



Analysis of Public Comment

USDA Forest
Service
Recreation
Solutions

March 18, 2008

P.O. Box 7669
Missoula, MT
59807

U.S. Department of the Interior, Fish & Wildlife Service

Lake Umbagog National Wildlife Refuge

Draft Comprehensive Conservation Plan and Environmental Impact Statement



The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

Table of Contents

Introduction..... 1

Summary of Comments..... 3

 Synopsis..... 3

 Planning 4

 Planning Process and Policy [1.0]..... 4

 Purpose and Need [2.0] 12

 Alternatives – Chapter 2..... 14

 Alternatives [3.0] 14

Affected Environment and Environmental Consequences..... 22

 Refuge Physical, Biological, and Socio-Economic Resources [4.0] 22

 Refuge Administration [5.0]..... 24

 Social and Economic Values [6.0]..... 32

 Air Quality [7.0]..... 35

 Open Water and Wetland Habitats and Species [10.0] 35

 Floodplain, Lakeshore, and Riparian Habitats and Species [11.0]..... 46

 Upland Forest Matrix Habitats and Species [12.0] 47

 Priority Public Uses [14.0] 48

 Other Public Uses [15.0] 56

 Appendices [16.0] 64

Appendix A..... 1

Appendix B 1

Appendix C..... 1

Appendix D..... 1

Appendix E 1

Appendix F 1

Introduction

The authors of this report, the USDA Forest Service Recreation Solutions Enterprise Team, represent individuals with expertise in summarizing public comments on major federal land management agency proposals, in particular, those of the Forest Service, Bureau of Land Management, National Park Service, and U.S Fish and Wildlife Service. This report summarizes public comments submitted on the Draft Comprehensive Conservation Plan and Environmental Impact Statement (hereafter Draft CCP/EIS) prepared to describe the alternatives for the Lake Umbagog National Wildlife Refuge (NWR). Recreation Solutions Enterprise Team staff members maintain expertise in the content analysis process and an unbiased approach to analyzing public comment.

This report provides a narrative review of concerns raised as well as appendices detailing the coding process for reviewing public comments, analyzing demographic information derived from responses, and listing individuals responsible for the analysis. The narrative summary provides an overview of pervasive themes in public sentiment rather than a comprehensive description of each public concern.

Public input on the Draft CCP/EIS is documented, analyzed, and summarized using a process called content analysis. This is a systematic and objective method of compiling and categorizing the full range of public viewpoints and concerns regarding a plan or project. The goal of the analysis process is to capture every unique idea or issue that was raised about the proposals. This process makes no attempt to treat comments as votes. In no way does content analysis attempt to sway decision makers toward the will of any majority. Content analysis ensures that every comment is considered at some point in the decision process. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into the final planning document. The process facilitates agency response to comment. It is the responsibility of the U.S Fish and Wildlife Service to provide a response to the comments outlined in this report for the Lake Umbagog NWR Draft CCP/EIS.

All responses received during the official public comment period (i.e., letters, emails, faxes, oral testimony, and hand delivered input) are included in this analysis. In the content analysis process, each response is given a unique identifying number, which allows analysts to link specific comments to original letters. Respondents' names and addresses are then entered into a database, enabling creation of a complete mailing list of all respondents. The database is also used to track pertinent demographic information such as responses from special interest groups or federal, state, tribal, county, and local governments.

All input is considered and reviewed by an Enterprise Team analyst. Comments are then entered into the database. In preparing the final summary analysis, public statements are reviewed again using database printouts. These reports track all coded input and allow analysts to identify a wide range of public concerns and analyze the relationships between them in a narrative summary.

The U.S. Fish and Wildlife Service solicited comments on the Draft CCP/EIS from July 6, 2007 through September 21, 2007.

During the comment period, 14,269 responses, oral and written, were received representing 14,413 signatures. Organized response campaigns (forms) represented 97 percent (13,848 of 14,269) of the total responses.

Summary of Comments

Synopsis

As might be expected from the volume of comments received, a wide diversity of opinions is represented in response to many of the Service's management proposals. Those opinions range from broad philosophical statements to specific comments on current and proposed actions or activities. The topics that generated the greatest response include land acquisition, furbearer management, hunting, access, snowmobiling, and public uses determined not compatible with the Refuge System Improvement Act, such as berry picking.

The sources of comments are also diverse. We heard from 14,350 individuals, 10 government agencies and elected officials, 9 business and industry affiliates, and 44 other organizations, including conservation, user and special interest groups. Letters and emails were received from 50 of the United States, the District of Columbia, Virgin Islands, and eight foreign countries.

Planning

Planning Process and Policy [1.0]

Respondents complimented the U.S. Fish and Wildlife Service (FWS) on their planning efforts for the Lake Umbagog National Wildlife Refuge (NWR or LUNWR) Draft CCP/EIS. One respondent wrote, “We commend the U.S. Fish and Wildlife Service and the Lake Umbagog Wildlife Refuge for the broad and introspective Draft Comprehensive Conservation Plan.” Another stated, “We believe that the Fish and Wildlife Service has done a thorough job of scoping and researching its Draft Comprehensive Conservation Plan.” In contrast, a few respondents see the document as inadequate and request that a revised draft be published.

Timeframes/Length of Comment Period [1.1]

Commenters appreciated the opportunity to submit public comments. Some added that they hoped the FWS would consider their input. Several thanked the FWS for extending the comment deadline. One person stated, “Thank you and your planning team for extending the deadline for comment . . . I attended your public information session in mid-July. It was an excellent introduction to your document. It was helpful to me to have the extra time to digest all the materials presented before having to submit comments.” Another commented, “Thank you for allowing public comment on your draft comprehensive conservation plan and for extending the comment period to September 21, 2007.”

One respondent criticized the FWS for not following the tentative schedule published on the FWS website and further states, “The public comment period was extended from August 24, 2007 to September 21, 2007. In part, this resulted from the fact that the maps reproduced on the website were unreadable, a fact noticed not by the planners but by members of the public. . . . The schedule calls for releasing the final CCP in the winter of 2007. Either that means sometime between December 21, 2007, and December 31, 2007, or sometime between December 21, 2007 and March 20, 2008 (approximately).”

Public meetings were appreciated by commenters, “First of all I would like to say thank you for the opportunity of attending the recent Errol meeting. It was well done. The question format seemed to be very informative along with the presentation.” Another stated, “I commend the US Fish and Wildlife Service for their democratic and informative open house and public meetings held throughout NH and ME this past summer. The last session held on 8-16-07 in Errol was the most informative and so very well presented by Manager Paul Casey.” Some further stated, “Thank you in advance for all the time you all spent with me during the meetings and hearings, and in discussions before and after those events. I firmly believe that if the FWS had taken the time and effort that you all expended this summer to present a draft outline and then call hearings, the result would have been much more acceptable to a majority of stakeholders and would have gained more support going forward.”

One respondent commented on the timing and materials presented at a public meeting, "Regarding Poster Display: "Alternative B - Proposed Public Use" It fails to list Hunting and especially trapping as "public uses" and it should. . . . Regarding: Timing of 30 minute presentations. The public was not adequately informed that this presentation would begin and end during the scheduled open house portion, .to the start of the hearing."

Some respondents argue that only local residents should be able to submit public comment. Commenters stated, "I feel it is very unfair of your organization to ask people who live out of the Sturtevant Pond area to have a say in this matter." and, "I realize that you get many letters from "concerned citizens" that may visit a refuge for a few days once or twice a year. Some of those are form letters in a campaign to affect land that is hundreds of miles from the correspondent and that he has never visited. I would hope that those letters received from local people that have to live with the consequences of your decisions should carry more weight." One respondent added, "...they don't even live here, they don't even know the area and they are the ones that are making decisions on our place that we live and we pay taxes and our playground. And, I think that is totally wrong." The location of public meetings was also discussed. "It is very easy for people in Concord and in Augusta, where you are having all these other meetings, to say yeah, go ahead, buy another 70 thousand acres or whatever, but I hope that if it's possible that you can weigh your decisions on what the neighborhood has to say because that's what we are."

Some respondents were critical of the public involvement efforts. "I wish that it would have been more publicized in the beginning, where people would have had an idea of what Plan A was all about, Plan B was all about, and Plan C was all about and really people don't have much of an idea. I know you had meetings before, but not many people knew about them, or attended them, and that was a problem." Another respondent stated, "I would like to say that I wasn't aware of the informational meeting. It wasn't publicized in the flyer that I got and I probably would have come and met some of you all sooner." One out-of-state local property owner was disappointed that they were not included in the mailing list for the stakeholder survey.

A few respondents were frustrated with accessing the document and maps. "I was not able to download everything off of the computer, the maps and the pictures didn't come out very well, but I did read in depth the summary of the plan."

Comments specific to the "public scoping and Stakeholder Survey Results" section of the Draft CCP/EIS included, "To quote the survey researcher: 'There was a perception by the Refuge and planning staff that stakeholders did not clearly understand the important management objectives and potential future changes in management that were likely to be put forward in the draft CCP (p. 29).' To judge from the reception at Errol during the two meetings I attended this summer, I would suggest that most if not all of the townspeople were not aware of any of the details of the plan until it landed on their desks, all 500 pages or so of it. And if they weren't, I cannot imagine that any of the non-local stakeholders were either."

Relationship to Other Planning Processes [1.3]

Other planning processes, both by the FWS and other entities, and their relationship to the Draft CCP/EIS were discussed by a few commenters.

One respondent discusses a National level U.S. Fish and Wildlife Service planning effort, “Refuges 2003” and its relationship to the Draft CCP/EIS, “The FWS has effectively admitted that its NEPA compliance on Refuge hunting and, indeed, all Refuge recreational and use activities, is lacking given its failure to ever complete its Refuges 2003 Plan and EIS (herein incorporated by reference). That Draft EIS, which was published on January 15, 1993 conceded that the NW Refuge System was experiencing a crisis in terms of increased use, increased damage to biotic and abiotic resources, increased user conflicts and, specifically, identified a number of potential adverse impacts associated with refuge hunting programs To date, no final EIS has been published nor has the FWS explained the status of Refuges 2003 or why it has apparently elected to halt the process midstream. The FWS cannot, on the one hand, initiate an EIS process conceding that the environmental impacts of hunting and other Refuge uses have not been adequately evaluated only to, on the other hand, halt the process and then continue to open Refuge after Refuge to hunting with no substantive analysis of the Refuge-specific or program-wide impact of the activity on wildlife or the refuge system itself...”

Some respondents discuss the connection between the FWS CCP/EIS and regional planning processes. “. . . they will better be able to manage and protect species that have been identified as valuable for the region. The borders of the refuge lie within the Atlantic Northern Forest Bird Conservation Region, a landscape-wide conservation plan. Waterfowl especially is a focus of Lake Umbagog and it is one of the conservation focus areas for the ANFBC.”

Some respondents mentioned specific planning documents that were not mentioned within the “Conservation Plans and Initiatives Guiding the Process” section of the document. One respondent stated, “We were pleased to see reference to the state's Wildlife Action Plan and Forest Resources Plan. However, we were disappointed not to see the Northern Forest Lands Study and Finding Common Ground, the Report of the Northern Forest Lands Council, not included as well (although in the Appendix and bibliography). This has provided significant guidance over the years and has continued to be a focus of conservation planning with the 10th Anniversary Forum Report completed in 2005.”

The FWS’s interpretation of the Northern Forest Lands Study of 1990 (A-5) was discussed by one person who is “concerned that the Service's interpretation of these priorities/goals differs significantly from the interpretation of interested local stakeholders. . . . Who is to say that these amounts of protection are inadequate going forward? It would seem that local and state governments and agencies would probably have a better handle on what is suitable for the area than the bureaucracy in South Hadley or Washington.”

One respondent discussed the relationship of the Draft CCP/EIS to the NH Wildlife Action Plan. “By agreeing with the vision of the USF&WS to expand both consumptive and non-consumptive uses at our Refuge, NH F&G is short-changing our own new, statewide, comprehensive Wildlife Action Plan (WAP) by failing to make the Refuge a place with minimum human disturbance that would facilitate the maximum implementation of our WAP.” The respondent further states, “. . . stop the collusion between NH F&G and the U.S. Fish & Wildlife Service (USF&WS) to prevent adoption of plans for the Lake Umbagog National Wildlife Refuge (the Refuge) that would bring fur trapping to the Refuge and greater hunting, fishing, and other activities that would undermine the strategies of our WAP, a plan to prevent common species from becoming rare, prevent rare ones from becoming

threatened and endangered, and prevent threatened and endangered ones from being extirpated or extinct. . . . The WAP speaks of minimizing human disturbance and the harm it brings to wildlife, yet the USF&WS plan speaks of nearly doubling visitation. The WAP strives to help bobcats and pine martens recover their populations, while the USF&WS plans to allow them to be hunted or trapped. While the WAP speaks of maintaining natural beaver impoundments and flowages, the USF&WS would have open season on beavers and would relocate beavers at will of the refuge manager. The WAP speaks of the poisoning of wildlife like loons by lead released by hunters and anglers into the environment, while the USF&WS does not propose to totally ban possession of lead tackle at the Refuge.”

Statutory Authority [1.4]

National Wildlife Refuge System Improvement Act (NWRISA)

The authority of the Refuge Improvement Act and its role in refuge planning was discussed by several respondents. “The Refuge Improvement Act mandates that wildlife come first in refuge planning. This goal is echoed in the Fish and Wildlife Service publication, *Fulfilling the Promise*, which also emphasizes that planning address biodiversity, ecosystem level conservation, and wilderness preservation as vital concerns in wildlife management,” stated one respondent.

Specific requirement provisions established by the Act were discussed by some commenters. One citizen stated, “Among the most important provisions of the Refuge Improvement Act is its requirement that the Secretary of the Interior ‘monitor the status and trends of fish, wildlife, and plants in each refuge’ (16 U.S.C. 668dd (a) (4)(N)). A strong monitoring and evaluation program is the key to good refuge management. Consistent, systematic monitoring will help refuge staff to assess the effects of their actions and provide them with the knowledge necessary for flexible management. We recommend that an effort to inventory, monitor, protect, and enhance habitat for ALL refuge species is outlined in the CCP.”

Some respondents cite specific allowed public uses within the CCP/EIS and question the compatibility with the Refuge Improvement Act. One respondent concludes, “We disagree with the determination that snowmobile use is compatible with the purposes of the refuge. . . . The Refuge must assume that snow machines used in the Umbagog Refuge will cause the same noise, air, and water pollution that have been attributed to them elsewhere in the United States. These latter adverse impacts to the refuge’s ecological integrity are reason enough to prohibit these machines. . . . Moreover, the Service provides no evidence in support of its contention that snowmobile access to the Umbagog Refuge is at all related to those priority public uses. Motor-dependent winter travel seems, in most instances, to be the recreational end itself, not a means to achieving a greater appreciation or awareness of wildlife, their habitats, or their role in the broader landscape. . . .” The respondent further states, “The Act clearly and strongly states that a refuge is not opened for use until the particular use in question is determined to be compatible with the goals of that refuge and the Refuge System. According to the Act, the term ‘compatible use’ is defined as ‘a wildlife-dependent recreational use or any other use of a refuge that, in the sound professional judgment of the Director, will not materially interfere with or detract from the fulfillment of the mission of the System or the purposes of the refuge. . . .’ (16 U.S.C. §668ee (1)).”

The allowed use of hunting is also criticized; “While the FWS apparently believes the National Wildlife Refuge System Improvement Act (NWRISA) provides it carte blanche approval to allow sport hunting on Refuges, the Act retains and reemphasizes the compatibility requirements and imposes other standards that require more, not less biological and ecological evidence to support decisions to open refuges to sport hunting activities.”

Allowed uses and future land management of acquisition lands is a concern; “Refuge expansion will greatly increase the likelihood of wilderness quality lands at Umbagog. In order to best meet the needs of shy and sensitive species such as the lynx, and to meet the intentions of the Refuge Improvement Act, the Service should not predetermine the future management of acquisition lands. Land worthy of refuge ownership should be managed with the needs of wildlife which may suggest closing existing roads and prohibiting motorized recreation.”

Wilderness Act

Some commenters discussed the “Conducting a Wilderness and Wild and Scenic River Reviews” section of the Draft CCP/EIS. “We agree with not analyzing the Refuge for suitability for Wilderness designation. We also agree that wild and Scenic River designation would require a comprehensive process outside the scope of this Plan.” Conversely, one respondent cited the Wilderness Act and offered this criticism, “... The Service’s laws and policies require that wilderness reviews be conducted as part of the CCP process and we commend the draft CCP for addressing wilderness albeit an insufficient review. Page D-2 states ‘none of the WIA’s in the Lake Umbagog National Wildlife Refuge are large enough to meet the size criteria for a WSA. Therefore, the suitability of these lands and waters for wilderness designation is not analyzed further in this CCP.’ The decision to use size as a reason not to further analyze the wilderness potential at the refuge is misguided. In 1993 (1) (2), there were 73 wilderness units smaller than 5,000 acres...”

Endangered Species Act

One respondent states that the FWS has allowed hunting, which could adversely impact endangered species, without following procedures required by the Endangered Species Act. “Section 7 of the ESA required that each federal agency shall ‘insure that any action authorized, funded or carried out by such agency . . . Is not likely to jeopardize the continued existence of any endangered species...’ 16 USC Sec. 1536(a)(2). To comply with this mandate, before taking an action which may affect listed species, the FWS must first engage in formal consultation with any agency taking such action and produce a Biological Opinion which details the steps necessary to avoid jeopardy. Id. Sec. 1536(b). . . . If the action will result in a ‘take’ of listed species, the Service must provide a take statement identifying what level, if any, of take will be permitted. . . . The ESA prohibits an agency from proceeding with a project which may impact listed species before the analysis required by Section 7 is complete. 16 USC Sec. 1536(c)(1) BA must be completed before project begins.”

Migratory Bird Conservation Act

One respondent questions funding used for land acquisitions, “...as indicated in the CCP, the funds used to acquire lands for the Refuge was either from the Land and Water Conservation Fund, or the Migratory Bird Conservation Fund. The use of these funds includes certain restrictions or requirements. We have been unable to confirm that the following have

occurred, and request that the Refuge verify and provide evidence of compliance with these statutory requirements, pursuant to the Migratory Bird Conservation Act, as amended (see 16 U.S.C § 715f 715k-5 and 715o). . . . We respectfully request documentation indicating that the Maine and New Hampshire legislatures and governors, as applicable, have approved the acquisition of lands within the FERC project boundary for the purposes of the Refuge, and their consent to the proposed determination that portions of the FERC project site be placed within a migratory bird reservation. . . .”

Jurisdiction (1.5)

Several respondents request clarification of the document’s discussion on management of “open water” which they believe to be outside of FWS jurisdiction. These comments ranged from the general, “I still would want you to reiterate that you have no control over the open water” to the specific, “Goal I of the CCP (see Sum-6) needs to be revised to delete reference to managing the ‘open water’ unless the Refuge can clearly demonstrate that (1) it has the authority to do so, and (2) the benefits of it taking control over the lands and waters within the FERC project boundary clearly outweigh adverse impacts resulting from a Federal taking which is not currently authorized nor consistent with Service policy.”

Management jurisdiction tied into monitoring and research efforts, for one respondent who stated, “In my brief perusal of the draft CCP, I was not able to find statements and maps explicitly detailing ownership and rights associated with all areas of open water on Lake Umbagog. Uncertainty about LPC’s access to certain areas of Lake Umbagog has hampered LPC’s long-term monitoring and research efforts on Umbagog, and has ended a long-term intensive monitoring effort on the lake that would have continued to benefit the Refuge, the USFWS, the scientific community, and loons on Umbagog.”

One respondent cited specific sections of the document that they view as an “over-reaching assertions about the extent of its current ownership authority of Lake Umbagog” and further states that “current assertions in the CCP about its land acquisition history and the Refuge purposes with respect to Lake Umbagog is in conflict with the 1991 EA.” Specific items of contention include:

- fee acquisition, “‘all rights of ownership’ by virtue of so-called ‘fee’ acquisition”;
- flow rights “...proposals seek to return the lake to more natural levels or flows . . . proposing a substantial and direct interference with FPL Energy’s flowage rights...”;
- lake levels “the Refuge’s CCP now outlines intent to assert more authority over lake levels. . . this intent is totally inconsistent with the Refuge formation documents”;
- access and public use, including the proposed Umbagog Working Group, “Public use and access throughout the lake and surrounding area is the subject of some discussion and the CCP indicates proposals for its management by the Refuge.. FPL Energy, however, has responsibilities to manage public use within the Project Boundary under its FERC license. Therefore, FPL Energy objects to any attempt by the Refuge to “manage” those activities over which FERC has jurisdiction.”

