slide Brook trailhead. We would point out that an interpretive panel that discusses the 1885 Cherry Mountain landslide currently exists directly across NH 115 on US Forest Service land. It is our general intention during the Visitor Services Plan to minimize signage across the division to retain its character.

Comment: We received several comments from the Randolph and Jefferson Conservation Commissions and Friends of Pondicherry involving recreational opportunities. Trail-related comments included:

- General support for maintaining existing trails, boardwalks, viewing platforms, and fields throughout the division.
- Support snowmobile use of the existing snowmobile trail network.
- Request upgrading as wheelchair-accessible, the portion of the Presidential Rail Trail from Route 115A to Airport Road, in order to meet the aging demographic. This is the Friends of Pondicherry's highest priority and they estimate the cost of improvement at less than \$100,000 with funding from the Federal Lands Access Program.
- Support our MOU with the New Hampshire Trails Bureau to maintain the Rail Trail between Airport Road and Route 115A.
- Support improvement of the former winter logging road, known locally as the Mooseway, connecting the Mud Pond trailhead and Little Cherry Pond Trail; prefer designation as a non-motorized winter-only access trail (i.e., snowshoe/cross-country ski) because the area is too wet and would require a considerable investment to improve the trail for summer use. In addition, the rail trail provides adequate walking and bicycling access during the summer, whereas the rail trail is heavily used by snowmobiles during winter.
- Recommended establishment of a five-car trailhead at the Colonel Whipple Trail.
- The Friends of Pondicherry agreed that we should abandon the 2.4 miles of discontinued snowmobile trail under the power line due to the presence of wetlands and because the Presidential Range Recreation Trail provides a better alternative. They further advocate that the power line, as part of the Coos Connector, be buried under the rail trail in the future.

- The Friends also noted that they do not support a potential canoe portage on the Deadwater section of the Johns River based on its distance, the presence of wetlands, and a lack of existing need.
- In order to prevent unauthorized vehicles from entering the adjacent fields, the Friends of Pondicherry suggested installation of a gate at the beginning of Slide Brook Trail where it follows an old road connecting with Route 115.
- The correct name of "Shoreline Trail" is "Shore Path".

Response: We appreciate the detailed feedback we received regarding recreational opportunities on the division. More detailed planning, including any proposed infrastructure and public access improvements, will be outlined in a forthcoming VSP. That planning effort will be in consultation with the State, partners, and other stakeholders and will be vetted in a public process consistent with NEPA.

We would note here we are supportive of a number of suggestions, including discontinuing the snowmobile trail under the powerline and removing the proposed deadwater portage on the Johns River. However, these suggestions will be considered along with others as part of our visitor services stepdown plan discussed above.

Comment: Local organizations support hunting and fishing at Pondicherry, but offer the following comments:

- Oppose the hunting of coyotes with dogs because this "attitude does not conform to fair chase standards and gives hunting a bad name."
- Oppose allowing the hunting of bobcat and crow due to the potential misidentification of Canada lynx and raven and that there is "no logical reason to allow the killing [of] a crow for sport."
- Oppose all forms of nighttime hunting because it is incompatible with other nighttime uses and facilitates poaching.
- The Friends of Pondicherry inform us that adequate opportunities already exist for "bank fishing" along Shoreline Trail without the need to cut sensitive shoreline vegetation to provide access for anglers.

Response: We are allowing hunting and other traditional wildlife-dependent uses on the refuge consistent with State regulations. There are no current plans to deviate from this approach.

Visitor access issues will be discussed in a forthcoming VSP. We do not have plans to cut vegetation along shorelines to aid in access.

Comment: We heard about signage from the Friends of Pondicherry and the Jefferson Conservation Commission. Comments ranged from completing a sign plan that follows an established standard and corrects current inconsistencies to installing interpretive signage at key locations, such as Mud Pond.

Response: Any changes to signage on the division will be discussed and proposed in a VSP. We agree that interpretive signage at the Mud Pond trail may be appropriate. In general, we attempt to minimize signage across the divisions to preserve the remote character of the division.

Comment: Multiple commenters noted errors in our public access map A-515:

- Whipple Road should be labeled between Routes 116 and 115A.
- Shoreline Trail at Cherry Pond should be relabeled as Shore Path.
- Cedar Marsh is in the wrong location; it is just east of wetland labeled as Moorhen Marsh.
- The canoe portage trail on the John's River is depicted in the wrong location; its correct location is from Hazens Pond to the Johns River Deadwater.

- Slide Brook Trail is shown as potential new trail construction when it already exists as a pedestrian trail.

Response: Your comments are noted and changes have been made.

Comment: The White Mountain National Forest concurs with our land acquisition proposal; in particular the linking of conservation lands with the WMNF and the consideration given to elevational gradient, something rare among refuge lands. They look forward to continued collaboration as adjoined Federal land managers.

Response: Your comment is noted. We look forward to future collaboration.

Comment: The Jefferson Conservation Commission suggested the following actions regarding land parcels:

- Enact a land swap in the northeast corner at the junction of Route 116, Whipple and Turnpike Roads for an 8-acre triangular shaped wetlands inholding along the railroad line south of its crossing of Route 116. Such an action would allow us to maintain our boundary consistent with road rights-of-way, thereby simplifying boundary management into the future.
- Acquire the overlook on Route 115 near the Jefferson/Carroll town line. This would preserve an iconic view of the Jefferson valley and much of the division. They further recommend maintaining the view by periodic tree cutting and mowing of the field currently within the division boundary.