Dam Operations

Several respondents commented on Lake Umbagog and its role for water storage and flood control within the Upper Androscoggin River Basin. The respondents commented on the challenges of balancing dam operations for water storage and flood control against desires for a variety of wildlife habitats, lake and river recreation opportunities, and a working landscape for local economies. One respondent commented that the “Lake Umbagog NWR is in a unique position to evaluate the effects of the current FERC operating license on wildlife. Monitoring and studying these effects on Lake Umbagog will be invaluable when FERC licenses are scheduled for renewal on many large Maine lakes in the early 2020s.”

One respondent commented that current dam operations and water releases provide a water source, water storage, and flood control for paper mills along the river below Lake Umbagog. Other respondents feel the dam should be managed for a uniform lake level.

A lakeshore property owner commented on the changes observed since 1976 with dam operations and lake level. “Over that period of 31 years, we have noticed a definite change in the control of the water level by the dam keepers. Natural flows used to rise and fall with the amount of rain, and as the summer progressed and river flows lowered, the lake almost always dropped considerably. However, in recent years, the levels are no longer natural.” This respondent cited observed changes to the local ecology because of changes in dam operations; “On our Island trees that used to survive a few weeks of high water each spring have drowned. Cranberries are less and less available. Moose now stay inland and away from the lake because the food source is no longer available in the shallow waters.”

One respondent commented that changing current dam operations and downstream water levels, the 7Q10 flow, might require modifying the pollution discharge levels currently allowed by permitting agencies; resulting in “major operational changes or major investment requirements for the affected parties.” The respondent felt the EIS does not address the significant impacts of changing dam operations.

Implementation [1.6]

Few comments were submitted that specifically addressed implementation; most comments are included under specific headings in this document. The general sentiment can be demonstrated by the following comment, “Use funds allocated for better implementation of Plan A and for educational / recreational programs to benefit the local population and visitors alike. For example: properties purchased over the past several years have both obstructive downed trees and household trash of all types still on the properties because they have never been cleared /cleaned up.”

Agency (General Comments, Including Trust and Integrity) [1.7]

Respondents praise the FWS staff and their efforts. These respondents trust the agency to make appropriate land management decisions based on professional expertise and believe that “LUNWR is being properly managed”.

Other respondents question the intent of the agency, and some feel that the current and proposed management is contradictory to the purpose of a Refuge. Respondents lack confidence and trust in the current staff and feel that the agency does not care about public opinions. “There were some of the comments in the [stakeholder] survey results that lead me

to believe the planners paid scant attention to the public.” Another commenter stated, “This distrust comes from many different factors over the years that you have been here... mistreatment of the locals, mismanagement of the land that you already have, and personal/professional conflicts of interest within the refuge. For example, there are many projects that you set out to do and have not yet finished. And, from the beginning, the local people were told our way of life wouldn’t change. Yet, more recreational restrictions have come from your agency over the years with no clear explanations.” Mistrust of the land acquisition process was also cited by some; “the ‘Errol’ people thought you were trying to ‘take their land’.”

A few respondents offered advice on building trust, “Although I understand your interest is in the wildlife and the protection of the wildlife, it may be necessary to educate yourselves on other important issues in the area in order to become more well informed and connected to the community. Work to gain knowledge of the area, its history and its people, rather than just the wildlife. This would be a giant step in forging good public relationships and building community trust.”

Coordination and Consultation [1.8]

Several respondents applaud the FWS commitment to partnerships and encourage the proposed “Lake Umbagog Working Group.” One state government agency stated, “We appreciate the opportunity we had to participate on the core team during the plan development and look forward to continuing our good working relationship with the Refuge as the CCP is implemented.”

One respondent stated, “The recognition here of cooperation between the states of New Hampshire and Maine, timber companies, conservation organizations, private landowners, local elected officials, and town and community leaders is noted and appreciated.”

Conversely, one commenter claims the CCP “fails to reflect [our] continuing coordination of and participation in studies and activities to conserve environmental resources on Lake Umbagog. . .”

Coordination with elected officials at the local, county, and state levels and other government agencies was encouraged by many respondents. Collaboration with conservation groups to meet the Refuge’s land acquisition proposals was also encouraged. One respondent further encouraged collaboration “to achieve the large habitat block goal, even if those blocks are not actually acquired by the Refuge.” Multiple groups offered services and expressed interest in developing a partnership with the FWS.

One commenter outlined specific goals for the proposed Lake Umbagog Working Group include, “1. implementing a cohesive set of law enforcement objectives and protocols with all law enforcement authorities with jurisdiction on water and land; and 2. Developing a comprehensive watershed plan for the Lake Umbagog watershed to inform all government and non-government stakeholders in the watershed on how to best coordinate resource planning and management in the watershed. The draft CCP provides rich material for such an initiative, and the Refuge staff would be a very valuable resource for the development of such a plan.”

Disappointment in the failure of a former collaborative effort to research loon populations on Lake Umbagog was the focus of one commenter’s input.

Document (Clarity, Technical, and Editorial) [1.9]

One respondent requests a map of all existing roads and the planned removals and maintenance be added to the document, “to determine future recreation potential under the expansion alternatives.” Respondents also provided editorial suggestions. For example, “Objective 3 (pp. 2-58+): Perhaps standing dead wood is included in your concept of coarse woody debris, but for many people, debris implies that it is on the ground. We suggest also including ‘standing dead wood’ in the various places where you refer to live cavity trees and coarse woody debris.” and, “The statement ‘Costs associated with public fishing are estimated below.’ at the top of page C-75 is clearly an error . . .the page involves Compatibility Determination regarding recreational berry picking..”

Purpose and Need [2.0]

Refuge Vision and Goals [2.3]

Refuge Vision and Goals received numerous comments. One group of respondents commented on the need to protect and preserve publicly held properties in pristine condition; in trust for current and future generations. This group of respondents supports “a Fish & Wildlife purpose and vision for this Refuge to protect its wildlife and management for the next fifteen years and perpetuity.” Several of these respondents questioned the compatibility of logging, shooting, road construction, oil drilling, development of homes or businesses, and thrill-craft and snowmobile use with Refuge vision and goals. “Lake Umbagog National Wildlife Refuge was established in 1992 with the primary purposes of protecting wetlands and wetland associated wildlife and to protect migratory birds. Hunting, fishing, and trapping are completely at odds with real conservation of our nation's natural places.”

A second group of respondents support a broad Refuge Vision and Goal. “The inclusion of Goal 6 is very good and I commend the USFWS for including this context and the statement ‘Those concerns underscore the need for partners who will work together to permanently conserve the ecological integrity of the Northern Forest, preserve public recreational opportunities in and promote the economic sustainability of a forest-based economy’.”

Several respondents expressed concern related to land acquisition and the mechanisms the Refuge may use to acquire lands. The inclusion of Goal 6 in the Draft CPP, “captures well the original purpose for acquisition however the original partnerships were not sustained and the USFWS now holds these acreages in fee. This raises the question of how sustainable the partnerships are in the future and what happens when partners drop out”. Other comments related to funding mechanisms include, “Easements are important in their role of maintaining the working landscape while preventing these lands from being developed and are an essential component of the overall expansion plan. In analyzing the proposed expansion, full consideration must be given to the fact that the working forest lands under easement would in all likelihood, eventually be held by the USFWS in fee. There is a history of lands being identified as easement ending up in fee ownership by the USFWS in the current Refuge”, and “We would also urge that other public ownership options be explored to meet the shared conservation objectives within the proposed acquisition boundaries. This would help to alleviate the opposition to federal ownership while showing the commitment of the USFWS to the larger conservation objectives and needs for the Northern Forest region. This would

mean further development of Option 2 in the Appendix, "Management or Acquisition by Others".

One respondent questioned how the Refuge was going to balance the objectives in Goal 6 and a working landscape. "Maintaining the economic sustainability of a forest based economy is not within the stated mission of the USFWS. Therefore, the proposed expansion of the Refuge creates a significant challenge in being able to balance the three objectives above (ecological integrity, recreation, and forest based economy) because of the limits contained in the agency mandates. However, if it is at all possible to incorporate practicing sustainable forestry and contributing to the forest based economy clearly as a legitimate goal in the Refuge, it would go a long way in addressing concerns about future expansion. The respondent asks, "What experience does the USFWS have in acquiring and holding working forest conservation easements in the Northern forest region?" Another respondent concerned with Goal 6 states: "We believe the CCP should anticipate and acknowledge the likelihood that increasing demands for renewable energy will have impacts on the Northern Forest."

One commenter requests the FWS acknowledge the proximity of the Bartlett and Hubbard Brook experimental forests (US Forest Service) and coordinate research efforts, as part of Goal 7.

As part of Goal 3, respondents "suggest establishing specific areas within each of the three forest types that will not be subject to active forest management. . . . At minimum, we request that such areas be identified for the Spruce-Fir habitat type."

Monitoring and Evaluation [2.6]

Several respondents expressed concern for statements in the Draft CPP and EIS that appear to make unrealistic assumptions and promises about time lines, project completion, monitoring, and research projects. "The goals enumerated in the plan may seem results-oriented, but a far more telling test is: are they realistic?"

One respondent states, "We fully support these efforts and the cooperation with NHNHI (which resides in our agency) but would encourage you to conduct an inventory earlier than 7 years and in advance of any timber management or other activities that might negatively affect these communities."

One respondent recommends using focal species suites instead of focal species, as a monitoring tool. "We believe that focal species suites can provide a more comprehensive picture of overall habitat quality in matrix forests. Such suites reasonably include nesting guilds at a minimum, and can also consider late- and early-successional forest specialists and forest type specialists (i.e., species that require hardwood forest or spruce-fir forest). Assuming that focal species data will be collected using point counts, monitoring species suites would not require any additional field work. Point count data could be analyzed to determine collective species richness and abundance for each suite, providing a more comprehensive approach to monitoring changes in habitat quality (hopefully improvements!) over time."

In response to the allowed use of snowmobiles, respondents "recommend that an effort to inventory, monitor, protect, and enhance habitat for all refuge species is outlined in the CCP. Critical to the process is the Service's responsibility to correlate the public uses on the Refuge with their impacts on the Refuge's wildlife species. . . . The final CCP should include

data specific to Umbagog snowmobile use and its impacts. . . The needs of species such as the lynx need to be evaluated and monitored.”

Cumulative Effects [2.7]

Cumulative effects analysis was requested by respondents. “FWS must fully analyze the site-specific and cumulative impacts of all proposed activities affecting the environment and wildlife inhabiting the refuge, which this CCP and EIS have failed to do.” Another respondent stated, “The proposed CCP must take into account not only the effects of hunting on other wildlife species in the Refuge, but also the cumulative impacts of hunting on wildlife, migratory birds, and non-hunting visitors to Refuges throughout the Refuge System before permitting hunting to continue via CCP.”

Alternatives – Chapter 2

Alternatives [3.0]

One commenter complimented the Refuge staff on the development of the alternatives stating, “The process the planning staff used to develop the Alternatives was exemplary. The Alternatives are based on science and a systematic review of lands and ecological processes both within and around the Refuge; they adhere to the Goals of the Refuge; they reflect existing, widely endorsed wildlife conservation planning efforts (i.e. PIF plans); and they address the Refuge’s natural and recreational resources in a manner that reasonably balances the interests and needs of people and nature.”

Public responses voiced displeasure with all of the alternatives as represented in the following sample quotations; “I believe the majority of people that attended any of the meetings held would not choose any of the 3 plans A, B, or C. Though it is obvious that if we the people had to vote on one, plan A is what the people would vote for...”

Some people responded with general comments saying they preferred an alternative which combined certain aspects of two or more of the proposed alternatives, “Perhaps some of the language of Alternative A might be added to Alternative B so as to read ‘We would continue to protect the refuge from external threats, monitor its key resources, and conduct baseline inventories to improve our knowledge of the ecosystem.’” and “Although I favor the habitat management policy of Alternative B, I prefer the larger boundary configuration of Alternative C. (I do not support Alternative A.)”

Alternative A: Current Management [3.1]

Of those respondents supporting alternative A, their reasons were varied. Some comments were simply general approval while others cited specific reasons for displeasure such as an increase in new regulations, a reduction or denial of public access, and the sentiment that the Refuge should effectively manage its current land base before expanding.

For example, representative general quotes include, “I support Alternative A – current management.” and “Remember plan A is what we the people want, not what the Refuge

wants. Plan A seems to be the plan that most of the people who attended the Errol meetings are in favor of plan A....”

Respondents supported Alternative A because of concerns of increased regulations, “I prefer to leave everything as it is. I am undecided if we really need a refuge or its rules/guidelines. The area has been a wildlife area for hundreds of years and continues to without additional rules. The NH state rules area sufficient to maintain the area without destruction.” and “Both my wife and I are partial owners of 2 camps in Chapel Hill... we have been going to the camps since we were kids and for nearly 50 years... we have learned to enjoy and respect the outdoor and wildlife. ... It is for this reason I am writing to ask you not to increase restrictions on use of the land in the area. If option "A" is the least restrictive, then I vote for option "A". My preference is to not place any more restrictions. As recently as last month President Bush asked all government again as to see how they could "increase" access to wildlife. Your efforts to increase restrictions seem contrary to President Bush's directive.”

One commenter was concerned with rights to their land and wrote, “Please choose plan A. People have rights to their land.”

Respondents also voiced concern that the Refuge has not effectively managed the land it has already acquired, and therefore supported Alternative A: “Plan A needs to be fulfilled and completed first. Spending the funds appropriated for the project on Plan A programs and improvements seems more appropriate.” and “Therefore, I respectfully write to support Option A, and oppose Options B and C. The timber companies and local land owners have been good stewards of this land for many generations. There is little if any serious evidence of a commercial development threat to the additional land the Refuge proposes to buy. It is too often the nature of the Federal Government to continually grow, to continually seek to "acquire" more and more employees, buildings, land, and ultimately, taxpayer dollars. Let it stop here, at the existing Refuge borders - at least for the time being. The Department of the Interior should first get it right with the Refuge property it already owns. Then, in another 10 years, it can revisit the question of whether further protection is needed, and whether government acquisition of more private property is the solution.” and “We are owners of a cottage on Lake Umbagog and have been for 30 years. We have attended your meetings and information sessions and want to reiterate our very strong choice of "Alternative A". We do not want to see any further changes on the lake and feel very strongly that the Fish and Wildlife Service needs to make the needed improvements on the current property and not get involved in more land and issues. ...”

One respondent stated, “I recommend that the Service consider Alternative A, with the addition of creating the working group as the first activity undertaken, and that some of the above activities such as hiring a forester be delayed, and explanations of others such as protecting loon nests in spring and summer, and retiring and restoring unnecessary forest interior and secondary roads (5-year goal) be amplified. Again, I recommend no change Alternative A until the working group is created and has a chance to weigh in with local perspective, zoning, and development restrictions, assisted by the federal government rather than dictated to.”

Similarly, a writer approved Alternative A until partnerships are formed between the Refuge and local groups: “I honestly think ‘A’, until we can go forward with some public and private

partnerships to try to resolve some of things instead of having confrontations and ill feelings in all of our communities.”

The Mayor and City Council of Berlin unanimously supported Alternative A: “Please be advised that the Mayor and Council of the City of Berlin last night at their regular Council Meeting voted unanimously to support Alternative A, the ‘no action’ alternative, listed in the Draft Comprehensive Conservation Plan for the Lake Umbagog National Wildlife Refuge. If you need any additional information, please do not hesitate to contact me.”

A respondent also felt the animals can take care of themselves and don’t need government intervention and wrote, “I believe enough money has been spent protecting the wildlife in the area which I think would have been all right without the Government's involvement. I recommend Alternative A for that reason.”

Increased numbers of eagles, black ducks, and ring-neck ducks motivated a commenter to approve of Alternative A writing, “One of the original reasons for the refuge was to protect Eagles and Black Ducks. Now, the Eagles are no longer endangered, and according to the website, estimates for American Black Ducks and Ring-necked ducks are now significantly above their long term averages. So, it sounds like whatever you are doing in Plan A, as it stands right now, is working.”

Conversely, other commenters disapproved Alternative A because of its lack of vision in habitat protection: “The “No Action” Alternative A or the compromised Alternative B does not have any sense of improvement in the long term. As far as the extra land is concerned, ‘the more, the merrier’ in every single aspect.” and “Alternative A should not be under consideration, as it forecloses our options to help protect wildlife (both game and non-game), timberlands, and recreation corridors.” and “We do not support the no-action planning alternative. Current regional trends already show that this alternative will lead to increasing subdivision of traditional timberlands, loss of habitat and wildlife, and reduction of public access and use.”

Alternative B: Service-preferred [3.2]

Representative examples of general comments concerning Alternative B are, “We are in support of Alternative B plan for the National Wildlife Refuge.” and “I would like plan B, as you would like.”

Commenters support Alternative B because of protection of tributaries, habitat, biodiversity and biological integrity: “... supports Alternative B as its highest priority is to protect the biological integrity, diversity and environmental health of Lake Umbagog and its associated rivers and tributaries.” and “From our own perspective we would urge that you place the highest priority upon the preservation of water quality and wetland habitat of the region, even if this requires the eventual protection of all sections of the drainages that feed the lake. We support the management policies laid out in the Alternative B of the proposals your team has put forward but we also prefer the larger boundaries suggested in Alternative C.”

Some respondents liked the expanded educational proposal writing for example, “Having reviewed the alternatives, I endorse the service-preferred alternative, Alternative B. I believe that it is the most reasonable alternative at this present time and I endorse the expanded interpretive/educational proposals

A person voiced approval of Alternative B with allowance for traditional uses of the Refuge saying, “I am in favor of Alternative B as long as traditional uses will be allowed. I feel the additional acreage will protect the lake and wildlife from runoff and contamination from possible development.”

Several people support Alternative B as a means to thwart development along the shores of Lake Umbagog: “We would like to voice our support for the Alternative B of the Lake Umbagog National Wildlife Refuge Draft Comprehensive Conservation Plan. We have often canoed on Lake Umbagog and the Magalloway River and enjoy observing wildlife and the natural unspoiled beauty of the area. In the face of the continuing development pressure throughout the nation, we appreciate and support the efforts of the U.S. Fish and Wildlife” and “.....I can see in ten years if the wildlife preserve is confined to its existing area that these other areas will be bought up by outside developers who will put in sub-divisions, homes, vacation resorts and things like that and do you think they are going to let you hunt on their land or run their snowmobiles on their land or your ATV’s? I doubt it. And I think our best bet is what the wildlife preserve people are planning.”

Alternative B enhanced the quality of recreational activities according to one respondent who wrote, “We support Alternative B, Focal Species Habitat Management. It will substantially and appropriately increase the size of the refuge, and places high priority on protecting the biological integrity, diversity, and environmental health of both the Lake and its rivers and tributaries. In addition, this alternative appropriately emphasizes habitat enhancement for species of regional conservation concern. Finally, and this is important to us as well, this alternative will also enhance the quality of recreational activities that are dependent on wildlife.”

One person supported Alternative B, but felt it was too bureaucratic saying, “The next best is Alternate Plan B, however, Alternate Plan B seems a bit heavy on bulking up the bureaucracy and putting up buildings, which I do not think is as important as acquiring and preserving acreage.”

Alternative C [3.3]

Some general comments stating approval of Alternative C are: “Full steam ahead on Alternative C.” and “It is my belief that in the case of the Umbagog National Wildlife Refuge, Alternative C will provide the best protection for the refuge, as long as you consider not just the inclusion of an additional 76,000 acres but that it continue to be managed for wildlife. The number of acres protected in your refuge is so insignificant, and should be exclusively managed for wildlife, and if necessary, to the detriment of human beings. This fits your mission” and “We urge the USFWS to embrace Alternative C which is ecologically sound over the long term for the reasons enumerated by the proposal. As we’ve seen first hand, this area is ideal habitat for wildlife and it would be a crime not to do everything possible to protect the watersheds that surround it.”

A few respondents see Alternative C as the best alternative to offset development and industrial logging for example writing: “Protecting Lake Umbagog and expanding the reach of that protection is critical for not only the fauna and flora of the region, but also for the assurance of it's economic future. Industrial logging, followed by development, are clearly not the answer for the region and only take us down a dreadful path from which there is no

return. In light of the depressed economy of the area I certainly understand the economic pressure for commercial development, but I also see the untapped potential that eco-tourism and outdoor recreation have to offer. While I am not so naive as to think that change will not come, I believe that your Alternative C addresses these challenges and I wholly endorse it.”

One person was concerned that the current Refuge size is too small to promote ecological integrity; a larger refuge would also allow less intrusive management and wrote, “I would like to comment on the draft Lake Umbagog Comprehensive Conservation Plan. I am particularly concerned about the small size of the current refuge compared to the watershed territory which impacts the Lake. I am also concerned about protecting sufficient territory to assure diversity and viability of species in the related Northern Forest ecological zone. For these reasons I urge the adoption of Alternative C. Alternative C, focused on Ecological Integrity, would do the most to benefit wildlife and conserve habitat, which are central elements of the refuge concept. It offers the greatest benefit to hydrology, soils, and air quality. Although it is a more subjective judgment, I also believe that less species management as proposed under Alternative C, is better for long term ecological health than the more intrusive management proposed under Alternative B. Alternative C also offers the greatest benefit to the local economy in terms of jobs and income, which is an important consideration in offsetting the economic impacts of expanding the refuge.”

Alternative C seemed the best option to create hydrologically connected habitat to a person who wrote, “While I believe that Alternative B satisfies the bulk of the above concerns, I do support Alternative C's goal of creating contiguous blocks of hydrologically connected conservation habitat greater than 25,000 acres, and I would set that goal at a higher priority than extensive visitor facilities.” A similar comment voiced that Alternative C would best ensure healthy rivers entering the lake: “Based on the summary document of alternatives A, B, and C. I vote for C. In my view, the larger the expansion of the refuge, the better (alternative C = 76,304 acres; alternative b = 49,718 acres). Many of the same goals can be accomplished with alternative C when compared to alternative B. An expansion of the acreage would ensure healthy rivers and tributaries that enter into the lake, and help protect NH's largest and most contiguous undeveloped body of water that is also part of the Northern Forest corridor.”

Respondents favored Alternative C to protect land for future generations: “Alternative C makes the most sense, with the following modifications: I support Alternative C's land acquisition plan: buying the 76,304 acres landowners are willing to sell. It is critically important to manage the refuge in ways that allow for natural ecological processes and to ensure that this entire ecosystem remains wild for future generations.”

Some commenters feel Alternative C is detrimental to the local economy writing for example: “From my above concerns and feelings you can imagine I do not like any of the three plans. In Plan C I for see the economy literally going down the tubes as the people's way of life and means to making a living disappear as the result of more and more land being acquired by the Feds. I can see the only people who could afford to live in the area would be out-of-staters who make high wages and want second homes. I also for see, the ‘current use’ of the Federal land being quite limited and not what we the locals currently enjoy.”

Actions Common to all Alternatives [3.4]

One general comment stated that they agreed with those actions common to all alternatives.

Another commenter approved specifically citing protecting vernal pools, implementing biological monitoring, and expanding Floating Island National Natural Landmark: “We support the actions common to all of the alternatives, particularly protecting vernal pools and other unique or rare communities, expanding and protecting the Floating Island National Natural Landmark, and implementing and prioritizing a biological monitoring and inventory program. We hope that opportunity will exist for our staff to participate in the process of developing the priority list of monitoring and inventory needs for the 15-year planning cycle.”

Actions Common to Alternatives B and C Only [3.5]

Several people made general comments in support of both Alternatives B and C and requested a hybrid alternative that combined elements of both alternatives reflected in the following comments: “More importantly, let me express my support in particular for Alternatives B & C in the plan. To be honest, what I think I would prefer the best is a hybrid of these two options - something that combines the management practices from Alternative B with the larger boundary and greater use of fee interest acquisition from Alternative C.” and “Here are some comments on the Lake Umbagog National Wildlife Refuge plan revision. My preference would be a plan that lies somewhere between alternatives B and C, as I believe that would provide a good mix of wildlife habitat, recreation and economic benefit.”

A respondent supported both Alternatives B and C but asked why Alternative C could not use easements and wrote: “I support Alternative B and C. But I do not understand why Alternative C cannot include some of the priority habitat enhancement identified in Alt. B, possibly saving money. Why does Alt. C not include use of easements? Was it merely written this way to make Alt. B more attractive? I have not read the entire EIS, and this information might be in there. What is the estimated cost of the habitat enhancement in both alternatives? This seems to be a huge component that is needed to clearly understand the project's alternatives. I see the overall costs are found on page Sum-31, but they are not defined by work or purchases. It would seem that Alt. C would be far cheaper if easements could be used.”

Another commenter applauded forest management on the Refuge, but suggested the stated volumes in Appendix K are too low, writing: “Implementing Forest Management to Achieve Habitat Objectives: We fully support the plan to generate timber off the Refuge and the effort to increase softwood cover. The ‘Forest Management Guidelines’ in Appendix K. are look to be appropriate to meet the stated objectives. However, our experience and opinion is that the volumes per acre proposed for each entry are too low to sustain a commercially viable operation in the softwood and hardwood. Generally on state lands, a commercial harvest of 6 to 8 cords to acre. If these harvests are not commercially viable, it raises the question as to if sufficient resources will be available to carry out the Plan.” The commenter also suggested the Refuge utilize current publications to aide in forest management: “We commend the use of existing publications currently used by the States such as Good Forestry in the Granite State to guide forest management.”

Alternatives or Actions Considered but Eliminated [3.6]

A respondent who commented on this section in the Draft EIS/CCP wanted the Refuge to reassess its stance to not manage its forested lands similar to commercial private forestry and wrote: “Manage the refuges' forests for present net value and operate similar to a commercial private timber company: While we agree that this is not appropriate as the primary driver for forest management on public lands there are appropriate reasons between profit and wildlife habitat to manage for timber on public lands. These are captured in our agencies mission above. First, public lands are important in demonstrating good forest practices and are the most capable of ensuring the conservation of multiple resource values (including wildlife) while producing timber. Secondly, the timber produced off of public lands is important in supporting the forest products economy in the region. Lastly, the revenue provided from timber sales can be used to support the management of public lands. To disassociate the need for funding to manage public lands from the management of those lands is not good public policy.”

The same respondent also placed the following comment concerning Boreal Fens and Bogs into this category and suggested: “With respect to the specific strategies to protect and manage Boreal Fens and Bogs, Northern White Cedar, Scrub-Shrub Wetland, Wooded Floodplain, Lakeshore Pine-Hemlock Fen and Flooded Meadows, I would urge you to work with the Division's Natural Heritage Bureau in the future. While the Bureau did provide information to support the development of the Plan, we did not have the time and resources to do a full evaluation of the strategies.”

Range/Comparison of Alternatives [3.7]

One respondent suggested setting aside a large acreage natural area by writing: “I would encourage you to set aside a ‘large acreage natural area’ as proposed in ‘A’ and see what occurs naturally within the refuge. This will allow for appropriate research as a ‘natural area’ and allow for comparative data collection from a managed area.”

A respondent wanted the Refuge to analyze a full range of alternatives for each alternative: “In addition, in preparing the CCP and NEPA document, the FWS must analyze a full range of alternatives to the proposed action, including the hunting component of the Plan. This includes considering alternatives to sport hunting for achieving the FWS's management objectives for the Refuge and the wildlife that use the Refuge. NEPA requires federal agencies to ‘study, develop, and describe appropriate alternatives to recommended courses of action.’ 42 USC Sec. 4332(E); 40 CFR Sec. 1508.9(b). NEPA's alternatives analysis is ‘designed to insure that an agency's single-minded approach to a proposed action is tempered by the consideration of other feasible options that may have different (and fewer) environmental effects.’ *Sierra Club v. Watkins*, 808 F.Supp. 852, 875 (D.D.C. 1991).” and “Because the CCP/EIS relies on an earlier document for full analysis of the hunting plan, the range of alternatives considered in the CCP/EIS is constrained by the outcome of that previous analysis. In fact, the CCP/EIS does not provide any alternatives at all for the hunting program. All project alternatives in the CCP/EIS involve a continuation of the hunting program evaluated in the April 2007 EA. NEPA requires that an EIS contain assessment of a range of alternatives to the proposed action. It is not clear if the CCP/EIS intends to rely on the April 2007 EA for evaluation of alternatives to the hunting program. If so, then the analysis in that document should be reopened and public comment solicited as

part of the CCP/EIS process. In other words, the conclusions of the April 2007 EA should be re-evaluated as part of the CCP/EIS process and a range of alternatives for hunting should be incorporated into the alternatives presented for the CCP/EIS. These alternatives, from the April 2007 EA, include at a minimum, closure of the refuge to all hunting.”

Commenters felt the Alternatives presented did not include what the public wanted and thereby gave an incomplete range of comparisons: “I look at A, B and C as really giving us no choices. I was taught how to sell, and one of the things that we were taught was give your people three chances, all of which you want. And that’s what you’ve done here. You have given us three examples of what the Fish and Wildlife wants. No examples of what the people in the area want. So, that’s my one comment about the process.” and “One thing I don’t like about the plan is you are giving only A, B and C. But it’s like going to a dealership and asking for air conditioning on the car and the only way you can get it is by buying the preferred option’s package. You have to have a sunroof, power windows, maybe an upgraded sound system. There are many lists, many of the items listed in Alternative B in the back of the book, can be accomplished with the existing amount of land. I don’t think that you need 49,718 more acres to accomplish about 90% of your goals with the exception of making it get a little big larger.”

Along parallel thinking, a respondent stated that other options suggested by the public should be allowed and there should be a study to evaluate the effects of people studying the wildlife: “The other is I think we are allowed to recommend things that aren’t in the options, in other words, that they be included in the options, and I am not trying to be cute about this but one thing I would like to see and one option...I favor Schedule A, I’ll get that right out...I mean Option A...is if there was an option that actually reduced the amount of monitoring, assessment, tagging, tracking, etc. of local habitat including the loon and osprey populations because there is a lot of talk about doing assessments of what public uses impact is on say the osprey and loon population but it does not...I think it deserves a study to see what the effect of all of the studying has done to the loon and osprey population (applause).....”

New Alternatives Proposed by Commenter [3.8]

A commenter suggested moving the Refuge staff to other locations, leaving the Refuge unmanaged and seeing how it fared: “I am presenting a proposed Alternative D, and it doesn’t stand for Dan, it just happens to be the next letter available. Leave the refuge at its present size with the option of buying lands within the original scope of the refuge. Relocate all refuge personnel to any of the other 545 refuge locations, and let Mother Nature have an opportunity to take care of her own. The Service has done many studies of the present status of the refuge. I propose coming back in 14 years and study the changes that will have occurred in that time, letting Mother Nature doing whatever it does. Then compare the results with the 545 other refuge locations where the Federal government knows better than Mother Nature; then you can create a baseline as to who has done a better job. My money is on Mother Nature.”

Another person wrote that the Refuge should expand to its full original boundaries: “There should be a fourth alternative offered that includes expansion to the full original boundaries (Approx 6,000 acres) and MOU’s entered into by the USFWS and abutting land owners for upland, forest, and habitat management on a willing landowner basis.”

Finally the suggestion was made to manage for mature forests stating: “We would suggest that one priority for land management and research should include managing for mature forest conditions in some areas. While not a specific focus of Alternative B, we support an approach where natural processes allow the development of older forest age classes in a portion of the landscape. For example, where Ecological Land Units, site capability, and Potential Natural Vegetation models suggest managing for representative forest types, we suggest at least 25% of that acreage be managed for ‘old growth’ or mature forest ecosystem conditions. Allowing for the forest’s biological ‘legacies’ to develop over appropriate time would result in an increase of (1) large coarse woody debris and its associated micro-habitats; (2) organic soil layers and carbon reserves, and (3) the forest’s resilience to both local and global scale threats. With a portion of the Refuge managed for natural processes, you would be able to more effectively evaluate the outcomes of active habitat management through comparisons to unmanaged ‘control’ or reference sites. In addition, conditions representative of mature forests would help to achieve goals for many focal species, while also supporting a full suite of ecological processes and non-game wildlife species.”

Affected Environment and Environmental Consequences

Refuge Physical, Biological, and Socio-Economic Resources [4.0]

Some comments addressed Lake Umbagog’s physical, biological, and socio-economic resources in terms not specific enough to be categorized elsewhere. Some of these comments regarded to the expansion of the refuge, both for and against, and other letters commented on habitat and species management.

Comments also addressed the importance of conservation, and some added an emphasis regarding the high amount of development in the Northeast. One comment sums up many: “It is a pristine, quite area that needs further protection. The Northeast is a very crowded part of our country, and areas like the Umbagog should be protected in its wild state, not only for the habitat it affords the wildlife, but also for the respite it provides the millions of people who are within a day's drive of the area.” Some added to this line of thinking by strongly advocating quiet, non-motorized recreational opportunities over motorized uses. One commenter echoes others by writing, “I want to be able to enjoy places that are quiet, serene, beautiful, and not filled with motorized vehicles of any type.” A few added that conservation is important in terms of mitigating global warming. There was often a belief expressed among the expansion advocates that “the economic incentives this type of tourism can bring offer a wonderful reason to support the land acquisition.”

However, there were parties in opposition to the Wildlife Refuge’s proposal to expand conservation efforts. One party states: “Have the staff focus on doing a number one job in managing the lands they already have, as there are questions about how well they have been doing managing the lands they have already acquired. If they can become stellar examples of wildlife and habitat management, while imparting their knowledge to the local children and

interested adults we have a win-win situation.” Of those who did not support the expansion of the refuge, they expressed concern of the socio-economic well-being of local residents. One person expresses a concern voiced by a few others, “the community needs lead time to plan on how they would be able to survive and make a living if most of their wood related jobs disappear.” Some letters stated opposition because they felt “the Wildlife Refuge should think about us human beings affected by their choices,” and they felt the decisions regarding access and recreation did not consider the true public uses of Lake Umbagog NWR.

Another topic of discussion was priority habitats and associated focal species. One person voiced that they “support focal species habitat management,” while others went into greater depth. One letter stated: “... strongly supports the management recommendations included in Alternative B that strategically focus and emphasize the conservation of a mixed forest matrix landscape and its component habitat types while enhancing and improving priority public use opportunities. ... supports Alternative B's management activities that are designed to emphasize the conservation of a mixed forest matrix landscape and its component habitat types through the identification of ‘focal species’ for each habitat type objective. This strategic approach of focusing on particular species to guide management activities of important habitat types will not only enhance the ecological impact of the Refuge but it will also provide high quality education and wildlife-dependent activities such as hunting, fishing, wildlife observation, photography, and other priority public uses.” Another letter stated support to “promote and sustain high-quality habitat for refuge focal species” such as Blackburnian warbler, black-throated green warblers, and American woodcock. They continued, “... strongly supports wildlife habitat management extension for the benefit of private land management and the wildlife habitat provided by landowners.”

The same letter also expressed some reservations about the FWS’s implementation of this strategy: “In later discussions on the focal species, it was noted that many required unfragmented forests, or were interior species. For instance, Askins and Philbrick (1987) found that they (Blackburnian Warblers) disappeared from a 250-acre forest tract that became isolated from other forested habitat. Black-throated green warbler densities also decline in heavily thinned forest (Morse 1993). Forest management strategies listed in the CCP include forest harvest on Low Sensitive lands, selective cutting to increase softwoods and thinning to maintain earlier successional habitat for woodcock. These strategies may all converge with too little buffer, resulting in less than planned densities of breeding bird pairs.” They continue: “Another question that surfaced was in the establishment of the management Priority Habitats, and in particular in Table N-5 Refuge Management Priority Habitats and Associated Focal Species (Appendix pN-18). A great deal of discussion was presented in the main portion of the report on the N. White Cedar Swamp (2-46ff) and the Floating Island National Natural Landmark. It seemed unusual that these two rare plant communities would be given a lower priority than the entire mixed woods habitat. It was unclear from the document what the implications of this designation were. It appeared the three bird species – Blackburnian Warbler, Canada Warbler and Black-throated Green Warbler were all to have more resources address their survival than these vegetative communities. Does this imply that all efforts will be made to reach the targeted densities of breeding pairs of these species at costs that may directly or indirectly impact the wetlands? The other species, rated the highest in this table was the American Black Duck, which is hunted on the Refuge. This gave a confusing picture of refuge Focal Species as presented earlier in the report. It gave the appearance that more emphasis was placed on avian species.”

Some other letters in this category tended to express support for conservation of natural ecosystems in personal or general terms. Others had more detailed suggestions or observations. One letter detailed the economic value of natural services, detailing that “the natural world provides the foundation for human health and economic vitality. Natural systems store floodwater, clean drinking water, help retain soil, provide productive soils for agriculture and forestry, support wildlife, and... The value of these services in the I-93 corridor alone is upwards of \$200 million.” Another letter expressed support for the control of invasive species with the “judicial use of herbicides to control invasives given the long-term impact they have on natural ecosystem function,” and they supported continued cooperation with the state in the effort. In a differing point of view, one commenter thought “the natural forces that prevail in a region are generally capable of sustaining the native flora and fauna without human intervention, which disposes me to support natural ecological process management.” They supported designating “certain zones for natural process conditions and certain other zones for focal species management.”

Related to fire, a letter offered support: “As the state agency responsible for wildland fire, we offer our full cooperation addressing fire issues on the Refuge as we have done successfully with other federal ownerships in the state.”

Refuge Administration [5.0]

Respondents commented on the current and proposed administration of Lake Umbagog National Wildlife Refuge. Many believe that the FWS has done a commendable job, while others question the capacity of the FWS to “manage” the current Refuge.

Some believe the proposed changes do not coincide with the mission of the FWS, while others “wanted restriction on development, but . . . what we’re getting are restrictions on historic uses that are starting to pinch.”

One respondent ties the lack of capacity to Congressional funding: “To date, annual funding for the Refuge has not been adequate for the proper upkeep and care of the land it now owns. For example, the old Potter Farm, a historical landmark, is an embarrassment, and many roads owned by the refuge are badly in need of maintenance. What makes the Department of the Interior think they will better manage 50,000 or 75,000 acres when, to date, it hasn't been able to successfully manage half or even a third of that amount? This is not an indictment of the Refuge Manager or those who work under him. Quite the contrary -- they have done an admirable job with what they have been given. Congress and the Department of the Interior just haven't given them nearly enough.” Another respondent is discouraged by the “emphasis by the FWS on accumulation of land, property and staff at a time when the parent organization is emphasizing holding down head count, outsourcing operations and activities, and reducing the budget for land acquisition.”

One respondent questions, “What has the current refuge done to maintain or assist the public in its use? I would like to see the list. Please add all the construction on refuge on property (fences, pavement, foundations, and parking lots).”

Wording in Chapter 3 of the Draft CCP/EIS “Refuge and its Resources, Establishment” prompted the following comment: “There is some clarification needed between the first and last paragraphs in this section. The first paragraph characterizes the partnership effort to

create the Refuge centered on preserving existing land uses, including wildlife habitat, timber management, and traditional public uses in the vicinity of the lake. This is the effort that the State fully supported and was actively involved in to this day. The last paragraph states that the Refuge was created by Congress for the purposes of conserving the unique diversity of wetlands habitats and associated wildlife and protecting water quality in the area. Which takes precedence and to what extent can preserving existing land uses be incorporated as a supportable objective within a Refuge boundary? Does this doom the long term use of conservation easements within the Refuge boundary?"

The proposed name change of the Refuge is viewed as an unnecessary expense by one respondent. Others are concerned with the implications; "I would agree with your suggestion to change the name of the Refuge considering the scope of the proposed efforts which include addressing terrestrial systems. Umbagog Wildlife Refuge better reflects the watershed-wide delineation of the proposed boundaries." In contrast, another respondent states, ". . . I am specifically opposed to the inclusion of the Lake area within the parameters of the refuge. In other words, I don't like the name change; it has the potential in my judgment to change a lot of things in terms of control of the lake. I think it possibly usurps, unless they give up their sovereign rights, the state's rights under it."

One respondent is concerned with leased land; "I am told that the original owners of the lands under lease to individuals for camps around Lake Umbagog understood that the leases would be honored going forward. Now, those leases expire 50 years from the inception of the Refuge . . . Since most of the dollars returned to the area in the form of payments in lieu of taxes come from those leases, it seems shortsighted as well as unfair to those who have invested their time and resources to improve these sites, to take them away. Especially given the poor performance to date at managing the camps and homes (and farm) already purchased and allowed to deteriorate."