The Friends of Pondicherry recommended the following with regard to land ownership at the division:

- Acquire Airport Marsh and continue to allow its management by New Hampshire Fish and Game. NH Fish and Game currently manages this popular fishing and birding hotspot under a lease agreement.
- Our proposed acquisitions in Carroll include commercial forest land owned by Bayroot LLC and managed by Wagner Woodlands. The Friends do not support fee simple acquisition of commercial upland forest; therefore any acquisition should be of development rights via conservation easement or Forest Legacy.

Response: We did not adjust the boundaries for Pondicherry CPA or CFA in the final plan. However, as we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs. We have exchanged land in the past for property of equal monetary value and equal or greater resource value. As presently owned, the route 115 overlook area is potentially well-suited for Federal Lands Access Program (FLAP) funding to facilitate access (visual) to Federal land. The Service has attempted to purchase additional land in the immediate vicinity of the overlook and would be willing to consider habitat work as a Partners Program Project to restore the area to early successional habitat.

Airport Marsh is located in the CPA, and enrollment of the working forests mentioned by the commenter could be a good fit for the Forest Legacy program and would not necessarily require action by the Service.

Pondicherry CPA

No comments were recorded or changes made.

Sprague Brook CFA (proposed; New Hampshire)

Comment: Commenters shared an appreciation for establishment of this CFA based on protecting key habitats and establishing functional ecological connections – a role that might not otherwise be present in this area.

One individual noted that our presence as a willing buyer would be advantageous to landowners in the area.

A commenter advocated for protection of the Mirey Brook watershed for drinking water purposes – the brook supplies Winchester's aquifer.

One person noted that protections afforded to priority habitat for Atlantic salmon spawning and brook trout, vernal pools, and dwarf wedgemussel would be beneficial to the health and integrity of the Ashuelot River.

Response: Your comments are noted.

Comment: A commenter suggested that expansion of “new conventional trails” would improve the interface of the public with the resource and allow for greater understanding and appreciation of its values.

Response: We agree that additional public engagement can engender support for our mission. When and if we acquire an adequate landbase in this area to prescribe site-specific management actions, we will evaluate public access opportunities in a visitor services plan. We will evaluate public access opportunities in a Visitor Services Plan and coordinate with State partners and other stakeholders while following a NEPA-compliant process.

Sprague Brook CPA

Comment: The Nature Conservancy suggests the addition of Snow Brook, an important wetland complex hydrologically connected to and immediately west of Mirey Brook in Winchester, to Sprague Brook CPA. Both Snow Brook and Mirey Brook have high relative aquatic resilience and are therefore important conservation targets. TNC suggests extending the northern boundary north of Route 10 to include all the wetland.

Response: We added a subwatershed to the west within Sprague Brook CPA in response to public comments but made no changes to the CFA. However, as we note under section “CPAs/CFAs – General” above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Specific Comments on CFAs/CPAs in Vermont (ID#s 7, 31, 32, 66, 82, 123, 156, 167, 176, 215, 216, 217, 223, 237, 242, 250, 251, 252, 289, 298)

Nulhegan Basin CFA (existing; Vermont)

Comment: The Vermont Fish and Wildlife Department supports strategies to restore the valuable and uncommon natural communities by increasing softwood composition and structural diversity, increasing woody material, and selecting some area(s) for passive management as old forest. They also suggest that the descriptive text emphasize the larger context of conserved lands in the area.

Response: Our intent is to manage uncommon natural communities by the means indicated in the comment. We explain this in appendix A under the “Nulhegan” section we provide a general course of action. As we develop the Habitat Management Plan in the future, we will engage the State in developing more site specific direction.

Comment: An experienced houndsman and State wildlife biologist suggests that we identify and manage threats to lynx, evaluate carnivore relationships within the division and the influence of other recreational activities on wildlife, and pursue habitat initiatives that benefit both lynx and bobcat.

Response: These are all valuable insights, however, we are forced to prioritize our actions based on the availability of time and resources. We will continue to collaborate with the larger scientific community (university researchers, State fish and wildlife biologists, and the Service's lynx experts) to address issues related to Canada lynx. One of the utmost questions is the role that the Nulhegan Basin can and should play in this species' recovery. On a related note, we have increased our lynx surveillance efforts during the past few years and began to assess snowshoe hare populations in 2016.

Comment: Several long-time users of the Nulhegan Basin share the identical sentiment that we “leave these lands as they are.” They follow a “live and let live” philosophy where people “make their own fun”. In essence, the lands provide a sense of serenity that they wish to maintain and share with others, and are therefore opposed to “gentrification” and overly intrusive management. Another common statement was that “camp

owners have maintained a traditional use of the land for generations and would expect those traditions to be maintained in perpetuity.”

Response: We are well acquainted with this viewpoint, which dates back to our initial acquisition of a portion of the former Champion International lands. Our history of management, as well as our future vision, is outlined in the draft CCP/EIS appendix A. This includes forest management and a range of recreational activities, including hunting, fishing, trapping, snowmobiling, and the cabin lease program, among others. In some cases additional infrastructure will be added, such as native surface trails and a car-top boat launch should we acquire the McConnell Pond tract. We believe these actions meet the needs of the larger public while also furthering our legislated purposes.

Comment: Several commenters express an appreciation for managed forests as these contribute to diverse and healthy forests and wildlife. The CLLTIA advocate maximizing the amount of lands under forest management, both for wildlife and local economic benefits.

Response: We direct commenters to a larger discussion of habitat management practices in section 25 above. More detailed habitat management information will be presented in a habitat management plan for the Nulhegan Basin Division as the first stepdown plan following approval of this CCP.

Comment: The CLLTIA advocate the reclamation of Lewis Pond as trout water and desire an “aggressive” fish stocking effort throughout Nulhegan Basin area streams, noting that stock removes pressure from native fish populations.

Response: Thank you for the feedback; any successful attempt to remove non-native smallmouth bass in favor of a native trout population will require the support of the public and especially anglers at Lewis Pond. As stated in appendix A, Nulhegan Basin Division, 1.3a, any such effort will be contemplated in cooperation with Vermont Fish and Wildlife Department. With regard to fish stocking in streams, this is an activity conducted solely at the discretion of the Vermont Fish and Wildlife Department. While we support and encourage fishing, we do advocate for the use of native fish species.

Comment: The Vermont Fish and Wildlife Department notes that they have ceased stocking brook trout in Lewis Pond and will not continue until the introduced smallmouth bass population is eradicated due to their predation of stocked trout. They also plan to terminate stocking on the Nulhegan River and Black Branch in 2016 based on the low angler effort observed during their recent survey of Northeast Kingdom rivers.

Response: The comment is noted.

Comment: The Vermont Fish and Wildlife Department reminded us that fathead minnows are also not native to Lewis Pond and would be targeted for elimination along with smallmouth bass.

Response: Sub-objective 1.3a has been updated to include fathead minnow.

Comment: The Northern Forest Canoe Trail advocates incorporation of their Northern Forest Explorers program into our list of partner-sponsored curriculum-based programs. These paddle trips focus on providing youth with environmental education as well as opportunities for empowerment, confidence building, leadership development and teambuilding. A trip could be planned that travels the Nulhegan River and a portion of the Connecticut River.

Response: We would be happy to serve as a host site for your outings. This could include making available our facilities and having staff meet with the participants. Our only request is that this be a Northern Forest Canoe Trail directed program given that we do not have the staff to properly administer such a program. We recommend you discuss this with the Nulhegan Basin manager directly.

Comment: A cabin leaseholder appreciated the proposed continuation of hunting, fishing, and snowmobiling, even though he does not participate in those activities.

Response: Thank you; the comment is noted.

Comment: An experienced houndsman and State wildlife biologist provided a lengthy and detailed comment letter regarding bobcat hunting and Canada lynx at the Nulhegan Basin Division. In a subsequent email exchange to clarify the key points, we derived the following comments. He shared an opinion that “threats and management challenges for lynx in the Nulhegan Basin are far more complex than any posed by recreational hunting bobcat with hounds.” Further, he noted that there is no compelling evidence to suggest bobcat hunting poses a threat to Canada lynx at the division, and therefore supports our approach to this activity. He advocated for a continuation of bobcat hunting per Vermont regulations without additional refuge-specific regulations – any such regulations should be based on a review of bobcat population and hunting data, and we should be mindful that refuge-regulations will likely impact hunters on adjoining lands given the wide-ranging nature of hunting with hounds. Lastly, he noted an opportunity to utilize bobcat and hare hunters as additional “eyes and ears” and that this constituency could become potential advocates for Refuge initiatives.

Response: We agree with the substance of this comment. To clarify, we are not proposing changes to the bobcat hunting season; we have only proposed developing a contact list of participants so that we may reach out to them should a significant finding occur with respect to Canada lynx, such as locating a den site that should be avoided by hounds. We also agree that long-time refuge users observe many things that could be of interest and that hunters of all types can become valued advocates - we welcome their engagement.

Comment: A commenter objects to our allowance of hunting at Nulhegan Basin Division. They believe this area should not be open to hunting because it is a recognized habitat for federally listed species such as Canada lynx.

Response: Hunting has occurred in a sustainable form at the Nulhegan Basin Division for decades – both prior to our acquisition and in the years since. We believe our existing and proposed measures will adequately protect any Canada lynx that may occur on the division, which in spite of increased surveillance, have not been detected during the past two years.

Comment: The Vermont Fish and Wildlife Department recommends we maintain angler access at the spur road from the powerline near the former Buzzell Dam. They note this is one of the better places to access the trout habitat restoration project below the Black Branch gorge. They further suggest constructing a trail from the powerline to the waterfall in the Black Branch Gorge – “the fishing is good, and the waterfall is impressive”.

They also recommend we promote fishing opportunities at the trout habitat restoration sites on the North and Black Branches. With a suspected increase in abundance and size of brook trout, anglers will have an opportunity to view the restoration projects and learn about the importance of large woody material to stream habitat quality.

Response: Map A.56 displays this proposed fishing access site near the former Buzzell Dam. We will consider this recommendation for additional trails and means to enhance angler access when we develop a visitor services plan for Nulhegan Basin Division. That planning process will include public involvement and a NEPA compliant document.

Comment: The Vermont Fish and Wildlife Department suggests that we clearly state we’ll establish and maintain at least a car-top boat access point at McConnell Pond should we acquire the property.

Response: We have clarified Objective 3.2a (Fishing Opportunities, Access, and Infrastructure) to create a car-top access at McConnell Pond, should we acquire the parcel; further full ADA-compliance would be based on interest.