Land Acquisition [5.1]

Respondents commented on the proposed land acquisition. The majority of those in support of expansion are concerned with protecting natural resources and land from development. Land acquisition, for some, is critical for protecting water resources, habitat for wildlife, and recreation opportunities. Those opposed to expanding the refuge are primarily concerned with budget cuts, capacity, restrictions to access, and property tax increases. Respondents from both sides emphasize that potential sellers should be willing and not feel pressured by the FWS.

Those opposing proposals to expand the refuge generally support Alternative A. Restriction of access is the most common reason cited for opposition to expansion. The following statement represents this sentiment: "We are not in favor of Plan's 2 and 3. We do not approve of restricting more development of any kind along the shore front of the lake. However, we feel that enough is enough concerning rules and regulations, and more land acquisition. We like the way it is after enjoying hunting, fishing, riding snow machines and ATV's, and berry picking for the last 40 plus years at our camp. . . . Needless to say this has been going on for generations without harming the wildlife or the environment in this area. Once again we say 'Leave it as is.'"

One respondent stated, “My family has owned a camp on Lake Umbagog for several years. The camp is located on leased land. . . I feel the need to point out that there is another aspect to the Lake Umbagog area: The families that have inhabited camps on Lake Umbagog for generations. Those families play an important part in the history of our area. . . . If your proposal plan is instituted, and Alternative B takes effect, we and other families like ours will be negatively affected, in more ways than one.”

Respondents are concerned with funding and the capacity of the FWS to maintain acquired lands and buildings. A local property owner states, “I think enough government money has been spent and it doesn't seem as essential as other needed uses. Some of the purchased properties seem to have a more negative feeling from what I can see as a passerby in the area. We would not be interested willing sellers as I feel we can take care of the property better than I've seen other pieces taken care of by the Government.”

Frustration with current Refuge management was also mentioned by some as a reason for opposing expansion. One responded states, “I must admit that I am conflicted about the proposed expansion of the Lake Umbagog National Wildlife Refuge. In theory, preserving the land from being subdivided and developed is great and I am all for that. In practice, what the government agencies then do or don't do with that acquired land makes me angry. What I have seen over the last ten years or so and some of what is proposed, are projects that area a waste of money and not of particular value to wildlife or to enhance the natural experience for people.”

Those in support of expanding the refuge generally prefer Alternatives B or C. “My main reason for support of Alternative C is expansion of the refuge by 76,304 acres. As I stated at the public meeting in Berlin, NH, they are not making any more land,” says one respondent.

Conservation was mentioned by most expansion supporters. One respondent feels, “The Refuge should be expanded to ensure that this entire ecosystem remains wild for generations to come. In my opinion it appears that only Alternative C seems to recognize the Refuge's role in the greater New Hampshire - Maine landscape and seeks to restore ecological processes to the Refuge.” Another person states that expansion, “would enable the Umbagog preserve to be fully integrated with other protected lands in the area, such as the Errol Town forest, the Mahoosucs and Lake Richardson, the Pingree easement lands and Dartmouth's Second College Grant.”

Protection for wide-ranging wildlife was also discussed by many; “Adding lands and waters to LUNWR would protect high-quality air, water and wildlife habitat in our region. These places would enhance protection of uncommon wetland and riverine habitats. They would provide additional habitat for resident wildlife populations that can persist within the refuge, such as snowshoe hare, brook trout and ruffed grouse. Conservation of abutting lands and waters that link LUNWR with other conserved parcels is even more important for wide-ranging wildlife populations that cannot persist on LUNWR alone, such as black bear and moose. These links can also protect recreational passage that may well be foreclosed by future land subdivision. Refuge expansion will benefit migratory wildlife such as loons, waterfowl, birds of prey and songbirds.”

One supporter of Alternative B states, “Acquisition and management of an additional 906 acres of Scrub-Shrub within the proposal to conserve/acquire 28,575 acres (fee) and 17,080 acres (easement) of upland forest habitat for American woodcock and other focal bird species

of conservation concern. Additionally the preservation of access for varied public uses is of considerable value. Large track ownership in this region has shifted from industrial forest landowner to the short-term investor owner. Continued public access to these lands is becoming less certain with time.”

Protecting the area for future generations to enjoy is important to many commenters. A property owner with easements on their land claims, “I want the land and lake protected as much as possible for my grandchildren and future generations.”

One respondent only support acquisition of “wetlands directly associated with the current Refuge system.”

Commenters believe that land acquisition will allow for more public access than private ownership in the future, and therefore support the proposed expansion. A public meeting participant stated, “. . . it’s private land, and they can do what they want, but when you have the ideas . . . you have the ability for the refuge to acquire additional lands, we know that we’ll always have these types of processes where we can say, we can go to the headquarters and say, ‘Paul, what are you thinking about this - what’s the plan.’ Where we have a whole public process here, where we can say this is what I like, this is what I don’t like. That’s not necessarily the case for other private lands; these decisions are made in places - decisions about land management and land use, development, timber harvesting, all that stuff, those decisions are made far away from Umbagog National Wildlife Refuge. And for the lands that are particularly important for the people who enjoy this area, for all the different reasons, in prioritizing those lands around this really special place, and having the refuge the ability to acquire some of these places for public use - for continued public access, for everything that we all agree is important . . .”

One supporter states, “The Fish and Wildlife Service should do all it can to protect as much of the surrounding landscape as possible. This is important for the water resources, wildlife resources, recreation resources, air resources and the future of our state and region. When I think of all the taxes I pay, my hope is that a significant portion of them go to permanently protecting this most precious resource, now while we still can. As to the alternatives presented, I am in favor of protecting as much land as possible in fee or conservation easement. The management options can change through the coming decades as our needs evolve. We must protect the land now.”

A few commenters support land acquisition but do not support “the use of wildlife dollars to purchase land for motorized use.” Several respondents would like to see non-motorized recreation opportunities increased with land acquisition. One of these respondents specifically requested more backcountry camping opportunities.

Several respondents prefer land acquisition through easements, rather than purchase through fees. Cost is cited by one; “Easements are less expensive than land acquisition and would be more acceptable to a wider range of Refuge supporters. Funding would be more readily available and cover more area per dollar invested, putting more area under protection in a shorter period of time. . . Some landowners would be willing to donate all or a portion of the easement value for a future tax advantage.” Several commenters see easements as a way to “enhance the management of the Refuge while still allowing traditional uses including sustainable forestry and recreational access.” Concern over the quality of the land acquired is the reason some respondents prefer easement over fee acquisition. One person states,

“Neighboring land owners would be less likely to conduct "liquidation or diameter limit" harvesting prior to selling the land. This would preserve better wildlife habitat and timber supply for the long term.”

One commenter adds, “We feel the relative mix of fee ownership to conservation easements should remain somewhat flexible to respond to specific landowner needs and on-the-ground conditions. This could be achieved by identifying targeted ranges for fee and easement acquisition rather than specific percentage of each.”

An alternative to FWS land acquisition was suggested by one respondent; “Supporting acquisitions by other state and local entities should be given much more weight and would be the best indication of a true commitment to partnerships.”

The market value of land listed on Page A-21 of the Draft CCP/EIS was questioned by one commenter who asks, “I don’t know where you got that figure. We just had an appraisal on our property on Lake Umbagog and this is so out of line, it is unbelievable. . So that’s what I want to find out. Where that amount of money, that estimate, came from?”

Buildings and Facilities [5.2]

Comments pertaining to buildings and facilities are primarily focused on specific proposals. General comments include; “To minimize the production of greenhouse gases we urge you to employ the most energy-efficient technology and management practices in the purchase and use of vehicles and in the conversion, construction and operation of refuge buildings.” and “The reclaiming of the land after purchasing the buildings is really...has not been environmentally correct. Most of the places that I’ve seen and I just took a walk today and took pictures of the land that was reclaimed with stones...not stones...wood, metal...um...nails, equipment, plastics all sticking up out of the ground.” One respondent feels that the current signage at Tyler Cove detracts from the beauty of the area.

Several respondents support the proposal to relocate the Lake Umbagog NWR headquarters and build a visitor center at Potter’s Farm. The opportunity for public education was mentioned by many commenters, one of which states, “The preservation of the farm will assist in future generations understanding the history and reason for the refuge and the history of the region as it has and will continue to change. More interpretive space, public programming and the ability for the public to have a clear ‘go to place’ must be part of your plan. The Potter farm is the best site for this on the entire Lake for your focal point of educating the public and also allowing for appropriate office space etc. It is clearly worth the expenditure of public funds to preserve this farm. This farm should stand out as an example within the refuge system nationally as a model of appropriate public engagement.”

Those who oppose the Potter Farm proposal cite multiple reasons, most of which are related to the cost. One respondent feels that the money would be better spent on land acquisition, while another believes it is “not fiscally sound.”

Respondents “believe the restoration of the Potter Farm site to natural conditions is more appropriate to the Service’s mission than developing a new visitor center” and “The paving of the river access parking lot and road for non-trailer boats rather than leaving it gravel seems like over building to me.” Several respondents do not like the proposed location, which is viewed as less accessible to the public. “Keep the staff where they are; visible and

accessible to and by the community,” states one resident. Others are concerned with the condition of the road accessing the site.

A local landowner with natural resource and location concerns states, “The intrusions would be massive. The noise of visitor and bus traffic on the road, in the proposed parking lots and around the old house would be intrusive to birds, animals and neighbors. Docks for public access within tens of feet from our dock would put an end to the quiet we cherish. Motor boat and jet ski traffic, already increasing on the lake, will skyrocket from new and accessible docks. This increased traffic will disturb the loon, water fowl and lake otters we see swim past our dock each year. This development will irreparably destroy the wildlife environment we have enjoyed and protected for the past 40 years. . . . believed this would ensure that the shore of Lake Umbagog as we knew it would not change for birds, animals, our family and our neighbors. This proposal flies in the face of the spirit of that sale.”

Most respondents do not support the Sturtevant Pond boat launch because of the potential negative impacts to wildlife and local residents. Several people requested that it be “left alone”.

One respondent states, “We would like to go on record as opposing the boat launch on Sturtevant Pond as proposed in plans B and C. A boat launch at the Northeast end of this small pond (approximately 519 acres) near or at the only marsh area on the pond would be very disruptive to the wildlife that presently exists there. Loons, Blue Heron, and Mergansers have nested in this same marsh area for years. This small quiet pond is approximately 15% developed at the southern end only. This leaves the rest of the pond undeveloped and provides the wildlife a quiet habitat. . . .This goes completely against the stated goals of the Refuge system of preserving and enhancing the wildlife and their habitat. . . . High powered bass and other boats and personal watercraft would be devastating to this small pond's wildlife.”

Another responded further discusses habitat concerns; “Being a biologist I think of the impact that the boat launch would have on the ecosystem of the lake. The delicate organisms that have a symbiotic relationship in the pond being disrupted by petroleum and waste pollution, as well as the noise pollution driving away the diverse abundance of wildlife in and around the pond. This affect has already been felt with the selective cutting of timber and the road being built to access the area.”

The location of the proposed ramp is of concern to one respondent who writes, “Sturtevant Pond is a small pond of approximately 500-600 acres. One area of the pond has a depth of about 50 feet while most of the ponds area is relatively shallow.... The location of the proposed boat ramp is of particular concern. Map A-5, Proposed Public Use, on page A-28 of the Draft Appendixes shows the ramp being located in or near the natural loon nesting area of the pond. Increased boating activity in this area will most likely eliminate natural loon propagation from this pond.”

Respondents voiced concern with the B Pond boat ramp proposal. “We don’t need a boat ramp. . . We don’t need to drive in and have people backing down with boats . . . We want to protect the lake, states one concerned member of the public. Another person cautions, “Putting a boat ramp on B Pond will be a big wrong. As soon as you do that, some fool will bring bass there in their boat's live well and destroy a great salmonide fishery. They have done in many ponds around here and B Pond would suffer the same problem. Instead, as a

matter of caution put a control dam on the outlet brook to make sure that the pond doesn't get ruined.”

“There is no need for boat ramps of any style at B-Pond and C-Pond in Maine. These are remote ponds with limited access and any attempt to improve access would be detrimental to the resource and spoil the natural beauty of an adventure to these areas,” adds one respondent.

The proposal to close the Brown Owl boat launch was not supported by many local residents who frequently use it. Use by visitors and the lack of alternatives in the area were also discussed as reasons to oppose the proposal. One commenter requests that funds be used to restore Brown Owl instead of building a new ramp at B Pond.

A few respondents request more launching sites for kayaks and canoes. One person is critical of advertising canoeing and kayaking in the refuge because “rest stops with toilets are few and far between.”

One responded would like a wildlife viewing platform built on Eames Road, “at the west end of Sweat meadows where the road crosses the inlet.” Another responded “supports the establishment of additional parking areas off the current road network to facilitate hunting in the expansion area as lands are acquired.”

The old dump site was mentioned by one commenter; “Also you call the old dump refuge land. Has anyone ever mentioned that the dump lands have old remains such as bottles, old vehicles, garbage which I'm sure is now in the soil. What has the refuge done to ensure the environment at the dump? It's definitely polluted landfill.”

Staffing and Funding [5.3]

There is a general concern from many respondents that the current budget cuts have and will continue to negatively impact the FWS staff's ability to manage Lake Umbagog NWR. One respondent states, “I applaud the efforts of current Refuge manager Paul Casey and his staff for their diligence and never-ending hard work, it is clear that federal appropriations resulting in limited staffing and funding for the current Refuge are woefully inadequate.” Another adds, “Adopting Plan A at a higher level of funding will serve wildlife, the Refuge and the general public better than an expanded, under funded Plan B or C.”

One responded suggests revising the operation needs budget; “Operations: According to the plan, ‘the goal is to have a maximum of 75% of a refuge station's budget cover salaries and fixed costs, while the remaining 25% or more will be operations dollars’. (p. 2-12) Currently, 87% of the budget is salaries, according to Paul Casey. That would leave 13% for operations, which I assume includes purchasing and maintaining the fleet of vehicles, boats and equipment catalogued earlier, as well as the infrastructure requirements of the buildings and grounds. . . I would recommend that the Service revisit the proposed Refuge operations needs budget in Appendix F with an eye toward reducing the acquisition and maintenance budget going forward. Outsourcing some activities (also recommended in the USFWS 2008 budget) to the local or regional vendors rather than out-of-region contractors would seem more appropriate than the current requisition model.”

The lack of signs has been attributed to inadequate funding by one commenter.

Road System [5.4]

Comments on the road system generally pertain to access and maintenance. These concerns are demonstrated by the following comment; “The promise is to maintain those gravel roads that ‘they see fit’ to allow access to the backcountry. But all it takes is a budget cut and they say they can not maintain those roads they don’t want the public to use in the future.”

One commenter writes, “Since one part of the CCP calls for removal of the ‘Interior Forest Roads and removal of culverts and bridges to return the roads to natural conditions’ and the Fire Protection Plan call for restoring roads and increasing carrying capacity on bridges to fire truck and safety vehicle load carrying capacity it is clear that no plan exists for either. A clear map of all existing roads and the planned removals or up-keep is necessary to determine future recreation potential under the expansion alternatives.”

One commenter is concerned with trespassing and states, “The plan is for Mountain Pond Road and Eames Road to be converted to a walking trail. It already is. People are more than welcome to walk the roads. They are not welcome to trespass on our property and steal from us. By imposing your plan, you are encouraging them to do so, albeit indirectly.”

Trails were mentioned in the following comment: “Goal 4, Objective 4.3 (p.2-7): We recognize the need for additional trails on the Refuge and support the development of trails in the Potter Farm and Thurston Cove areas. We have reservations about developing trails in the Mountain Pond area unless they are proposed to follow existing forestry roads. This area includes extensive areas of sensitive habitat and breeding habitat for several species of concern, and has experienced little human disturbance in the past.”

Enforcement [5.5]

For some commenters enforcement is too prevalent on the Refuge, and for others it is lacking. Commenters believe that the “nine levels of law enforcement in the area” is adequate. One commenter further states, “Additional Refuge enforcement is costly and unnecessary.”

One local resident is concerned with illegal activity and the ability of the FWS to enforce the proposed changes: “If Mountain Pond Road and Eames Road are converted to a walking trail, who will deal with the litter and trash? Placing trash bins along the road does not make for a scenic walk and will attract scavengers. Who will deal with the scavengers attracted by the trash? If campsites N2 and N3 are disposed of, who will deal with the overflow of campers who feel that they have the right to make their own campsite anywhere they want to? This summer, my colleagues put out a fire near the Rapid River on Lake Umbagog. It was caused by people camping illegally who did not completely extinguish their campfire.” This respondent further asks if there is an emergency plan in place for fires.

Volunteer and “Friends” Group [5.6]

Using volunteers to improve and maintain trails was suggested by one commenter. Another commenter suggested, “Developing a Friends of Umbagog Wildlife Refuge Group which works in cooperation with the refuge system to develop and enhance the activities available within the refuge, as well as to improve educational and collaborative opportunities. . . Perhaps this could replace or be an extension of the proposed Umbagog Working Group.”

Creating a “creative volunteer wildlife observer program” to work with hunters and non-hunters was also suggested.

Visitor Services [5.7]

The following comment expresses a common sentiment on visitor services, “We would all like to see a user friendly Wildlife Refuge. The Umbagog Refuge and all land surrounding it should be a place where the public is made to feel welcomed with friendly, helpful, and knowledgeable staff.”

Commenters feel that visitor services are lacking at the Refuge. One commenter states, “Visitors are not briefed on the area. They are handed pamphlets and flyers that give a summary of the area and the species found here. You can call the refuge on any given day. When you do, you get an automated listing of all employees. You do not get a receptionist or secretary to answer information requests. . . The refuge is poorly advertised and its resources are not being used to their greatest extent, because of poor planning. . . Visitors to our area are not aware of the services that the refuge offers.” Another respondent adds, “The refuge needs to adjust its budget to provide more services for users: education, comfort stations, picnic areas.”

Comments include requests for toilets at boat launches, campgrounds, and for boaters. “One thing that I believe needs to be addressed is toilets at the designated camp sites. No matter how hard to maintain and unpopular I think the only possible solution is composting toilets. In Alt. C it mentions campers being required to bring portable toilets. It is just not going to happen.”

Also included in comments received are requests for “a hiking trail accessible from the lake,” “a new campground,” “interpretive trails and signage,” “wildlife viewing areas,” and the removal of duck blinds.

Social and Economic Values [6.0]

Respondents expressed both favorable and unfavorable comments related to the social and economic values presented in the Draft CCP and EIS. Many of these comments tier to land acquisition. Favorable comments include the value of protecting land for wildlife and open-space and opportunities for “non-traditional” revenue sources. Others expressed concerns that included the loss of working forestland, reduced access with more restrictions, or the loss of local revenue and property taxes.

Some respondents expressed concern with the overall economic analysis presented in the Draft CCP and EIS. Comments received reflect confusion over the analysis process used, the figures presented, the actual impacts to local communities (Errol, Upton, and Magalloway Plantation), and the various programs available to local governments to receive payments in lieu of taxes.

Local Economy [6.2]

Some respondents commented, “local residents fear the economic impact of the plan's details”, there is the feeling the “economic analysis was done in such a vacuum that the local populace was caught unawares”. Local residents wonder “Who is going to house, feed, and

clean up after so many visitors if the Service continues to purchase camps and homes, and where are these visitors going to go when the Service closes roads, closes campsites, closes boat ramps, etc?”

Other respondents fear the loss of jobs for local residents wondering if the new jobs would provide equivalent income to the jobs that would be lost.

One respondent cites National Wildlife Refuge Visitation records which “reveals that 68% of revenue from National Wildlife Refuges is from non-consumptive users” and requests the FWS “realize the revenue potential of non-consumptive wildlife patrons and reform their revenue base around this rapidly increasing segment of the population.”

Respondents expressed the desire to protect individual parcels of working forestland for the “continued existence and traditional uses of large forest areas which have characterized the northern forests for decades”, as described in the Governors Task Force. One commenter provided updated annual contribution figures for forest-based manufacturing and forest-related tourism and recreation to the New Hampshire economy and expressed that the economic impact analysis for recreation and tourism be conducted similar to the analysis used for forest-based manufacturing.

Conversely, respondents felt the refuge would have a positive economic impact through increased tourist spending and open space; “the refuge will help support a diverse and healthy local economy”. One respondent added that the “sale of real estate is another economic driver connected to tourism.”