Comment: A camp leaseholder appreciates the proposal to offer additional hiking trails, especially one originating near Lewis Pond Overlook and providing access to Gore Mountain.

Response: Thank you for the comment. The proposed action would partner with the Green Mountain Club to construct a trail from the Overlook area that would link with a trail to Gore Mountain.

Comment: Several commenters, including local governments, advocate for the ability to ride bicycles on the division.

Response: The proposed action would allow for the use of bicycles on any gravel roads open to vehicular travel.

Comment: The Northern Forest Canoe Trail looks forward to the opportunity to increase connectivity between the amenities offered at the visitor contact station and paddlers on the Nulhegan River via the addition of infrastructure and signage. They also supported any efforts to improve paddler access to the Nulhegan River at the two Route 105 crossings: Wenlock Bridge and Stone Dam Road. The organization also offered the following additional points for page A-611:

- The inclusion of riverside signage identifying the take-out location that connects to the Nulhegan River Trail as the primary river access to the visitor contact station.
- The potential availability of refuge resources to improve the Stone Dam access point, in the form of funding, materials, and personnel time.
- This could be addressed with this clarifying sentence: “In addition to construction and on-going maintenance, the Northern Forest Canoe Trail would be responsible for obtaining any necessary permits. Support of the Refuge in the form of funding, materials, and personnel time can be made available for this work if deemed appropriate by the Refuge Manager.”

Response: Thank you for the comment. The inclusion of appropriate signage is a logical aspect of this project; we would only need to ensure cultural resources are not adversely affected. As to the proposed Stone Dam Road access point, while we support the project, we do not know at this time what resources we might have available. We suggest discussing this with the Nulhegan Basin Division manager should this project be included in the final CCP.

Comment: Several commenters request that the 40-mile road network be preserved in its entirety given its importance to the public's ability to access and enjoy the division. A comment from an organization representing camp leaseholders in the Nulhegan region appreciates that full vehicular access will be maintained on refuge lands.

Response: While we are not proposing to close any roads currently open to vehicular travel, the availability of funding has and will continue to dictate our maintenance capabilities. We noted in appendix A for Nulhegan Basin Division, under objective 3.3, that we will prioritize maintenance of Stone Dam, Canal, Eagle's Nest, Upper Lewis Pond, Lewis Pond Overlook, and Four Mile Roads in order to provide access to the widest range of users, while providing for our habitat management needs.

Comment: We received several comments regarding snowmobiling. These came from organizations such as the Vermont Association of Snow Travelers (VAST) and CLLTIA, as well as, interested individuals. A majority expressed the simple statement that the existing snowmobile trail network be maintained – either for general use or to allow access to recreational cabins and hunting areas.

A more focused series of comments involved our proposed elimination of a somewhat comparable mileage of what we considered redundant trails to mitigate the effects of constructing a new trail to access the division's visitor contact station. Such a trail was proposed by one of the snowmobile clubs in order to offer access

to an indoor space where snowmobilers could get out of the weather; warm-up, view the exhibits, use the restrooms, etc. We agreed with this prospect and also viewed it as an opportunity for one or more local clubs to potentially have a "presence" whereby members could interact directly with visiting snowmobilers. We heard support for the proposed trail, although opposition to the closure of existing trails. While opposing any closure, VAST noted specifically the importance of trail 114 between EX27 and EX271 to maintaining the integrity of the trail network during low-snow periods and thereby extend the season length by providing access to higher elevation areas.

The Center for Biological Diversity supported our proposal to allow pedestrian use of snowmobile trails; however they continue to oppose recreational snowmobiling.

Response: The importance of trail 114 between EX27 and EX271 to maintaining the integrity of the trail network during low-snow periods was a significant thing that we learned during the public comment process. Based on this input, appendix A, Nulhegan Basin, 3.4b. has been revised to retain this trail. We continue to advocate the removal of the approximately 1.1 miles of secondary trail C102/114 between EX22 and EX32 (one-half of a small loop) on the McConnell Pond tract (if a new trail to the visitor contact station is created, and if the McConnell Pond tract is acquired by the Service). This is a non-essential, redundant trail that best represents the type of conditions found in the area proposed for a new trail that would access the refuge visitor contact station. We would note that this would result in an approximately 0.3 mile increase in the overall trail network.

Comment: Several commenters provided input regarding our land acquisition proposal for this CFA, the most notable aspect being the acquisition of the McConnell Pond tract. The CLLTIA voted narrowly to endorse the Service's acquisition of the McConnell Pond tract provided that the currently gated road network is opened to the public and the snowmobile network remain intact. The Board of Governors of the Unified Towns and Gores were opposed to this acquisition based on adverse tax impacts.

Response: We appreciate the endorsement and it is our intention to open the road network as depicted in the draft plan's maps. We also intend to maintain the snowmobile network, except for closing 0.9 miles of a redundant loop if a new 1.4-mile trail to the visitor contact station is constructed.

Comment: The Friends of the Connecticut River Paddlers' Trail advocated identifying the entire Nulhegan River watershed as a CFA, specifically extending the boundary an additional 3 or 4 miles downstream along the Nulhegan River. They noted several landowners with whom they've been working that share an interest in conserving the river and the Friends would like to partner with us to protect the remainder of the Nulhegan River corridor.

Response: We did not adjust the boundaries for the Nulhegan CFA or CPA. However, as we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Although we are not proposing an expansion of the CFA to encompass the area proposed, the watershed is identified as the CPA. We look forward to working with you in achieving your conservation goals.