Tourism [6.2a]

Most comments on tourism reflect the importance of tourism in the area. There is confusion as to current and future recreation use and need assessment, including facility development and its relationship to the proposed land acquisition. One respondent wrote: “The Service says it needs to acquire more land due to increased recreational pressures, among other things. But the economic analysis clearly shows that Alternative A would generate the fewest visits, increased numbers of visits 55,150 per year, versus Alternative B coming in at a whopping 90,950. I cannot understand how the Refuge plans to accommodate that kind of increase without additional campsites, more boat launches and parking areas, and more rest areas (and I don't mean at the Potter Farm; many campers and day-trippers who put in on the rivers never get to that end of the lake).”

Some respondents would prefer little change in the current level of tourism while others feel tourism would be enhanced by new visitor facilities such as roadside parking and trails. One respondent wrote: “I do support your efforts to improve the Refuge's recreational based programs in proposal B as they are critical to the economic survival of this northern region”.

Property Taxes [6.2b]

There were several comments related to the topic of property taxes. A few respondents felt that tax revenues have been addressed fairly. One respondent pointed out, “we have found properties which abut wildlife preserves are more expensive because people appreciate the space and the quiet”. Another respondent states, “as explained in the draft CCP, there exist today Service programs to make some payments in lieu of taxes. The land to be protected with Service purchased conservation easements will remain on the tax rolls.”

Some respondents expressed concern over the loss of a tax base with the proposed land acquisition, “this will affect us camp owners, because with the Wildlife Refuge buying all these camps means less taxes being payed, and that probably means our taxes going up & up & up until we cannot afford it and have to sell.” Others were concerned with inflated property values. In general there is agreement amongst this group of respondents that proposed Refuge actions “cause taxpayers to pay a dis-proportionally high share of the Refuge’s cost due to higher local property taxes needed to make up for the shortfall in revenue sharing”.

There is confusion over the exact property tax impact of the different alternatives. One respondent wrote: “My major concern with Alternative C was the impact it would have on township property taxes. Speakers at the hearing in Berlin stated that townships would face serious financial losses as a result of Alternatives B and C. After reviewing Table G-22 on page G-30 it appears they were misinformed. Apparently, the townships after receiving Full Refuge Revenue Sharing (RRS) payment, will actually benefit from Alternative C. if table G-22 is correct.”

A few respondents provided additional figures and analysis illustrating anticipated loss of tax revenues that would have been paid by private owners of lands acquired by the refuge and in-lieu of tax payments by the Refuge. One commenter wrote, “The issue of payment in lieu of taxes is always brought up as we are not losing tax revenues. The town of Errol received \$24,039 for the tax year 2006 for the 10,510 acres of land that they owned. This is \$2.28 per acre which might be fair for the wetlands but is far from what the town would have collected for waterfront homes or waterfront lots that the refuge has purchased. So far from being a financial asset to the community of Errol, it cost us money to have the refuge for a neighbor.”

Further concerns with revenue sharing programs were expressed. Uncertainties with the level of payment from year to year and FWS re-evaluation of property five years after it is purchased were specifically mentioned. One commenter stated, “Currently all towns are, if you will, at the mercy of the person or persons who determine whether the level or revenue sharing will be 41%, 50%, 20% or whatever. Furthermore, there appears to be no assurance that this percentage will not drop to very low levels causing even greater shortfalls to be passed on to local taxpayers.” Related to the re-evaluation of property in future years, one respondent requested additional information in the Draft CCP and EIS disclosing to communities “information about the Service’s policy or past history regarding these reevaluations”.

Some respondents provided suggestions to increase lost tax money back to the local communities. For example, one respondent suggested that “the Service sell back into private hands the camps and homes it has purchased to date and fund acquisitions of uninhabited land within the current boundaries of the refuge with the proceeds.” An additional comment includes a recommendation that the “Service extend the leases on the lake to 99 years giving the lessees the opportunity to sell or bequeath their properties and exacting an acquisition fee from anyone purchasing a lease, splitting the proceeds from those acquisitions with the towns providing services such as fire protection, ambulance service, etc.” Some respondents recommend further sharing of services and resources with the community to balance the removal of taxable property as the refuge expands.

Social Values [6.3]

Respondents commented on the significant bond between the land and local communities. They want to ensure the Refuge maintains a connection to their communities, “there is a strong concern by them [local residents] of many aspects of the Refuge policy and how it will affect the population of the region in future years”. Some speak to the “long history of use that affects the very social fabric of the area towns,” while others see the Lake Umbagog National Wildlife Refuge as an area, “where we have an opportunity to arrest the rapid encroachment of humans on every piece of available land.” One respondent highlighted the areas “important historical significance; Author Louis Dickinson Rich (We Took to the Woods) lived in this area.”

One commenter wrote, “the solution to better stewardship lies in education and the administration and enforcement of our current laws. Your actions may seem noble and honorable, but what ultimately occurs is you take the recreational land use away from the average person in this area of modest income and make it a playground for the more affluent.”

Air Quality [7.0]

There were very few specific comments relating to air quality. The comments directed at air quality addressed global warming. Some were very general comments like “Global climate change only makes the importance of conservation lands and waters that much greater.” A more specific comment stated: “Air Quality Affects of Alternative B: At the same time that these forests can be considered carbon sinks, they can also provide substitute products that either replace existing sources of carbon for energy by cycling carbon through woody biomass or tie up carbon in forest products. In addition, forest products often have less carbon emissions for a given use than more energy intensive products such as steel and concrete. The State of Maine has been doing work in this area if you need more information.” The other comments related to air quality stated an opposition to allowing motorboats, snowmobiles, or OHV’s due to their greenhouse gas emissions.

Open Water and Wetland Habitats and Species [10.0]

Comments within the Open Water and Wetland Habitat & Species category fell into five general areas; Wetland Habitat, Invasive Species, Loons, Brook Trout, Furbearer Management.

Wetland Habitats [10.3]

Concerning wetland habitat a commenter wrote: “America has lost and is losing too many wetlands, particularly on the east coast.”

A respondent wrote that inclusion of a songbird as a focal species for shrub-scrub wetland would be desirable stating: “While Canada Warblers use shrub scrub wetland extensively in the western United States, they use it infrequently, if at all, in the northeast. Including shrub-scrub wetland in estimates of habitat available to Canada Warblers on the Refuge will over-estimate available habitat for this species. Inclusion of a songbird as a focal species for

shrub-scrub wetland is desirable. Swamp Sparrow, Common Yellowthroat, or Alder Flycatcher would be appropriate candidates.”

It was stated that emergent marsh and aquatic bed wetlands should be recognized as high priority habitats: “We believe that emergent marsh and aquatic bed wetlands should be recognized as high priority habitats. These wetland habitat types are extremely important to fish and wildlife and are extremely sensitive to water levels. The extent of emergent marsh has decreased dramatically during the past 30 years, nearly to the point of disappearance in some areas of the refuge. Pied-billed Grebe and Marsh Wren would be good candidate focal species for emergent marsh. We expect that one or more fish species would be the most appropriate candidates for aquatic bed wetlands.”

Open Water [10.2]

Protection of headwaters was a concern voiced by one participant in public testimony stating, “... I do want to state, and nothing has been mentioned here, about aquatic organisms and I know there was some statement about the state’s managing the waters. But, we want to really be certain that the headwater streams that you are looking to acquire have adequate protections on them. And, that the fishery resources, especially the native brook trout in this region, have extreme national significance. The Magalloway, the Rapid, the Dead Diamond, the Cambridge, the Black Diamond...are all of just incredible national importance...”

Invasive Species [10.2a]

Several respondents wrote about invasive species. One area of concern was that “any increase of boat traffic increases the odds of introducing invasive water plants which would have a drastic impact on all aspects of pond life, including property values.” Education and inspections were suggested solutions to combat invasive species: “In addition, we recommend that any existing motorized boat access sites be staffed by courtesy boat inspectors to educate boaters on how to inspect and remove hitchhiking aquatic plants from boats and trailers.”

Also, concern was voiced over the possible introduction of smallmouth bass into Pond B, threatening native brook trout populations: “Putting a boat ramp on B Pond will be a big wrong. As soon as you do that, some fool will bring bass there in their boat’s live-well and destroy a great salmonid fishery. They have done in many ponds around here and B Pond would suffer the same problem. Instead as a matter of caution, put a control dam on the outlet brook to make sure that the pond doesn't get ruined.”

Another commenter voiced concerns about specific invasive species in public testimony stating, “...And, I know that the US Fish and Wildlife Service, being part of the Eastern Brook Trout Joint Venture, is aware of this. But, we want to reiterate that and make sure protections are put in place for the aquatic organisms and to take every precaution to prevent any more introduction of invasive, non native species, whether it be another fish or another organism such as didymo – which has already been found in Vermont and New York. We have a great deal of concern about that and if there’s any way we can prevent those items from getting into these waters; that would be really great.”

It was suggested that funding be set aside for signage on invasive species and that a notice be produced educating researchers themselves in avoiding the spread of invasive species: “...In the section on boating, it would be recommended that funds be allocated for signage on both

invasive species, and no wake zones. As well, it may be beneficial to have some notice in the research application on care in avoiding spread of invasive species through equipment or clothing, as well as spread of disease such as occurring in heretofore from bacteria on clothing (boots). It would be nice to think that researchers do no harm but they often have some of the most intense impacts.”

Fish and Wildlife Species [10.4]

Common Loon [10.4a]

Respondents had a variety of comments concerning loons such as; habitat, population, needed research, nesting pairs, and predation.

Concerning loon population, a respondent was pleased with Umbagog Refuge’s common loon population stating: “Moreover, I was pleasantly surprised to read that the Umbagog Refuge supports the largest common loon population in the state of New Hampshire (according to Maine ECO (Maine Environmental Citizens Online); in view of the fact that MPBN (Maine Public Broadcasting Network) www.mpbnet.net radio news and; NPR (National Public Radio) news, both media having recently reporting an alarming decline in loon populations in New England; if not in the nation.”

Conversely, it was claimed by another that loon populations on Lake Umbagog are declining: “The United States Fish and Wildlife Service incurred a considerable expense to create the Lake Umbagog National Wildlife Refuge, in part to protect the loon population on Lake Umbagog. Despite this large investment of public funds, the loon population on Lake Umbagog is faring poorly. In 2002, monitoring by LPC biologists revealed an unprecedented two-year decline of more than half of the loon pairs on Lake Umbagog.”

A respondent suggested that the Refuge’s goal of 18 nesting pairs of loons may not be realistic due to proximity of the interaction between loons, eagles and osprey and stated: “In view of the cited five-year averages of Common Loon nesting pairs, which do not exceed 20, the 31 pairs reported from 2000 seems likely to be an anomaly rather than evidence of a dramatic decline. We suggest that the target of 18 nesting pairs may not be realistic given the presence of three active eagle nests, and that total demand on the fishery resource from fish-eating vertebrates be considered in selecting a population target for the Common Loon. Strategies for this objective should include evaluation of interactions among Common Loons, Bald Eagles, and Ospreys, and spatial relationships among their nest sites and among their foraging areas.” A similar comment suggested utilizing territorial pairs as a better target goal: “The goal of 18 nesting loon pairs on Lake Umbagog in Alternative B is four pairs higher than the historical (1976-2007) number of nesting pairs on Lake Umbagog, and six pairs higher than the past five years (2003-2007). Increased management will likely be necessary to achieve this goal and ensure the success of these nesting pairs. LPC would also recommend that goals be expressed as territorial loon pairs, rather than, or in addition to, nesting pairs. The number of territorial pairs is a more accurate and representative metric to monitor the health and sustainability of loon populations.”

Another respondent suggested continued study to evaluate the decline in loon populations: “Accordingly special attention should be given to a better understanding of the reasons for the decline in the Common Loon population.”

Along a similar line of reasoning, a respondent claimed that an insufficient assessment of stressors has hindered loon recovery efforts and suggested the Refuge has scaled back its commitment to a cooperative study concerning the loon recovery efforts: "...Current assessment of real and potential stressors, and management to mitigate known and suspected stressors, has not been sufficient to prevent an unprecedented decline of adult loons on Lake Umbagog, or reproductive failure of the remaining population. ... It has been four years since the Refuge received considerable funds to investigate the decline of loons. To the best of my knowledge, none of the objectives of the proposed study have been adequately addressed, and we have made little measurable progress in establishing factors related to the decline of adult loons on Lake Umbagog."

The same commenter also outlined the specific study goals listed below:

- a. Survey for adults and chicks, capture, mark and take blood samples of Common Loons, Ospreys, Bald Eagles and other fish-eating birds. Use standard health checks for pathogens such as West Nile Virus (one loon in 2002 tested positive for West Nile Virus). Work with Texas A&M Trace Element Research Lab, University of Southern Maine, Tufts University, and the National Wildlife Health Center.
- b. Conduct early and late-season surveys on loons to determine mortality (shoreline searches), abnormal behaviors, and location of spring and fall flock areas on the lake.
- c. Identify and measure disease, parasites and biotoxins through blood, feather and egg samples of loons and other fish-eating birds using protocols developed by Tufts University.
- d. Conduct a bioenergetics investigation on the lipid content of a non-native species, the smallmouth bass, to determine if loons and other fish-eating birds are receiving inadequate energy requirements from the available prey base. Work with the USGS and Clemson University.
- e. Continue to evaluate genetic fragmentation in loons within the Lake Umbagog watershed. Initial results indicate that fragmentation increases down the watershed with Umbagog samples most corrupt. Work with University of Southern Maine and its Center for Integrated Assessment of Environmental Toxins.
- f. Expand satellite telemetry efforts to follow loons during migration and in the winter. Work with USGS-Biological Research Division, the USFWS, and FPL Energy Maine Hydro.
- g. Determine potential effects of introduction of non-native organisms (such as fungus – high concentrations of a certain fungal spore were found in the water in 2003). Work with Harvard University.
- h. Develop a matrix of decisions to identify impacts to wildlife with this data through an ecological risk approach. Work with New Hampshire Department of Environmental Services"

The same commenters also wanted to investigate contaminant stressors and listed the following:

- "a. Conduct a full organic pesticide and heavy metal scan of archived and new eggs of loons and other fish-eating birds. Analyze five archived loon eggs from the mid-

1970s, 1980s, 1990s, and 2001, 2002 and 2003. Work with the USGS National Wildlife Health Lab, USFWS, and Texas A&M.

b. Collect samples from sediment, water, plankton, crayfish, prey fish, gamefish, blood and eggs from several species of fish-eating birds, and mink and otter for contaminant analysis. Work with the USFWS and all state agencies.

c. Develop a system dynamics (SD) model to gain insight into the processes involved in the partitioning, speciation, and effects of contaminant stressors. System dynamics is a powerful tool capable of providing insight into dynamic mechanisms and feedback loops. The model would be based on published literature, field studies, and laboratory data. Data collected in all of the proposed investigations would be used in the formulation, calibration, and validation of this model. The SD approach can result in an understanding of complex phenomena and allows a comprehensive description of integrated, dynamic system relationships. A comprehensive model will provide insight into the fate of contaminants and other stressors, as well as insight into the effects of individual and combined stressors on the Lake Umbagog population declines, as well as the ecosystem-wide consequences.”

Concerning loon statistics, monitoring, and past and current studies a commenter wrote, “In addition to the water level operations and loon monitoring outlined in Article 27, the licensee has voluntarily conducted numerous additional studies. Loons on Umbagog have been captured and color banded to allow for better data information on return rates, productivity, nesting pairs, replacement of mates, and mortalities.. Blood, feather and egg samples have been collected to evaluate mercury levels in the loons at Umbagog and surrounding water bodies.. Several loons were fitted with implanted satellite transmitters to learn about their migration patterns and wintering grounds.All of this work has been funded and conducted by licensee biologists and their consultants.. ...These additional studies have provided the State and Federal wildlife agencies and interest groups with valuable data to assist them in managing for loons.....”

Several commenters wrote that loons and their habitat should be protected: “With global warming occurring world wide the loons in Alaska and other locations may find it difficult to survive. Protect the loons that live on the Lake Umbagog National Wildlife Refuge.” A commenter responded that the Refuge should limit human activity near loon habitat: “As diving birds that use sight to hunt their fish prey, they thrive in clear lakes with healthy fish populations. Also, loons only nest on undisturbed shorelines or islands with plenty of natural vegetation. Because loons nest at the waters’ edge, they are easily disturbed by excessive boat traffic and wakes, and are displaced by human residential activity. Further, loon chicks venture onto the lake soon after hatching, and can be injured or killed by careless boaters. Finally, like other animals that eat carnivorous fish, loons will accumulate health-threatening pollutants in their bodies if their habitat is contaminated. This can in turn reduce the birds’ survival and reproductive success.”

However, another commenter wrote that loons can take care of themselves and suggested eagles may be harming loon populations: “I also feel that the animals do take care of themselves & do not need your help. Your concern for the loons of the lake are less. Do you think the eagles have anything to do with this? I think they would gladly enjoy a baby loon for their lunch or dinner.”

Brook Trout [10.4b]

Several commenters were concerned with the diminished native brook trout population. One respondent, suggesting further study of the problem wrote: “The diminution of Native Brook Trout in Wild River where it merges with the lake should call for continued study.”

Another voiced similar concerns and urged continued partnerships to enhance protection efforts writing: “We feel the Refuge should play an extremely important role in the protection of the native Brook Trout fishery that exists in the region. As you are aware, the Rapid River Brook Trout population is in a precarious situation due to the introduction of illegally introduced smallmouth bass. Any watershed protections that would ease stresses on this nationally significant resource are welcomed by the Maine Council of Trout Unlimited. There are also several ponds in the area of the plan that are extremely high value Brook Trout ponds. B pond is arguably the best wild native Brook Trout pond in Maine. Due to the formation of the Eastern Brook Trout Joint Venture, a partnership between all State and Federal agencies and NGO’s that have an interest in the protection of brook trout throughout their historic range, we hope to see the Refuge expand it’s role in the protection of these fish.”

Furbearer Management [10.5]

Lake Umbagog National Wildlife Refuge’s proposed furbearer management program generated by far the most responses in this coding category. Respondent’s concerns included; general opposition or support comments, comments about trapping methods, comments concerning various types of traps, comments stating that traps are not discriminatory, alternatives to trapping, and comments concerning the Refuge should be a safe haven for wildlife.

General comments in favor of fur management include: “Please allow trapping,” and “We would like to express our support for opening the Lake Umbagog National Wildlife Refuge to legal fur trapping.”

Controlling overpopulation of wildlife through trapping was mentioned by a respondent, “...So I have to say something good about trapping. I remember the course, and it said that they did control overpopulation of animals, so I think that’s a good thing. I mean you can get mange and a lot of other things that happen when you have over-population; they eat all the food. Right now the deer are eating everything in sight. In Upton...its nothing to see 20 or 30 deer out on the lake, down at the end of the lake. So, I think that trapping, as long as it’s legal. ...”

One respondent felt there are negative consequences to prohibiting furbearer management by stating: “I am a hunter, fisherman and trapper. I feel that if trapping is not allowed on any piece of land, then that means you have to live with the consequences. If you have beaver problems, loon depredation due to an overabundance of mink then so be it. No trapping means no trapping by anyone. Massachusetts voted out the foothold trap and now has a coyote problem and severe beaver problems. They voted for this. Now they should learn to live with the consequences of their vote.”

Another person shared that the Refuge should be for managed for both people and wildlife and stated: “I urge you to make the Refuge a sanctuary for the public and wildlife alike, by allowing hunting, fishing, and trapping. Hunting, fishing, and trapping are consistent with

sound management of our nation's natural places. Please ensure that Lake Umbagog is managed in a manner that serves the needs of all.”

Commenters supported limited trapping and trapping for specific scientific reasons: “I do support allowing the following recreational activities and I feel that the wildlife can continue to thrive with these activities....5) Limited trapping, especially to control beaver, bear, and coyote populations.” Another commenter added: “. . . also supports the development of a science-based furbearer trapping management plan that would allow for the continuation of this traditional use while maintaining the management flexibility to reduce or otherwise modify trapping practices based on population fluctuations.” Another commenter stated, “. . .it is inappropriate for snowmobiling and trapping (unless trapping control of animals which are destroying endangered species is necessary) to occur on the Refuge.”

Several commenters felt that furbearer management would have a positive effect on waterfowl and breeding birds: “The . . . fully supports the development of a furbearer management plan and believes strongly that active trapping could have a very positive effect on migrating and breeding birds and waterfowl. By annually harvesting furbearing and predatory species such as coyote and other ‘nest robbing’ animals such as raccoon, breeding bird populations would gain refuge from some of their most destructive natural enemies. As a cornerstone in the North American Model of Wildlife Management, trapping is an important part of any healthy ecosystem and something that should not be overlooked in the Lake Umbagog National Wildlife Refuge.”

Support for management oriented trapping, while opposing recreational trapping was voiced in the following statement: “I oppose recreational trapping on the refuge. I support targeted, management oriented trapping -- trapping targeted to further a specific management need or goal. An example might be to trap muskrats off a dike to keep it strong or to trap fox, or mink, off a bird nesting island.”

Other people supporting furbearer management felt the Refuge should utilize New Hampshire and Maine trapping regulations: “Utilize the NH and Maine beaver trapping regulations as appropriate on refuge lands....Because furbearer trapping is a ‘traditional use’ with probably the longest history in this region, . . . urges the Service develop a trapping plan that mirrors the seasons and regulations of each state.”

One respondent considered trapping harmful but wrote that the final CCP must set limits to trapping: “Although this alternative does propose to set aside large amounts of land, it does not include limits on snowmobiling or trapping in the area. Both of these are harmful and dangerous to animals and ecosystems. Before finalizing a draft of the CCP, please consider the serious threats that these two activities would create, and set up a plan to manage these two endeavors.”

Examples of general opposition responses are: “I am opposed to trapping on Lake Umbagog National Wildlife Refuge. It should be illegal.”, and “Please do not allow cruel & unnecessary fur trapping at Lake Umbagog National Wildlife Refuge. It should stay a Wildlife Refuge.”

Some respondents wrote that they did not want to witness any wildlife caught in a trap while visiting the Refuge: “I do not want to witness any wildlife caught in a trap. I do not want to witness any companion animals (dogs/cats, etc.) maimed/killed in the traps that are allowed

to be used which are cruel - when I visit a refuge with my family. I expect a refuge to be a place where wild animals are protected from human interference.”

Commenters were at odds with the Fish and Wildlife Service statement that furbearer management can broaden appreciation of natural resources: “I am writing because the Fish and Wildlife Service is proposing to open the Lake Umbagog National Wildlife Refuge, located in New Hampshire and Maine, to recreational trappers to trap beaver, coyotes, foxes, raccoons, squirrels, skunks, and weasels for their fur. The Fish and Wildlife Service claims that allowing trapping on Lake Umbagog will ‘Foster an appreciation for wildlife and nature’, and that ‘Trapping is an activity in which family members and friends often participate and share joint experiences that broaden appreciation of natural resources and ecological awareness.’ Killing and maiming wildlife in body-crushing traps does not foster an appreciation for wildlife.”

Some respondents also commented that a refuge should be a sanctuary for wildlife and that furbearer management is inconsistent with the primary mission of the National Wildlife Refuge system – wildlife and habitat protection. For example: “America's wildlife refuges should be restored to their original purpose as safe-havens for wildlife. The National Wildlife Refuge System was established over one hundred years ago as a haven for wildlife and species. The Refuge System is the most comprehensive and diverse collection of protected fish and wildlife habitats in the world, encompassing 95 million acres of land in all 50 states. The system includes 542 refuge units and harbors more than 185 listed threatened and endangered animal species. Even though refuges were designed as sanctuaries for wildlife, the federal government allows the practice of hunting and trapping to occur on more than half of all refuges. Unbelievably, more refuges offer programs for killing animals than for watching them. Most visitors to refuges come to experience nature in a peaceful surrounding and should not have to worry about witnessing the maiming and killing of wildlife. Refuges should be maintained as true sanctuaries, not as playgrounds for trappers who already have millions of acres of lands outside the refuges to trap and kill animals.” and “A refuge is a place of SAFE HAVEN!!! It is not a place for such cruelty.”

Similarly, several commenters wrote that the majority of the public views refuges as places of protection: “Theodore Roosevelt established Pelican Islands the first refuge in 1903 as an ‘inviolable sanctuary’ for the protection of the brown pelican. The original intent and purpose of subsequent refuges were clear, the protection of wildlife from exploitation and deliberate harm. Most Americans still view wildlife refuges as places where wild animals are protected from human interference. That is in fact the common definition of the word refuge. The majority of Americans oppose the recreational and commercial killing of wildlife on National Wildlife Refuges.”

The possibility of inadvertent trapping of non-target animals (including threatened and endangered species and companion animals) also received many comments echoed in the following quote: “These types of traps allowed are cruel and indiscriminate and not only kill and maim target animals but also non-target animals such as eagles, companion animals (dogs and cats), and threatened and endangered species. Traps pose a serious hazard to the very animals that the refuges are intended to protect, including threatened and endangered species, raptors, and migratory birds.”

Other commenters specifically cited that threatened and endangered species may inadvertently become trapped: “In addition, leghold traps and Conibear traps pose a serious hazard to non-target wildlife, including threatened and endangered species (T&E species). Records obtained from state and federal wildlife agencies by API show that bald eagles, lynx, wolves, and other species listed under the Endangered Species Act have been injured and killed in leghold and Conibear traps. Recently, when citizens provided documentation that three Bald Eagles and numerous Canada Lynx had been incidentally killed in traps set for coyotes in the state of Maine, the Maine Attorney General ruled that the state Inland Wildlife & Fisheries agency had to end its coyote trapping program until the state obtained an Incidental Take Permit (ITP) under the Endangered Species Act from the FWS.

Another commenter listed specifically cited the Canada Lynx and stated, “The Canada Lynx is listed as Threatened throughout its range in the U.S. Recognition in the CCP that Refuge lands have the potential to support additional rare species including the federal-listed Canada Lynx, known to use habitats in the area, (CCP p. A-2) calls for several responsibilities to be recognized. Foremost among things the refuge should do is to enter into an ESA Section 7 consultation with the Office of Endangered Species regarding the proposal to open trapping on the refuge and admitting a possibility of taking a Canada Lynx. Listed species, both inside and outside critical habitat, are protected from ‘take,’ which includes harming (e.g. shooting, killing, trapping, collecting) and harassing individual animals. In addition, the refuge should undertake to determine if they can take actions within the Recovery Plan outline that would foster and facilitate use of refuge habitats by Canada Lynx. Surely, the refuge can have no higher priority objective than to aide the recovery of such an American icon as the lynx and the refuge is strategically located in one of the Core Recovery Areas for the species (see map at FWS website mentioned supra, under Recovery). Similarly, if the materials found in Appendix B, ‘Species and Habitats of Conservation Concern Known or Suspected on the Refuge – Mammals List’ are to have real meaning, then the likely impacts from opening the refuge to trapping must be withheld until a thorough and complete evaluation of that action on the refuge populations of the species listed.”

A respondent quoted the Refuge’s own admission of possible indirect impacts of trapping writing, “...as you say in your compatibility determination, and I quote ‘indirect impacts may include displacing migratory birds during the pair bonding, nesting season, or the destruction of nests by trampling. Direct impacts may include the catch of non-target species or the removal of species that induce habitat change, for example, beavers.’ And you add, ‘non target species could be taken through the trapping program.’ Reason #1 to not allow trapping is, why would you allow trapping knowing ahead of time that such negative impacts, such as trampling and catch of non targets would take place?”

Commenters described the limitations of specific trap types like leghold, padded leghold, and conibear: “There is wide spread agreement among veterinarians, veterinary associations, biologists and the general public that the primary traps used today — legholds and Conibears are both inhumane and indiscriminate.”, and “Despite the preponderance of evidence showing that leghold traps cause severe injuries to captured animals, most studies have actually underestimated the extent of injuries caused by these devices.” and “While padded leghold traps are ostensibly more humane than unpadded traps, studies confirm that even padded traps can cause significant damage to trapped animals.”, and “As a trap designed to kill animals instantly, the Conibear poses a serious hazard to T&E species and other non-

target wildlife. While studies suggest that the ability of kill-type traps to produce rapid death have been greatly improved, for a number of species (Proulx et al. 1989; Barrett et al. 1989; Proulx et al. 1990; Proulx and Barrett 1993; Proulx et al. 1995) there have been no significant advances in reducing non-target captures. Research has shown that for every target animal captured at least 2 other non-target animals are caught (Novak 1987; Barret et al. 1989; Proulx and Barrett 1993). The California Department of Fish and Game reported that, “Several factors keep this trap from killing consistently and quickly, including the size of the animal, the species involved, the position of the animal at trap closure, and the impact and clamping levels of the trap. The most significant flaw is the trigger system that performs erratically, preventing a fatal blow to the animal’s body (CDFG pg. 94).”

Along a similar line of reasoning, a commenter questioned the validity of Best Management Practices in trap design and trapper integrity: “Further we find the Compatibility Determinations assertion that ‘Fur Resources Technical Subcommittee of the International Association of Fish and Wildlife Agencies, “systematically improves the welfare of animals in trapping through trap testing and development of ‘Best Management Practices Best Management Practices for Trapping Furbearers in the United States,’” to be self serving with no basis in fact. There is no evidence that the BMP NTTP program has improved the welfare of trapped animals. References should be included in the CCP when such subjective claims are made and stated as fact. The BMP NTTP research has not been open to public review and representatives from the humane community have been prevented from participation in the national trapping work group. Public oversight and accountability, if allowed, would likely reveal a waste of U.S. tax dollars on redundant and unnecessary trap research that has done little to prevent cruelty to trapped animals. As such, refuge participation in this program should not be used as justification for allowing trapping on the refuge.” Commenters also claimed participation in Best Management Practices by trappers is voluntary, thus negating the positive effects of the program: “On page C-68 of Appendix C, Compatibility Determination – Furbearer management, the U.S. Fish & Wildlife Service states that the Best Management Practices for Trapping of IAFWA ‘improves the welfare of animals in trapping.’ This statement above is baloney. As I said when I gave my public testimony in Concord, NH, I took a trapping education class sponsored by the NH Fish and Game Department. The certified educator trapper who gave the class showed us some of the ‘new’ traps that came out of the best management practice studies. First, I doubt very much if any of the so-called improvements he showed us would matter very much in helping to eliminate the suffering of animals caught in them. But that doesn't matter, because these ‘improvements’ are totally voluntary for the trappers to use and as this trapper told us, he sticks with his same old traps and doesn't use the new inventions. I am sure this is true of most trappers if not all.”

Some respondents suggested non-lethal alternatives to trapping proposed in the furbearer management plan: “Whether there is an actual or perceived need to control wildlife there are many humane, non lethal, methods available to resource and refuge managers to alleviate conflicts. For example, with regard to beaver conflicts, the construction of water-level control devices could be used to prevent flooding and could serve as a humane substitute for trapping and killing beavers. Such devices have been successfully implemented by municipalities and state wildlife agencies in a number of states, including Maine and Connecticut, and should be used more frequently by federal wildlife management agencies.”, and “Improved non-lethal methods, such as sheltering animals at night, aversion techniques,

fencing and guard animals, can be used to protect livestock while allowing predators to continue their important roles in ecosystems.”

A respondent attached a Trapping Fact Sheet including ten Trappers' Claims and the subsequent Rebuttals. Two such examples are included here: “Trappers' Claim #1: Trapping is strictly regulated and enforced by the Fish and Game Department, which is staffed by professional wildlife biologists and conservation officers. REBUTTAL: Trapping is largely self-policed with little actual oversight by conservation officers. Conservation officers only investigate when a complaint about a trapper is communicated to the department. In general, the ‘honor system’ predominates in the trapping world. Conservation officers do not initiate any investigations of trappers' behavior on their own, and they rely exclusively on information submitted by trappers to draft annual performance reports.”

Trappers' Claim #3 Each state restricts which species can be trapped and which kinds of traps can be used.

REBUTTAL: Although trappers and WCOs are required to submit annual reports to the NH Fish and Game Department listing their catches, there is no accountability for failing to report trapping of species that are not allowed to be trapped under state law, including species that are considered non-game, such as dogs and cats. Trappers have a disincentive to be truthful about catching and killing animals for which no trapping season exists, since public knowledge about such activities would endanger their lawful activities. Again, since steel-jawed leghold and Conibear traps make no distinction between species with and without trapping rules, it is highly probable trappers kill and maim many animals each year that cannot be legally trapped and for which no penalty for non-reporting exists.”

Respondents took issue with the stance that furbearers are a natural resource with cultural and economic values and for example wrote, “According to wildlife managers, ‘furbearers are considered a renewable natural resource with cultural and economic values.’ I consider furbearers - indeed, all wildlife - as more than simply resources with economic value.”

One respondent encouraged trappers to view the Refuge from a different perspective by writing, “Trappers should look at the refuge as a place where their prey can thrive and produce the ‘excess’ available to populate neighboring lands, thus making the resource available in perpetuity.”

Analysis

Commenters questioned that the Refuge has not done adequate analysis or study to justify trapping as a furbearer management tool.

For example a commenter wrote, “The CCP/EIS states that trapping could be used as a tool to manage furbearing animals. The CCP/EIS asserts that its analysis of this program will discharge all responsibilities under NEPA. The description of the program, however, is insufficiently detailed to complete such an analysis. A full project description is a necessary component of NEPA documentation. The description of the trapping program in the CCP/EIS is as follows: ‘At refuge manager's discretion, use trapping as a furbearer management tool to achieve objectives; refuge lands would be open to trapping consistent with respective state regulations and seasons (p. 2-102). Under all alternatives, our furbearer management program may include trapping as a management tool. . . And minimize threats of disease to wildlife and humans (p-28).’ This description is simply inadequate to assess the potential impacts of the program.”

Also, it was requested that the revised CCP/EIS provide the following information addressing population, accurate trapping statistics, damage caused by overpopulation: “Current and historic (last 20 years) population status of species targeted in refuge trapping and or lethal control programs. Number of target and non-target animals trapped each year under the past trapping program(s) and projected data on number of animals trapped under any proposed action. Impacts of species-specific ‘overpopulations’ on ecosystem and / or other species. Description, and degree, of damage to facilities/habitat as a result of perceived ‘overpopulations’ of targeted species, if any, and effects of trapping or lethal control in past years on perceived damage and on targeted species populations.”

Several commenters asked that the Refuge conduct biological inventories to determine species population densities to verify warranting furbearer management. “Requirements of the National Wildlife Refuge System Improvement Act of 1997: The Act requires that the FWS ‘ensure the biological integrity, diversity and environmental health of the [Refuge] System are maintained’ (Section 7(e)(2)(B), National Wildlife Refuge System Improvement Act) and that refuge planning be firmly grounded in these concepts. A thorough discussion and investigation of the biological integrity, diversity, and environmental health of a refuge must therefore occur before planning can ensue.”, and “If no surplus is determined, then, unless the species is damaging or destroying federal property within a refuge, the species cannot be subject to live removal or lethal control, including through official animal control operations.” It was also suggested that the Refuge did not conduct its own surveys: “In lieu of conducting its own surveys and evaluation it appears the Service has relied heavily on state wildlife agency data and season limits which have not been independently and rigorously evaluated by the Service. Maine for example does not require trappers to report the number or species of animals they trap each season. Instead they rely on ‘fur dealer or buyer reports’ which have little correlation to the actual number of animals trapped and typically underestimate the total number of animals trapped. To attempt to determine compatible wildlife-dependent recreation for Lake Umbagog NWR prior to completing a thorough biological inventory may violate federal mandates under the Act. This is especially true for hunting and trapping since both activities result in the direct and intentional removal of species and can negatively impact populations, particularly when such activities are geographically focused to particular regions/areas.”

Finally, a request was also made that the FWS discuss and evaluate the population demographics, alternative strategies, and protection of non-target species, and feasibility of implementing non-lethal water-level control devices and methods.

Floodplain, Lakeshore, and Riparian Habitats and Species [11.0]

Wildlife Species [11.3]

Respondents commented on the variety of wildlife species found within the Lake Umbagog National Wildlife Refuge, including endangered or threatened species. “The astonishing amount of wildlife” is rational for respondents support for expansion of important habitat.

One respondent identified the bald eagle and osprey strategies presented in Alternative B as assisting in the achievement of Maine’s bald eagle management objectives. Several

respondents commented about the woodcock and the challenges found in its protection. There was support for the management of the 2,664-acre woodcock focus area.

One respondent concerned with Rusty Blackbird habitat, recommended changing Goal 2 (p. 2-52) to include identification of suitable habitat and breeding bird surveys for this species. They state “Rusty Blackbirds nest in riparian forest with a substantial spruce/fir component. Not all the riparian forest on the refuge is likely to be suitable habitat. . . .”

Concerned with the relocation of Osprey pairs, one respondent recommends making changes to Objective 2.3 (pp.2-56+), “The discussion of Osprey population trends implies that observed changes are more a function of survey effort than population change. . . . There is no question that the presence of Bald Eagles has caused Osprey pairs to relocate their nests away from areas actively defended by the eagles. However, this redistribution, and a time-lag in locating the relocated nest sites, does not imply a population decline.

Upland Forest Matrix Habitats and Species [12.0]

Active management of upland forest matrix habitat is both welcomed and discouraged by respondents. Those in favor of timber harvest see it as an important part of the culture and economy of the area. Forest management strategies outlined in Alternative B are supported by several respondents. One respondent observes, “Forest management is considered compatible, but seemingly only as it is conducted by the FWS, requiring additional staff. Surely this is an opportunity for at least a public/private partnership with the landowners and conservation agencies, not to mention the states.”

Several respondents are not against forest management, but cite reasons for minimizing it on Refuge land. Reasons include a lack of aesthetics, “the current status of the timber market, and the need to provide undisturbed protective areas for wildlife,” and not liking “the way logging has changed the surrounding areas.”

One respondent does not support logging for commercial purposes and believes any logging should be a temporary activity.

Several respondents recognize that the State of New Hampshire owns lands and holds conservation easements within the Refuge boundary. It is further recognized by many that the State the right to manage this land for a variety of purposes.

Habitats (Spruce-Fir; Mixed Woods; Northern Hardwoods) [12.2]

Respondents are pleased with the proposal to acquire upland tracks for wildlife habitat. One respondent concerned with Black Duck habitat is pleased with the proposal to acquire upland tracks in fee, viewing it as an opportunity to restore spruce/fir forests by promoting conifer regeneration. A respondent concerned with shelter for wintering deer also supports management of spruce/fir stands.

Wildlife Species [12.3]

One respondent supports Alternative B and the “Provision of connectivity of forest habitat types for wide-ranging mammals. This objective will benefit species such as Canada lynx, bobcat, pine marten, and fisher.”

Lynx [12.3a]

Respondents are concerned with the effects of furbearer management on Canada lynx. “The CCP/EIS does not contain adequate measures to protect lynx from ‘take’ under the trapping program . . . Canada lynx can and have been killed by traps set for other species. The trapper education described in the CCP/EIS will not eliminate this potential route for ‘take’”.

Avian Species [12.4]

One respondent states that they “cannot support the selection of Blackburnian Warbler or Black-throated Green Warbler as the focal species for the Spruce-Fir habitat type, particularly because they are designated, and appropriately so, as focal species for mixed forest. If spruce-fir habitat is to be recognized as a High Management Priority Habitat, which we strongly support, it is critical to select focal species that can accurately indicate the quality and extent of that habitat. Spruce Grouse, Black-backed Woodpecker, Yellow-bellied Flycatcher, Gray Jay, Boreal Chickadee, Brown Creeper, Yellow-rumped Warbler, and Bay-breasted Warbler provide good candidates for focal species. Many of these species are not readily detectable on road-based Breeding Bird Surveys, leading to assessments of low relative abundance. Several of these species are no longer abundant in the region in large measure because of past and continuing forest management. While this refuge may not be in a position to make a significant contribution to their populations at the Bird Conservation Region scale, the refuge can play a critical role in maintaining populations of these species in the more local landscape of the White Mountain Ecoregion and its Mahoosuc-Rangely Lakes Subsection. In addition, increases in these species will be useful indicators of increasing proportions of spruce and fir in currently mixed forests, which numbers of Blackburnian and Black-throated Green warblers are unlikely to reflect.”

Priority Public Uses [14.0]

Generalized comments concerning priority uses are typified by the following comments: “My family and friend would like to maintain the area for future generations to use. This includes access, hunting, fishing, hiking, boating, canoeing, etc., berry picking, swimming, etc. Please respect our wishes and help support a well managed area governed by NH current laws.” and “The land should not be changed! It should be enjoyed in the capacity that it always has been for generations! If you start taking away the fun activities like fishing, boating, hunting, picking any kind of berries, or any other activities not only will that hurt the refuge, all sorts of wildlife management, but it will hurt the community which depends on all sorts of fisherman, hunters, campers, bikers, tourists, and boaters. The territory should not be tampered with in any manner.” and “I do not support increasing the size of the refuge in conjunction with limiting recreational activities. I do support allowing the following recreational activities and I feel that the wildlife can continue to thrive with these activities. 1) The use and maintenance of existing logging roads . . . 3) Fishing... 4) Hunting according to state laws and seasons. ..6) Rabbit hunting with dogs. ..7) Coyote hunting with dogs. ..8) Bear hunting with dogs. ..13) Organized cross-country skiing.”