Comment: The Vermont Fish and Wildlife Department suggested an expansion in the CFA to include Nulhegan Pond and the State airport.

Response: We are not proposing an increase in this CFA to include Nulhegan Pond and the State airport. The Nulhegan Pond is located within the CPA, which may be protected under the 10% authority described in the previous comment and under "CPAs/CFAs – General." It is not in the Service's best interest to acquire an active runway. We would suggest the department enter into a management agreement with the State agency responsible for the airport if their interest is with the status of the site's grasslands.

Nulhegan Basin CPA

No comments were recorded or changes made.

Ompompanoosuc River CFA (proposed; Vermont)

Comment: The West Fairlee Conservation Commission supported our proposed designation of this CFA.

Response: Your comment is noted.

Comment: The Vermont Fish and Wildlife Department suggested the CFA boundary be expanded in the southwest to include the parcel north of Vershire Road.

Response: We did not adjust the Ompompanoosuc CFA or CPA boundary. The area suggested includes a Superfund site. It is not in the Service's best interest to acquire a Superfund site. However, should cleanup occur, we would re-evaluate its potential using our 10% authority as described under "CPAs/CFAs – General" above. In the meantime we will help protect habitats of interest through our partners program and New England Field Office.

Ompompanoosuc River CPA

No comments were recorded or changes made.

Ottauquechee River CPA/CFA

No comments were recorded or changes made.

West River CFA (proposed; Vermont)

Comment: The Vermont Fish and Wildlife Department was disappointed in the apparent minor role played by federally endangered plants in the design of our proposed CFAs. They noted that while we list the federally endangered northeastern bulrush as a resource of conservation concern for the proposed West River CPA, the West River CFA includes only a single known population. They further point out that several populations exist just beyond this CFA's eastern boundary and recommend extending the CFA boundary to the east to capture the populations within the Grassy Brook HUC-12 watershed.

Response: Part of our rationale for expanding the CPA was to include a subwatershed that contains federally endangered northeastern bulrush. Please refer to boundary delineation section below.

Comment: The Windham Regional Commission offered strong support for conservation of this proposed CFA, however, they were concerned by objections shared by their member towns regarding the loss of tax revenue associated with lands acquired by the Federal Government. As a result, the WRC would strongly urge the Refuge to actively engage the WRC and affected communities during the land acquisition process and/or emphasize the implementation of its habitat conservation goals through the acquisition of conservation easements either through direct purchase or facilitation of third party acquisition. In order to help offset the reduced oversight of conservation easements, the Refuge could put into place a conservation easement funding grant program that would require participating properties to include certain management prescriptions. Engaging the local community and/or securing conservation easements will help garner local support for the conserved lands and, depending on the nature of the acquisition, will help maintain the property tax base.

Response: Please refer to the section titled "Socioeconomic impacts" for detailed discussion on impacts to local tax revenue.

The advantages of having a final plan is that it serves as a communication tool to engage others in conservation. We will use the final plan to work with watershed communities to implement mutually beneficial actions. In the past, we have held annual coordination meetings within communities where refuge lands are administered. Once the CCP is completed, we plan to resume those meetings to discuss implementation. Further, the State, communities, and public will be involved in refuge stepdown planning.

West River CPA

Comment: The VFWD noted that while we reference the federally endangered northeastern bulrush as a resource of concern within this CPA, the corresponding CFA contains only a single known bulrush population.

Response: While we did not change West River CFA boundaries, we adjusted the CPA boundaries to include the Grassy Brook subwatershed which lies to the east and includes the endangered northeastern bulrush. As we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

White River CPA/CFA (proposed; Vermont)

No comments were recorded or changes made.

Putney Mountain Unit (existing; Vermont)

Comment: The Vermont Fish and Wildlife Department questioned the absence of any proposed additions to the Putney Mountain Unit. While the protection of northeastern bulrush is the justification for the unit's establishment, they noted that presently no northeastern bulrush plants occur within our ownership. The wetland that contains the extant population of bulrush is only partly on refuge property, and presently the bulrush occurs only in the privately owned, northern half of this wetland. While this is presently the case, the bulrush is known to move around within and among hydrologically connected wetlands so it is likely to reappear in the Service-owned portion of the wetland as water levels fluctuate. However, this makes it imperative to own the entire wetland containing the bulrush as well as a sizeable upland buffer in order to protect the hydrology of the wetland and allow for the natural water level fluctuations that enable the bulrush to persist. Owning a larger area around the wetlands on the property will also allow beaver activity to continue which they have identified an integral to the long term persistence of the bulrush.

Response: We did not adjust the boundary for Putney Mountain Unit but added Grassy Brook subwatershed in the West River CPA in response to public comments about northeastern bulrush. Now, the Putney Unit lies entirely within the West River CPA. As we note under section "CPAs/CFAs – General" above, we are seeking authority to acquire 10% of our target acreage in CPAs.

Comment: The Putney Mountain Association endorses our proposal to link the refuge trails with their larger public trail network. This would allow increased environmental education and interpretive opportunities, as well as, light recreation and nature observation.

Response: The comment is noted.

Table O.2 Cross-reference of Comment Submitter Names, their Unique Identifying Number, and any Organization or Affiliation They Self-Identified

Commenter ID	Submitter Name	Organization	Organization Type
1	Marc Abear		Individual
2	John Aberth		Individual
3	Robert W. Ackerman	New England Forestry Foundation	Organization
4	Robert Allen		Individual
5	Karen Amirault		Individual
6	Eric Anches		Individual
7	Steve Anderson		Individual
8	Brenna Angelillo		Individual
9	Anonymous		Individual
10	Anonymous		Individual
11	Anonymous		Individual
12	Anonymous		Individual
13	Anonymous		Individual
14	Anonymous		Individual
15	Anonymous		Individual
16	Anonymous		Individual
17	Anonymous		Individual
18	Anonymous		Individual
19	Anonymous		Individual
20	Anonymous		Individual
21	Anonymous		Individual
22	Anonymous		Individual
23	Anonymous		Individual
24	Anonymous		Individual
25	Anonymous		Individual
26	Anonymous		Individual
27	Anonymous		Individual
28	Anonymous		Individual
29	Anonymous		Individual
30	Anonymous	Granby (CT) Board of Selectmen	Government
31	Anonymous	Vermont Association of Snow Travelers, Inc. (VAST)	Organization
32	Anonymous	Vermont Forest Products Association	Organization
33	Anonymous		Individual

Commenter ID	Submitter Name	Organization	Organization Type
34	Don Anonymous		Individual
35	Judy Aron		Individual
36	Janice Atkins		Individual
37	Michael Bald		Individual
38	Tara Bamford	Connecticut River Joint Commissions Headwaters Subcommittee	Organization
39	Tara Bamford	Connecticut River Joint Commissions Mt. Ascutney Subcommittee	Organization
40	Tara Bamford	Connecticut River Joint Commissions Riverbend Subcommittee	Organization
41	Tara Bamford	Connecticut River Joint Commissions Upper Valley Subcommittee	Organization
42	Bob Bancroft		Individual
43	Ira Bancroft		Individual
44	Robert Bancroft		Individual
45	Larry Bandolin		Individual
46	Mike Bard		Individual
47	Bruce Baroffio		Organization
48	Randall Barrows	Vermont Trappers Association	Organization
49	Marc Beaudette		Individual
50	Ana Berninger		Individual
51	Tom Berriman		Individual
52	Dr. Gretchen Rous Besser		Individual
53	Stewart Bevin		Individual
54	Art Bingham		Individual
55	Jacqueline Bishop		Individual
56	Joanne Blanchard		Individual
57	Cheryl Bodge		Individual
58	Chris Bradley	Vermont Federation of Sportsmen's Clubs	Organization
59	Charles Brainerd	Ennead Architects AIA	Business
60	Jesse E. Brownback		Individual
61	Ann Brubaker		Individual
62	Rocky Bunnell		Individual
63	Jim Calchera		Individual
64	Terry Callum		Individual
65	Kristen Cameron		Individual
66	Chris Campany	Windham Regional Commission	Government

Service's Response to Comments by Subject

Commenter ID	Submitter Name	Organization	Organization Type
67	Don Campbell	Town of Columbia, Board of Selectmen	Government
68	Elisa Campbell	Sierra Club, Massachusetts Chapter	Organization
69	Rodney Campbell		Individual
70	Stacey Campbell		Individual
71	Stacey Campbell	Columbia Planning Board	Government
72	Hunter Carbee	Granite State Division of the Society of American Foresters	Organization
73	Anne Cartwright	Graystone Landing Tree Farm	Business
74	Karen Cartwright		Individual
75	Dorothy Carvalho		Individual
76	Reed Cass		Individual
77	John Caveney		Individual
78	Bill Chabot	Canaan Conservation Commission	Organization
79	Bill Chabot	Mascoma River Local Advisory Committee (MRLAC)	Government
80	Ryan Chambers		Individual
81	James Chapman		Individual
82	Ernest and Louise Choquette		Individual
83	John J. Clarke	Mass Audubon	Organization
84	Dorothy Coe de Hernandez		Individual
85	John Cole		Individual
86	Ken Cole		Individual
87	Tom Colgan	Wagner Forest Management, Ltd.	Business
88	Nancy C. Collier	Hanover Conservancy	Organization
89	Michael Collins		Individual
90	Patrick Comins	Audubon Connecticut	Organization
91	Joel Cope	Town of Brighton Selectboard	Government
92	D. Cormier		Individual
93	Marc Covey		Individual
94	Michael Covey		Individual
95	Joseph Crawford		Individual
96	Colby Crehan		Individual
97	Don Crockett		Individual
98	Eddie Cutler		Individual
99	Lawrence Cyrulik	Mattabeseck Audubon Society	Organization

Commenter ID	Submitter Name	Organization	Organization Type
100	Walter Czajkowski		Individual
101	Kristin DeBoer	Kestrel Land Trust	Organization
102	David Deen	Connecticut River Watershed Council	Organization
103	Ross D'Elia	HPP Inc.	Business
104	Bob DePino		Individual
105	Valerie Desmarais		Individual
106	Christine Destremps		Individual
107	John L. Devney	Delta Waterfowl	Organization
108	MaryEllen Dickie		Individual
109	Howard Dindo		Individual
110	Joy Dion		Individual
111	Jana Dunt		Individual
112	Stephen Dybas		Individual
113	Rick Evans		Individual
114	George H. Evarts	G. H. Evarts & Co., Inc.	Business
115	Monica Farrington		Individual
116	Wayne Feiden		Individual
117	Eileen Fielding	The Farmington River Watershed Association	Organization
118	Patrick Finnie		Individual
119	Andrew Fisk	Connecticut River Watershed Council	Organization
120	Corrie Folsom-O'Keefe	Audubon Connecticut	Organization
121	Howard Brainerd Foltz		Individual
122	Carol R. Foss	Audubon Society of New Hampshire	Organization
123	Dennis Fournier		Individual
124	Brenna Galdenzi	Protect Our Wildlife	Organization
125	Brenna Galdenzi	Protect Our Wildlife Vermont; The Humane Society of the United States	Organization
126	Dan Galdenzi		Individual
127	Chris Gamache	New Hampshire Department of Resources and Economic Development, Parks and Recreation, Bureau of Trails	Government
128	Ken Gammell		Individual
129	James Gardner		Individual
130	Emily Geser		Individual
131	Donna Goldberg		Individual
132	Larry Gomes		Individual
133	Kevin Gough	Town of Bloomfield, Connecticut	Government