People wrote that the Refuge should ban consumptive uses: “A wildlife refuge is meant to protect the lives lived within it, not to provide a “shooting fish in a barrel” situation. Please act now to ban ALL consumptive activities on the refuge.”

A respondent didn't want to have to leash their dog: "Public land is for everyone to enjoy, use with respect and dignity - large majority does. I do not feel that we should have to leash our dogs when in the woods and hope that is not a law ever."

The Refuge was urged to manage public uses and recreation with caution; it should primarily provide for the ecological health of the area: "The National Wildlife Refuge is an outstanding resource for the six priority public uses as outlined by the Refuge Improvement Act (hunting, fishing, wildlife observation, photography, environmental education, and interpretation). However, as the Refuge's public use programs grow, it is imperative to ensure that public uses in the Refuge leave the natural environment undamaged. All recreational activities should be managed with a cautioned, principled approach that prioritizes the ecological health of the Refuge; the CCP should state as much, in addition to outlining how priority public uses will factor into the management of the Refuge."

Visitor Safety [14.2]

Respondents felt that the Refuge's proposed furbearer management program could cause a threat to public safety: "The FWS does not address public safety in its Compatibility Determination for furbearer management (though it does for hunting and fishing), and, has altogether failed to show that trapping would be an activity 'consistent with public safety' (P. 1-30) The Service mentioned that some people in opposition raised concerns about 'visitor safety' (p. 1-30). The Service has wrongly concluded that furbearer management via trapping is compatible with the Refuge. Specifics follow. 1. The fact is there would be significant exposure path to harm to the unsuspecting visitors who would expect that they could wander through the uplands and wetlands without risk to themselves, their children, or their dogs becoming victim to a trap. This is because the traps would be set out of sight and could be anywhere in the areas frequented by wildlife and thus by people seeking to view wildlife. To set off a trap, all a dog or person needs to do is step on the hidden trigger. People do not routinely bring tools with them to disengage themselves or their dogs from traps, and trappers are not present to offer help. Trappers set these 'time bombs' that go off when the trapper is usually long gone from the area. 2. The fact is that the Service is already exposing the public to safety risks because of suspected illegal beaver trapping that is taking place on the Refuge (p. 3-48). Illegal activity cannot be deemed safe for the public. Illegal trapping by virtue of it being 'illegal' is unsafe, because it is not conducted according to rules understood by the visiting public or enforced by Law Enforcers. The visiting public expects laws to be actively enforced. 3. The fact is that NH F&G Department Law Enforcement is stretched very thin and already provides very weak oversight of actual trapping. Furthermore, the illegal beaver trapping already suspected as taking place at the Refuge raises serious doubts that Refuge law enforcement (p. C-66) will conduct strong enforcement of all trapping laws and regulations, putting public safety at risk. 4. In the CCP I didn't see any stipulation that trappers place signs near their trap sets to warn the unsuspecting public, or that the Service would place warning signs at all entry points to the Refuge that trapping is taking place at the Refuge. Since some people and, of course, dogs would not read the signs; even signs would have a limited public safety benefit."

Another respondent had safety concerns due to proposed hunting: "I am afraid to even hike in areas where hunting is allowed, for fear of being accidentally shot or my pets being poisoned or trapped. It's not right for hunters to get to own a public area that way."

Emergency evacuations and situations was another concern: “Access to help in emergency situations is a concern. One point-of-view is that wilderness camping does not come with a 911 number. However, remote site camping along the Umbagog shoreline, especially as made easy for families (including youngsters and elders) by the NH P&R CG pontoon boat ferry service, puts this in a somewhat different light. We have encountered the following ‘emergency’ situations: a mother and her children left by the husband at a remote site for a week who needed to leave early but didn’t know how; a camper who was trying to deal with an extensive underground root fire he discovered at a neighboring unoccupied campsite which was well beyond extinguishing by individuals; our own family having to leave early because of nightly visitation and camp supplies devastation by a rogue black bear. One way to provide security might be for a Ranger with a radio to make a daily patrol on a pre-published schedule in a fast boat of all remote sites, who slows and waves near each site so that a camper could be sure to be present and looking at this time to get help coming if needed. Current policy is that remote campers can get help by waving a towel from the shoreline, but this is very minimal (Umbagog water expanses are long, many motorboats are out there, can’t tell which are Ranger boats so would have to be constantly waving with little effect).”

Access [14.3]

People expressed that the Refuge is public property belonging to the public and should remain accessible as echoed in these sample quotations: “Following our earlier conversation about Umbagog Wildlife Refuge I want to weigh in with a few comments: This public property belongs to everyone and should be open to all based on available use and respect of the natural and manmade resources in Coos County and Oxford County Maine. I urge that longtime landowners around Lake Umbagog continue to use the lake and public property as they have for many years---with respect and dignity. There is an under-current feeling that this new approach in studying will somehow end up restricting public use in the years ahead. This is public land and should be used by the public.” and “If the land owned by the National Wildlife Refuge is public land that our money went toward buying, then the public should be able to use it however they want. Most of us have been doing this for many years, with permission from landowners -- it's a give and take system where we let each other use our land for the different activities we love. For the most part everyone acts responsibly and respectfully towards wildlife and landowners (And when they don't, we know how to take care of it appropriately and effectively without specialized law enforcement, of which we already have enough, quite frankly).”

Likewise, others opposed the perceived increase in restrictions and regulations regarding access in the proposed plans: “By further restricting boat, vehicle, and walk-in access to this area, and by stepping up law enforcement patrols, you are shutting down the wonderful region to the very people who enjoy it and take care of it.” and “Because I have spent the past 20-25 years on the lake, I understand the dire necessity of keeping access open on both the lake and the logging roads. The proposed restrictions are unacceptable.”

Some felt the Refuge should limit public access for specific reasons such as habitat protection for example stating, “As we have enjoyed the waterways of the area, we would oppose any curtailment of public access. The only exceptions should be when human activities negatively affect wildlife habitat or other natural resources. These exceptions

should only be put in place after a convincing public demonstration of the scientific reasons they are needed.” and “My hope is that public access and recreation will not be curtailed, unless degradation would occur.” and “While I participate in recreational use of the refuge and boat on the lake, I do not believe there should be motor vehicle access to transport boats to all lakes near or within the refuge. Easy access will inevitably lead to relatively heavy use and frequent disturbance of various types. Wildlife should be assured of the security that isolation from people can provide. For similar reasons, it may be necessary to limit the number of recreational boats of any or all types that use the lakes. Ideally this can be determined for each type of boat and for each season.”

Similarly, others felt that some areas of the Refuge should only be accessible by certain user types: “I also favor making some portions of the refuge, less accessible. By making access to some areas more challenging (walk-in only for instance), visitors get to those locations in fewer numbers and those willing to tackle those challenges have a more rewarding wilderness experience.”

Respondents felt that the Refuge should limit motorized use reflected in these quotes: “Please keep it accessible as wilderness - for people who come under their own power, on foot, on skis, in canoes. Motors degrade the air and water, disturb birds, beasts and fish, and wall us off from the sounds of nature.” and “However, none of the plans give sufficient consideration to motorized vehicle access and hunting and trapping. These uses are antithetical to the primary purposes that should be served by a wildlife refuge. Therefore, the final plan should limit or ban motorized vehicle use in the Refuge and other activities detrimental to wildlife.”

Another commenter wrote that the best way to protect an area is to open the area to responsible recreation thereby promoting better relationships with the public and developing greater respect for the land: “As we’ve seen elsewhere, the best way to protect an area is to open it to responsible recreation such as canoeing, camping, fishing, hunting, hiking. The best way to protect it is to build a constituency among those who experience the magic.”

Assurance of continued public involvement and comment solicitation regarding possible access limitations to private property promoted this response, “I may have read somewhere that backwaters on the upper Magalloway will be closed during this ‘protecting’ time. Our family camp is on a backwater of what may or may not be the ‘upper Magalloway’, and there are several homes in Wentworth Location whose river access might be curtailed. Not to mention access for canoes and kayaks via the new launch in Wentworth Location. I suspect the townspeople as well as my family would want to be involved in any decision to close off access to the main river. As regards closing ‘unnecessary forest interior and secondary roads’, I would invite public comment as to which roads are necessary and which are not.”

A respondent claimed that public access to State of New Hampshire lands was entitled through conservation easements on those lands: “Appropriateness and Compatibility Determinations: These did not recognize the rights to public access, including snowmobile trails, the State of New Hampshire holds through its conservation easements.”

Another respondent wrote that the local economy depends on access to the lake for recreation and transportation: “Because my husband was born and raised in Berlin, NH, I know the region well. The local economy has struggled for years now, and does not seem to be improving. The people need this lake to remain accessible for both recreation and transportation purposes.”

One comment considered the proposed access to Sturtevant Pond too large, writing, “The proposed access to Sturtevant Pond is too large and should not occur.”

Hindered or curtailed access for non-hunters during hunting season to wildlife refuges allowing hunting motivated a respondent to write: “As a visitor to wildlife refuges which also allow hunting, I have frequently been unable to visit when I most wanted to - during seasons in which the hunting was allowed. During these times, the refuges were either closed to anyone without a hunting license and/or dangerous for a hiker/watcher/photographer.”

Hunting [14.4]

Many generalized requests asked the Refuge to ban hunting within its boundaries as illustrated in these selected quotes: “After one reads all the bureaucratic language in your draft conservation plan what is clear is that the name should be changed or hunting should be clearly prohibited.” and “This area needs to be truly a refuge - hunting and trapping should not be permitted! This area of northern NH has so many areas to hunt and fish, there is no reason why a wildlife "refuge" should be open to hunting.”

The Refuge was asked to consider the impacts of hunting and analyze the negative impacts to non-hunting visitors to the Refuge: “The impact that the activities of the small minority of Refuge users who hunt has on the enjoyment of the majority who do not hunt has not been adequately taken into account by the FWS, even though a fundamental purpose of the Refuge system is to provide recreational opportunities for the American public. Indeed, the history of wildlife watching in National Refuges is far longer and more extensive than the history of hunting, which has only in recent years taken place on any significant scale. The impacts of expanded hunting on the experience and potential socioeconomic contribution of these non-consumptive users must be properly taken into account.” and “The CCP/EIS process should accurately assess the impacts of hunting on non-hunting visitors. The CCP/EIS claims that ‘Although conflicts between user groups can occur, that does not appear to be a significant issue at present levels of use’ (CCP/EIS, p. C-142). This conflicts with the analysis in the April 2007 EA, which stated that if hunting were banned, ‘There could be some increase in recreational use by the area by non-hunters, who may avoid the refuge during hunting season’ (EA, p.9). It would certainly be considered a significant adverse effect if certain user groups avoid areas entirely because of the presence of hunters. This is likely to be the case; non-hunters generally stay out of the woods during hunting season. The CCP/EIS should evaluate this impact and the relative size of the user groups that would be adversely affected or be benefited by banning hunting in the refuge, or restricting areas on the refuge where hunting is allowed.”

The Refuge was asked to consider the impacts of hunting and analyze the negative impacts to wildlife: “The CCP fails to evaluate the impacts of consumptive use activities on refuge wildlife. As mentioned above, a biological inventory has not been fully implemented, and there is a lack of accurate data on hunted and trapped species on the refuge presented in the CCP. As a consequence, we assume that the biological baseline data is inadequate or nonexistent. We question how hunting and trapping can be deemed compatible on the refuge in absence of this essential information.” and “Aside from the obvious detrimental effects to the individual animals killed, hunting disrupts, resting as well as foraging behavior and increases stress and caloric exertion which potentially decreases fitness and survival. These factors should be systematically researched before a compatibility determination is assessed.

The Refuge was asked to consider the impacts of hunting and provide compatibility determinations: “The CCP/EIS also fails to provide adequate compatibility determinations for both trapping and hunting activities.”

The Refuge was asked to consider the impacts of hunting and analyze alternatives to hunting: “Rationale Offered in Support of Hunting Season is Not Supported by Current Science - Because the CCP/EIS presents no alternatives that do not include hunting, the document does not provide a detailed rationale for the hunting program.” “Furthermore, it is true that hunting is sometimes intended to manage wildlife populations, but without details about the desired outcome of such management and its success, this past use cannot be taken as a scientifically supported rationale to implement a new hunting program. With these two reasons aside, the documents associated with the CCP/EIS do not contain adequate information to factually support the remaining reasons for a hunting program. The compatibility analysis in the CCP/EIS refers only to three other FWS document, while the April 2007 EA contains references to a single peer-reviewed article. The CCP/EIS therefore contains insufficient scientific information to validate its claims about the hunting program (or the trapping program, see below). The reasons that are given to support the hunting program lack detail and are not founded in current knowledge of the functioning of natural ecosystems.”

The Refuge was asked to consider the impacts of hunting and determine baseline carrying capacity populations and define overpopulation parameters: “General reference to carrying capacity is an insufficient rationale to justify a hunting program. No evidence is presented that the Lake Umbagog NWR suffers from an overabundance of deer or moose, the two species mentioned in this context. Indeed, the management plan calls for the maintenance of deer wintering areas to keep deer populations high. At northern latitudes, severe winters exert a strong influence on deer populations [iii]. In the event that winters are severe, overabundance is unlikely. The claims that a hunting program is needed to keep deer and moose populations in check and that protecting deer wintering grounds is an important conservation priority are not simultaneously terrible. The only rational interpretations of these two actions is that managers wish to maintain populations of deer large enough that they can justify "managing" them through hunting, rather than allowing climatic conditions, available resources, and predators to regulate the populations, as they would in an intact natural system such as the LUNWR.”

The Refuge was asked to consider the impacts of hunting and analyze the effects of hunting to control disease: “Although the CCP/EIS suggests that hunting may be used to reduce the risk of spreading communicable diseases. This claim deserves far more detail than is provided and it appears to be contradicted by current research. Recent population modeling has shown that hunting may actually exacerbate disease in populations, increasing both disease prevalence and the absolute number of animals infected, which "clearly increases the risk of cross-species disease transmission into domestic and livestock populations." [vi] Furthermore, hunting puts humans into contact with potentially infective animals that they would not encounter in non-consumptive uses. Chronic wasting disease has not yet been recorded in Maine or New Hampshire, but it is found in the eastern US. [vii]. The avenue for disease to be transferred to human populations would be hunting and consumption. Therefore more scientific evidence is needed to support the assertion in the CCP/EIS that hunting is an avenue to control the spread of communicable disease.”

Again concerning analysis, a respondent citing a recent court ruling requested the Refuge analyze the cumulative effects of hunting: “Moreover, the recent ruling by U.S. District Judge Ricardo M. Urbina that the U.S. Fish and Wildlife Service violated federal law by expanding hunting at 37 refuges from 1997-2003, should be seriously considered. The statewide and national cumulative impacts of allowing hunting and other consumptive uses on this refuge should be thoroughly and objectively evaluated by the CCP and EIS.”

A respondent claimed that hunting is not an appropriate management tool to mitigate collisions between wildlife and vehicles stating, “The claim that a hunting program will help reduce collisions between wildlife and cars is not supported by the scientific literature. In a three-year study, deer-vehicle collisions did not decrease even though local deer populations were reduced. [iv]. The reliable only way to reduce deer-vehicle collisions is to maintain proper fencing on main roads [v]. Hunting is simply not an appropriate management tool to address this concern.”

Some examples of generalized comments in support of hunting include: “I have provided a copy of an article published on the Umbagog Natl. Wildlife Refuge, in Coos Co. New Hampshire. Article can be found on page 30. As you will see, I strongly support the position of continued expansion and opportunities for expanded hunting and fishing.” and “I support hunting, fishing, trapping, boating, snowmobiling and forest management for the Lake Umbagog region.”

There were a variety of comments concerning the hunting regulations used on the Refuge. Some comments uttered confusion as to what regulations were actually followed, others felt the Refuge should only utilize State regulations, and some felt the Refuge should have stricter regulations.

Confusion concerning hunting regulations used by the Refuge is expressed in the following comments: “So, some of the things that I’ve seen that are in the book that I’d like to point out - that I’d like to have changed is on hunting. I’m an avid hunter and sportsman, and in there, it is stated that would be something that if it is in conflict with a visitor, that that may be something that may be changed by rule by the Park Manager. I think that needs to be looked at. The Maine/New Hampshire Lake borders both Maine and New Hampshire. It is already heavily patrolled by Fish and Game from both Parks - I mean both states, and I think that adding the government in that dimension is just going to confuse everybody and I have a concern with that.” and “I also believe that the people who have hunted this area their whole lives need to go by 2 different law books - Refuge rules and Regs & State if on Refuge land. I’m not sure that hunters know this, not all of them anyway. I feel that someday hunting will be prohibited on refuge land. Public land is for everyone to use and enjoy, let’s keep it that way.”

Some respondents believe refuge hunting regulations should be more restrictive. One commenter stated, “I ask you to recognize that this refuge should be seen as different from the rest of NH and ME, and therefore not have the same generous hunting or fishing seasons. . .”

Others feel the Refuge should follow the State hunting regulations. This sentiment is expressed in the following comments: “The NHWF believes the regulations outlined by NH Fish & Game are sufficient with respect to hunting and fishing and believe state Fish and Game regulations should be followed in that portion of the refuge that falls within the State

of New Hampshire.” and “I do not support that you have selective hunting on the refuge. I realize that there are some game that needs to be protected but there should not be any different laws from what the state has in practice.”

A respondent who felt the Refuge should follow State hunting regulations and that its current hunting regulations were anti-dog wrote, “It's the little laws that were slipped in after the sale that bothers me and a lot of other people. For example, before you bought out the land that abuts me I could let my beagle out and he would chase hare's for a couple hours and come back to camp without bothering anybody. Now, I can only do this for two weeks in Oct. Why? I got a feeling that whoever came up with these rules, was bitten by a dog when he was child. Most of your hunting laws are very anti-dog. Why didn't you just use the same laws as the state does?”

A commenter considered the establishment of an interstate working group to annually review hunting seasons for consistency in both states a standout strategy.

Another commenter requested that a large area of the Refuge be designated as traditional weapons only: “Finally, my own personal wish - A large area should be designated as traditional weapons only, no matter what season. This means no inline muzzleloaders, no compound bows, and no modern rifles or handguns. Pennsylvania has a flintlock-only deer season and it is so safe that it is the only gun season where you don't have to wear hunter orange. Imagine the safety and wildlife you would have if the only weapons used were traditional bows and old fashioned flintlock rifles.”

Waterfowl [14.4a]

Finally, a commenter wanted the Refuge to leave duck hunting alone stating: “Duck hunting is another subject that shouldn't be touched. It should be left the way it is and I agree with ‘If it isn't broken do not fix it!’”

Fishing [14.5]

Respondents asked the Refuge to ban fishing because it is a consumptive use.

Recreational fishing contributes to pollution was a thought voiced in this quote: “I have also witnessed these sports first hand contributing to pollution of recreational areas. Fishermen leave line, bait and sometimes beer cans along the shore and in the water. I have seen too many fishing lines tangled up around a tree or bush in the water. I have seen birds that become entrapped in the line which has lead to their death.”

Typical representative pro-fishing comments include: “. . . fully supports the opening of the refuge officially to fishing.”

A commenter was concerned that more regulations would restrict fishing: “It also states that we have a privilege to fish, basically that could be shut down at any time. I don't understand that. There have been people fishing here for years, eons. So I guess there is a high ‘nanny factor’ . . . what I call a nanny factor, when the government becomes involved.”

Several commenters voiced concerns over restricting fishing contests on the Refuge stating, “For many years, local people were able to hold small scale ice fishing derby's on Lake Umbagog. In fact, one year I won such a Derby by catching the largest fish. But trying to convince the current Refuge Manager to allow exactly the same type of ice fishing derby that

we had in the past is now an exercise in futility.” and “You know, as far as like no fishing contest. I mean, what harm is that going to do? Come on - we need to bring people in and have them want the Refuge.”