Service's Response to Comments by Subject

Commenter ID	Submitter Name	Organization	Organization Type
134	Craig Goulet		Individual
135	David Govatski	Friends of Pondicherry	Organization
136	Jerry Graham		Individual
137	Bob Green	Green Woodlands	Business
138	Michael Green		Individual
139	Peter G. Gregory	Two Rivers-Ottawaquechee Regional Commission (TRORC)	Government
140	Annie Guion	Vermont Humane Federation	Organization
141	Thomas Hahn		Individual
142	Sylvia Halkin		Individual
143	Steve Hardy	Green Mountain Forestry LLC	Business
144	Mitchell Harrison		Individual
145	Kimberly Hart		Individual
146	Christine Haugen		Individual
147	Kurt Heidinger	Biocitizens School of Environmental Philosophy	Organization
148	Geordie Heller		Individual
149	Sharl Heller	Massachusetts Forest and Park Friends Network	Organization
150	Erin Helmken		Individual
151	Janice Higgins		Individual
152	Larry Higgins	Safari Club International	Organization
153	Russell Hirschler	Upper Valley Trails Alliance	Organization
154	Melissa Hoffman		Individual
155	Robbo Holleran		Individual
156	Marty Howe		Individual
157	Pete Howland		Individual
158	Andrew Hrycyna		Individual
159	Linda Huebner		Individual
160	Phil Huffman	The Nature Conservancy	Organization
161	Jim Humphreys		Individual
162	Anthony Irving	The Eightmile River Wild & Scenic Coordinating Committee	Organization
163	Lisa Jablow		Individual
164	Leroy Jackson		Individual
165	Jill Jacobelli		Individual
166	Debi Jansen-Tanner		Individual

Commenter ID	Submitter Name	Organization	Organization Type
167	Rick Jean	Champion Lands Leaseholders and Traditional Interests Association	Organization
168	Casey Jennings		Individual
169	Jenny Joczik		Individual
170	Virginia Joczik	Green Mountain Animal Defenders	Organization
171	Kathy Johnson		Individual
172	Robert Johnson	New Hampshire Farm Bureau Federation	Organization
173	R. Kane		Individual
174	Jonah Keane	Massachusetts Audubon Society	Organization
175	Ann Kearns	Kestrel Land Trust Advisory Council	Organization
176	Cleo Kearns	West Fairlee Center Conservation Commission	Government
177	Coleen Kearon		Individual
178	Gordon Kemp		Individual
179	Jane Kennedy		Individual
180	Ann Kilpatrick	Connecticut Department of Energy and Environmental Protection	Government
181	John King	King Forest Industries, Inc.	Business
182	Bruce H. Kirmmse	Town of Randolph Conservation Commission	Government
183	Wayne Klockner	The Nature Conservancy	Organization
184	Eric Knapp	The Connecticut Yankee Conservation Project	Organization
185	Alex Knight		Individual
186	Harry Koolen		Individual
187	Rebecca L		Individual
188	Susan Labrie, on behalf of Robert Racos	Chesterfield, Massachusetts Select Board	Government
189	Liz Lacy	National Park Service	Government
190	John Lapre		Individual
191	Lee Larson		Individual
192	Peggy W Larson		Individual
193	Cristin Laux		Individual
194	Kay Lawrence		Individual
195	Kevin Lawrence		Individual
196	Matt Leahy	Society for the Protection of New Hampshire Forests	Organization
197	Paul Lefebvre	Vermont Representative	Government

Service's Response to Comments by Subject

Commenter ID	Submitter Name	Organization	Organization Type
198	Michael Leff	Ecological Connections	Business
199	Mike Leonard		Individual
200	David Lersch	Connecticut Chapter of Delta Waterfowl Foundation	Organization
201	Athena Letourneau		Individual
202	Beth A. Levine		Individual
203	Emily Lewis		Individual
204	Richard Lieberman		Individual
205	Steve Lindsey		Individual
206	Thomas Linell		Individual
207	Brad Lockwood		Individual
208	Jennifer Lovett		Individual
209	Ellen Lukens		Individual
210	Kim Lutz	Friends of Silvio O. Conte Refuge	Organization
211	Michelle MacKenzie		Individual
212	Bill Maloney		Individual
213	Jennifer Mardin	Jefferson Conservation Commission	Government
214	Janine Marr		Individual
215	Mollie Matteson	Center for Biological Diversity	Organization
216	Emily McAdoo		Individual
217	Emily McAdoo	Putney Mountain Association	Organization
218	Ashley McAvey		Individual
219	Sean McCarthy		Individual
220	Jan McClure	The Nature Conservancy, New Hampshire Chapter	Organization
221	James McHutchison	The Haddam Neck Spirit	Organization
222	Dennis McKenney		Individual
223	Steve McLeod	Vermont Traditions Coalition	Organization
224	Walter Medwid		Individual
225	William Meyers		Individual
226	Malcolm Milne	Durgin and Crowell Lumber Co.	Business
227	Lois Mintah		Individual
228	Patricia Monteferrante		Individual
229	Emily Moore		Individual
230	Marvin Moriarty		Individual
231	Mike Morrison		Individual

Commenter ID	Submitter Name	Organization	Organization Type
232	Meredith B. Musick		Individual
233	Mark Nelson	Vermont Chapter of the Sierra Club	Organization
234	Michael Nelson	Town of Montague	Government
235	Karen Nielsen		Individual
236	Barbara Nolan		Individual
237	Barbara Nolan	Board of Governors of Unified Towns and Gores	Government
238	Roger Noonan	New Hampshire Association of Conservation Districts	Organization
239	Timothy Noonan		Individual
240	Mike O'Hara		Individual
241	Cheryl Sams O'Neill	National Park Service	Government
242	Walter Opuszynski	Northern Forest Canoe Trail	Organization
243	Amy B. Paterson	Connecticut Land Conservation Council	Organization
244	Steve Patten	New Hampshire Timberland Owners Association	Organization
245	Sara Pellegrino	The Nature Conservancy	Organization
246	Mary Pelletier	Park Watershed	Organization
247	Daniel Percy		Individual
248	Anita Phillips		Individual
249	William Pickens		Individual
250	Noah Pollock	Friends of Connecticut River Paddlers' Trail	Organization
251	Noah Pollock	Vermont River Conservancy; Friends of Connecticut River Paddlers' Trail	Organization
252	Louis Porter	Vermont Department of Fish and Wildlife	Government
253	Toby Powers		Individual
254	Walt Procopio		Individual
255	Brock Quesnel		Individual
256	Sheryl Rapee-Adams		Individual
257	Ron Rhodes	Connecticut River Watershed Council	Organization
258	Pete Richardson		Individual
259	Sally S. Rieger	Lower Farmington River and Salmon Brook Wild and Scenic Study Committee	Organization
260	Christopher Rietmann		Individual
261	Christopher Rietmann	Town of Alstead, New Hampshire Board of Selectmen	Government
262	Barrett S. Robbins-Pianka		Individual

Service's Response to Comments by Subject

Commenter ID	Submitter Name	Organization	Organization Type
263	Joe Robertie	Precision Lumber, Inc.	Business
264	David Roby	Trustee of Bliss Lane Realty Trust and Bear Hill Conservancy Trust	Organization
265	Patricia Rodrigues		Individual
266	Nanette Rogers		Individual
267	Susan J. Roman	The Windmill Hill Pinnacle Association	Organization
268	E Roy		Individual
269	Gus Ruth	Winchester Conservation Commission	Organization
270	Neal Saini		Individual
271	Michael Samson	Town of Canaan	Government
272	Elizabeth Schmitt	Great Meadows Conservation Trust, Inc.	Organization
273	Colleen Schuster		Individual
274	Duncan Schweitzer		Individual
275	Margaret Sheehan		Individual
276	Pat Shields		Individual
277	Norman Sims		Individual
278	Matthew Sisk	Massachusetts Department of Conservation and Recreation	Government
279	Barbara Skuly	Ashuelot River Local Advisory Committee (ARLAC)	Government
280	Bruce Smith		Individual
281	Markelle Smith	The Nature Conservancy	Organization
282	Vicki Smith		Individual
283	Liana Sobko		Individual
284	Olga Sobko		Individual
285	Annie Somers		Individual
286	Annette Spaulding		Individual
287	Butch Spear		Individual
288	Paul Spitzer		Individual
289	William W. Staats		Individual
290	John Stadler		Individual
291	Claudia Stauber		Individual
292	Kelly Stettner		Individual
293	Jasen Stock	New Hampshire Timberland Owners Association	Organization
294	Eric Stohl	Town of Columbia, Board of Selectmen	Government
295	Michael Sussman		Individual
296	Stanley Swaim		Individual

Commenter ID	Submitter Name	Organization	Organization Type
297	Kristen Sykes	Appalachian Mountain Club	Organization
298	Matt Tetreault	Vermont Association of Snow Travelers, Inc. (VAST)	Organization
299	John Therriault		Individual
300	Ed Thomas	Town of Marlow, Board of Selectmen	Government
301	Timothy Timmerman	Environmental Protection Agency	Government
302	Holly Tippett		Individual
303	J.H. Torrance Downes	Connecticut River Gateway Commission	Government
304	Pamela Towne		Individual
305	Ken Urbanski		Individual
306	Thomas Wagner	U.S. Forest Service	Government
307	Diana Waldron		Individual
308	Maria Weick		Individual
309	Howard Weiss-Tisman		Individual
310	Pete Westover		Individual
311	Margaret Willey		Individual
312	Joel Williams		Individual
313	Margaret Wilson	Connecticut River Gateway Commission	Government
314	Paul Wilson		Individual
315	Stuart Winquist	Middlesex Land Trust, Inc.	Organization
316	Margery Winters	Town of Simsbury Conservation Commission	Government
317	Patricia Young	Salmon River Watershed Partnership	Organization
318	John Zelig		Individual