Finally, a commenter applauded more fishing access sites and suggested fishing education like fly-fishing: “Fishing sites. Yeah - more fishing sites. Hey, maybe over at the Potter Farm - have some fly tying classes for the young people. Get them involved. Show them how to fly fish. These are the things that will bring people to the Refuge and interest in the Refuge. we need to bring people in and have them want the Refuge. Say, gee, this is great having this Refuge. Look at what my kids are learning. They are learning how to fly fish.”

Wildlife Viewing/Photography [14.6]

There were several generalized comments appreciating the opportunity to view various wildlife at the Refuge.

Interpretive and Environmental Education [14.7]

Several commenters wrote saying the Refuge should increase its efforts in environmental education: “I would suggest that regardless of where any new headquarters might be located, one of the major considerations should be an effort to increase the important educational programs emanating from that headquarters. Here is a chance to continue to inform people as to the ecological impacts of human activity, as well as offering exciting opportunities to protect this special place from people erosion.” and “AMC supports the approach offered in both Alternatives B and C to undertake more vigorous environmental education programming and natural history interpretation. These activities will increase understanding of the value of the refuge by local residents and visitors, and are a critical tool for developing the next generation of outdoor enthusiasts and conservationists. Developing a visitor center in Errol in cooperation with the town, local organizations and businesses would help visitors find comprehensive information about recreation activities in the refuge and in the broader region. Such a center would also provide a location for disseminating Leave No Trace and other visitor safety information.”

One commenter suggested conscious outreach to non-profit environmental groups by the Refuge in establishing its environmental education program: “I found the definition presented at the public meeting to be limiting and not consistent with most definitions. However, I suggest that informing the public, school groups, and other groups through education/interpretation should be a high priority. Beyond the interpretive approaches mentioned, you have indicated that other groups would be welcome to deliver EE programs. I would suggest that there be conscious outreach to non-profits to encourage the establishment of EE programs.”

Other Public Uses [15.0]

Many comments were received concerning other public uses. Most of these comments are reported under specific categories below such as Remote Camping or Boating. However, some comments were directed at the general management direction of other public uses.

Respondents expressed a desire for more public use of Lake Umbagog NWR and the corresponding recognition and participation of the FWS. For example, one commenter's statements were echoed by some: "Of the many things that concern my neighbors and me, one is the wording of your priority recreational activities. According to your documents, these six activities are allowed. My concern is that you're simply going to allow these activities; why not develop them instead? Work with groups and community members to enhance the snowmobile trail systems; hold catch and release fishing derbies, and have expert demonstrations and speeches at your new headquarters about the wildlife, the recreation, and the people in the area. Work to increase opportunities to recreate on your refuge, and it will help appease the locals as well as bring more people to enjoy our beautiful area." Another person added, "I hate to see our traditional uses abandoned so that no one can use the refuge." In more specific terms: "The recreation uses on the refuge need to be changed from the current 'Only the focus recreation uses are permitted' basis to all recreation uses are permitted except specific recreation uses identified by the Refuge Manager which after public hearings are prohibited. There are over 30 popular forest- and water-based recreation activities that are listed in the NH Scorp that are prohibited in the refuge and if the refuge expands will dramatically reduce tourism and recreation participation in the local economy and the North Country." Another letter states a more restrictive opinion: "TWS major concerns are about unmonitored and incompatible snowmobile use, trapping, logging and the wilderness assessment... We do not support the use of wildlife dollars to purchase land for motorized use." Some of the traditional uses mentioned in other letters were snowmobiling, boating, cross-country skiing, mountain biking, horseback riding, dog sledding, camping, camp leases, picking berries, picking mushrooms, fishing, hunting, and float planes landing on the lake.

Another issue that arose regarding management direction was the need to establish a process to create new campsites and trails. One person wrote that, "it appears that only existing campsites and snowmobile trails will be allowed. There should be a process for approving and establishing new campsites and snowmobile trails." Another specified, "we've got some camping sites that you can pay \$11 a night and that's not a problem...when you bring more people...you need more camping sites."

Remote Camping [15.1]

A few comments were directed towards remote camping, and these comments tended to be very specific in their requests. Most letters in this category argued the importance of keeping remote camp sites open and/or establishing new ones.

A few letters addressed remote campsites for paddlers. For example, one commenter stated: "I would like to express a concern about the limited number of campsites available to paddlers as the Refuge seeks to further enhance habitats for selected refuge focal species. Our organization would be among the first to support your efforts with habitat protection, but we also want to partner with you to ensure adequate paddler access to camping. For example, we support the decision to close Pulpit Rock and the site near the Eagles nest, but at the same time, we are concerned that these closures place considerable pressure on existing campsites. In light of this, and when combined with competition for sites by the powerboat constituency and the increasing number of paddlers visiting the area, we encourage the Refuge consider expanding the number of sites in non-sensitive areas. I would like to propose the

development of a limited number of dedicated sites with no road access to server paddlers primarily. Specifically, I encourage consideration and study of the creation of 2-3 sites on the Magalloway River between Route 16 and Harper's Meadow. These sites would provide important mid- point campsites off the Lake, but within a comfortable paddling distance as kayakers and canoeists traverse the NFCT between Errol and Rangeley.” Another letter proposes that remote camping sites to be added for canoe access “within 450’ of Rt 16 and the N-2 location,” which could be “easily monitored, maintained, and managed.”

Others addressed remote campsites in other terms. One letter, concerned about closures, stated: “The CCP cites concerns about degradation of the sites from overuse, and the possibility that some sites could be closed. We urge the USFWS to instead address the management issues that have resulted from heavy use rather than limiting remote camping opportunities. We believe Alternative B offers objectives and strategies to address these issues, and again, AMC offers its experience and knowledge in backcountry recreation management as needed.” Another person had issues because “over the years we have lost access to campsites that are critical to our business, most notably Pickerel Pond and Pulpit Rock. Since many of the sites are taken by reservation early in the season we find ourselves losing business every summer because we can't get campsites on short notice. I would recommend 2-3 campsites for use by guides and outfitters only and would be willing to lease and manage these on an annual basis.”

On another note, a person raised the issue that “foraging for downed firewood gradually desolates and makes barren the forest floor and lowers biodiversification around the campsites.”

Boating (Motorized and Non-motorized) [15.2]

Some comments were directed towards boating, both motorized and non-motorized. The most touched upon issues revolved around motorized boating, some fearing access would be restricted and others opposing motorized boats at Lake Umbagog NWR. Other letters mentioned user-conflict, impacts on wildlife, and a boat ramp.

Motorized watercraft advocates fear that their access is gradually being restricted, and further acquisitions by the Fish and Wildlife Service means more prohibitions and the eventual elimination of their use of Lake Umbagog. One letter summarizes others: “I am concerned though that your future plans are to eliminate recreational boats and activities in the future. For the past 30 years I have been visiting the Lake almost every weekend all year long and have witnessed your progress with the refuge and I agree on what your goals are but I do believe that motorized boats (recreational boats) and non-motorized boats can safely be present while the refuge goes about their business...I sincerely believe that the refuge should keep doing what they are doing but should not dominate over every day activities on the Lake. Fish and game are very nice to observe from a motorized recreational boat as well as canoes and kayaks. Motorized boats bring in economical income for the region whether it is from boat registrations, fuel they use, licenses for hunting or fishing or even accommodations at night.”

Other comments either oppose motorized watercraft use or want to see more restrictions on their use. This ranges from comments like, “I would also oppose motorized boating activities in all areas” to “motor boat speeds should be controlled.” More specifically, one person

wrote that they “would like to see limits placed on the use of motorized water craft, as the wake from some larger/faster boats made canoeing potentially dangerous and in my opinion spoiled the tranquil nature of the lake.” One comment suggested that “in order to minimize user-conflicts and water quality, air, and noise pollution, and also to minimize the introduction and spread of invasive exotic aquatic plant species into Lake Umbagog and its tributaries, we recommend that any new shoreline access sites be limited to non-motorized boats.” Another person added that “there should be some control or inspection of water crafts for evasive plants and other organisms that may invade the water.”

Another topic related to boating was the impact a boat ramp could have on Lake Umbagog NWR, which is also mentioned earlier in this document within Building and Facilities. One commenter wrote that “limiting boat size and motor size to 25 horse power and prohibiting jet skis and jet boats from launching” would suffice, adding, “We realize that the State of Maine controls the water but the Refuge's control of the boat ramp will also make a vast difference.” In a more general statement, one commenter stated “that new boat ramps should be limited to non-power watercraft.” One commenter states: “The CCP notes that some conflict has occurred between motorized and non-motorized boaters. The CCP should identify how to ensure multiple uses are accommodated without impinging on the experience these recreationists come to Lake Umbagog NWR to enjoy. AMC urges the USFWS to spend the necessary time and effort to mitigate these conflicts, and we stand ready to assist in any way we can.”

Snowmobiling [15.3]

Comments regarding snowmobiling were received. One set of respondents advocate the continued use of snowmobile trails, and the expansion of the trail system. Others believe that snowmobiles are detrimental to wildlife and incompatible with a National Wildlife Refuge.

The letters in favor of recreational snowmobiling on the Refuge tended to voice specific, localized concerns. One letter elaborates the concerns of the snowmobiling community: “Under all three potential plans put forth by the Wildlife Refuge, we are guaranteed access to existing snowmobile trails on Refuge property. We are concerned by this statement for a number of reasons, but mainly because these plans also call for more property attainment by the Refuge. The following is a list of our wants and concerns and the reasons for them: The State Line Snowmobile Club wants the ability to maintain, improve, and move trails as we see necessary for the benefit of the trail system, club, and community at large. The State Line Snowmobile Club wants the ability to build new trails as we see necessary for the benefit of the trail system, club, and community at large. The State Line Snowmobile Club wants the ability to use equipment as necessary to maintain, improve, move & build trails, including but not limited to the following types of equipment: groomers, chainsaws, bulldozers, ATVs, excavators, brush trimmers, and pickup trucks. The State Line Snowmobile Club wants to maintain and build upon the same permissions (for access, maintenance & trail building) that we currently have from both private and company landowners in the area. These issues and wants are important to our town and our snowmobile club. We are a small club, which has worked hard to build the trail system that we currently have, we are just starting out, and are ever hoping to improve. In order to establish a positive trail system, not just in the town of Upton, but in the area (including Grafton Township), it is sometimes necessary to move and make new trails for connectors between trail systems, to improve trails, or due to local

logging operations. No matter what the future of the Refuge incurs, we would like to continue building on this system. Snowmobiling is a long-loved and time-honored tradition in this area, which brings tourism and money to our local businesses. This community (which thrives on seasonal recreation such as snowmobiling) and our club don't want to lose the trail system and area commerce - which we have worked so hard to establish - because the National Wildlife Refuge plans to buy land to conserve and potentially keep us from using that land in a manner which is beneficial to the snowmobile club, and therefore beneficial to tourism and the community at large."

Another commenter added, "The activity of snowmobiling is expanding in the area, drawing more of those visitors that the Refuge forecasts with the acquisition of more land. The economic analysis (Appendix G, pp. G-13 and G-22) forecasts an increase in total snowmobiling visits from 20,000 in Alternative A to 35,000 in Alternative B. Where are you going to put all those snowmobiles? More, newer trails will prevent over-use of the existing ones, and encourage riders to stay on the trails, which are fairly well managed by the snowmobile associations. Another opportunity for a public/private partnership." An additional concern was expressed that the Refuge would continue to allow use on designated trails, but "it doesn't make any mention of the Maine counterpart (of NHDRED), and in my interpretation this means that as land is acquired, we will not be allowed there...If I am interpreting this right, it means that we can snowmobile on the present trail that are now in the 20,000 acres that the refuge has, and when they purchase additional lands we will not be allowed there. I would hope that this would be reconsidered."

There was also a concern about local property owners' access: "Restrictions on snowmobiling? How will local property owners and their visitors get to their camps? They won't be able to if the Lake and logging roads are shut off to them."

On the other hand, many letters were received from people who perceive that a National Wildlife Refuge is incompatible with snowmobiles. People wrote things like "I also believe it is important that the Refuge is managed principally for wildlife. Consequently, it is inappropriate for snowmobiling...to occur on the Refuge. Both of these activities are incompatible with the purposes and vision for the Refuge and, therefore, should not be allowed on the Refuge. None of the Alternatives outlined in the CCP fully consider the impacts of snowmobiling...on the resources of the Refuge; this should be amended in the final CCP." Some people addressed more specific concerns regarding snowmobiles. One person wrote, "Snowmobiling places special stress on wildlife already strained by winter," and another wrote, "snowmobiling is noisy, polluting, and dangerous for both wildlife and humans." A handful of people added that "encouraging snowmobiling runs counter to efforts to encourage less use of fossil fuels and less pollution of the atmosphere." One commenter voiced more detailed issues with the CCP: "the FWS has a mandate to conserve all fish, wildlife and plants on the refuge... Critical to the process is the Service's responsibility to correlate the public uses on the Refuge with their impacts on the Refuge's wildlife species. In support of the conservation mission of the Refuge System, the CCP should include a method to inventory the impact of human activities on species populations. Page C-106 states 'The refuge does not monitor snowmobile use, and its current levels are unknown. Grey (2005) estimates that as many as 22,000+ snowmobiles may visit the area around Errol each year. It is likely that a high percentage of those also visit the refuge.' The final CCP should include data specific to Umbagog snowmobile use and its impacts... Rather than perpetuate this

incompatible and inappropriate use- snowmobiling, the Fish and Wildlife Service should immediately initiate a gradual but complete phase out of snowmobiles from the refuge.”

A few people stated positions of compromise: “Snowmobiles are currently an important factor in the northern economy so they must be accommodated to a satisfactory level in regard to getting to/from destinations beyond the refuge but this should be done with a minimum of travel on refuge lands – hopefully skirting along the boundaries where possible.” Another person wrote, “I would prefer that snowmobile access be limited... ideally, I think it should be eliminated from a wildlife management area... Sequestering motorized access to certain areas (lake surface only) might be an acceptable alternative.”

ORV Use [15.4]

Few comments received addressed ORV use at the Lake Umbagog National Wildlife Refuge. Most of the comments addressing ORVs did not consider ORVs “to be consistent with Refuge goals” and did not “support their use within the refuge.” Somebody elaborated, “the Refuge should be managed primarily for the preservation of wildlife habitat, and thusly would be incompatible with the uses of ...ATV trails.”

On the other hand, a few people voiced some concern with closing four-wheel-drive roads. One commenter stated that “some four-wheel-drive roads need to be left in place,” and another added, “I would be in favor of Lake Umbagog recreation area if it includes... four wheeling.”

Hiking [15.5]

Respondents also addressed hiking. One stated simply, “quiet areas for non-motorized use need to be part of the recreational plan.” Someone else went into greater detail: “With regard to the hiking trail difference between Alternatives B and C, I tend to doubt that there will be heavy pedestrian use of the area, as people from the large population centers to the south would have to pass by the White Mountain National Forest with its many hiking opportunities, to reach the refuge. As a consequence I expect the hiking trails would not lead to significant disturbance, and would be appropriate to Alternative C. In summary, the overriding consideration, in all cases, should be that recreation by humans be secondary to the survival needs of wildlife populations.”

Uses Determined Inappropriate [15.6]

All of the comments directed towards Uses Deemed Inappropriate expressed opposition to the FWS’s classification of certain activities as inappropriate. Non-motorized uses and berry harvesting were commented on most often. For the most part, they are discussed in their respective categories. Some non-motorized recreation did not receive sufficient responses to categorize the activity separately because non-motorized activities were often grouped together. The messages from the public were consistently opposed to banning most non-motorized activities on Lake Umbagog NWR and any future expansion areas. People referred to biking, cross-country skiing, geocaching, horseback riding, dog mushing, dog walking, berry harvesting, mushroom picking, and remote camping. As one person wrote: “Given that non-motorized recreation is less disturbing to wildlife, it should be encouraged, rather than discouraged.”

One statement captured the essence of many: “There are over 30 popular forest- and water-based recreation activities that are listed in the NH Scorp that are prohibited in the refuge, and if the refuge expands will dramatically reduce tourism and recreation participation in the local economy and the North Country.” Not all 30 activities referred to are mentioned in other letters, but many are. Most of the letters express disappointment, even mistrust, with the FWS concerning these activities. For example one person wrote, “In 1991 or 1992 at a public meeting in Errol, NH about the refuge I asked the question ‘Will the refuge continue to allow traditional uses and public access for hunting, fishing, camping, and guides currently using the area?’ I was told yes. The current plan has a lot of no's: no dog mushing, no pets at remote sites, No firewood gathering at remote sites, no berry picking where people have picked for generations, no camping at Pulpit Rock, Pickerel Pond, North 1 and 2 (these sites are or are planned to be closed). . . All of the examples mentioned above are traditional uses pre-dating the establishment of the refuge. In a survey conducted by refuge staff with stakeholders before the CCP came out the question relating to the public's trust of refuge management received a rating of just over 50%. If you asked the same question today (after release of the CCP) to the same stakeholders it would be significantly less. In 1992 I was in support of creating the refuge. I still want to be a supporter of the refuge; but I cannot if the refuge's policies threaten the way I make my living. If you want the local public to support expansion of the refuge (Alternative B or C) you have to allow traditional uses or at least make a very strong case for any new restrictive policies put in place.”

Another commenter added, “Sled dog mushing, horseback riding, mountain biking, and geocaching are denied appropriateness by the refuge manager. He finds that each use is ‘consistent with...service policies’, is ‘consistent with public safety,’ is ‘manageable within available budget and staff,’ is ‘manageable in the future within existing resources,’ can ‘be accommodated without impairing existing wildlife-dependent recreational uses or reducing the potential to provide quality...compatible, wildlife-dependent recreation into the future,’ etc., but none is ‘consistent with goals and objectives in an approved management plan or other document.’ There is no explanation of what goal or objective these uses might be inconsistent with, and in fact there is ample evidence that mushing and horseback riding are historic uses long predating the existence of this refuge. Mountain biking in the area is a more recent recreational activity, but still predates the refuge founding. Geocaching is a very recent invention based on the popularity of GPS positioning instruments.”

Horseback Riding [15.6b]

A few comments were directed specifically at the activity of horseback riding. They argued for being allowed to ride horses on Lake Umbagog NWR, some citing the historical precedence that horseback riding at Lake Umbagog predates the National Wildlife Refuge. One person wrote: “A few months ago it was brought to my attention that horses were NOT APPROPRIATE for the National Wildlife Refuge. When I brought this up to Mr. Paul Casey one night at a public meeting in Newry, ME, he told me that the refuge didn't know that there would be a need for it and that he didn't know that there were horses in the area. I did not believe him for there are about four horses in the town of Errol and one in the town of Upton (that ones mine). I told Mr. Casey that we all use the land, and the worse thing that our horses can do is fertilize the land and help plant life grow. We have filled out the forms, maps, and gone to all kinds of meetings. It is the same thing over and over again, it is all right for campers, hikers, snowmobilers, fisherman, boater and everyone else to the refuge, but not

horses. I do not understand this kind of thinking at all. Horses have been around for centuries and have more right to be in the woods with their owners than anything else.” Another elaborated, “There have been some comments about restricting sled dogging and horseback riding within the refuge. Now I went back, this is a map from 1964. Actually, it shows a lot of the roads, and it shows up to Brown Company Camp #2, and then it shows hiking trails that existed. And one of the things that it says on the unimproved roads, is that they are ‘designed for foot, jeep and horse travel.’ Now when my great grandfather came up here, he took the train to Berlin, I believe, and maybe it was Milan, and went by horse and buggy up to our camp. The operative word being horse. And when we logged up here years ago, we used horses to get the logs out of the woods. So, I think horseback riding could be seen to be an historic use, and therefore compatible, within the refuge. I’m guessing I’m going to be able to find something on sled dogging somewhere; I just didn’t have time to look. So, I would say that a working group that included some of us, from whichever side, might be helpful in this planning process.”

One person stated more of a historical reason: “I think the founder of the refuges in all of the United States, as probably most of you know was Theodore Roosevelt. Back in 1898, July 1, 1898, on the San Juan Hill in Cuba, he presented a charge on horseback, I might add, and later received posthumously the Medal of Honor through President Clinton and it was decorated to his great grandson Tweed Roosevelt. So, I think that’s a good reason why we ought to allow horseback riding, as well as the fact that horses don’t leave any more of a mess, or cause any more damage than our moose do.” Another person cites that they “have no safe place to ride. This is my love, it’s my sport. Just like snow machining, and hunting and fishing.”

Berry Harvesting [15.6c]

The people who commented on harvesting berries opposed the restrictions. The general feeling people expressed can be summarized by the following comment: “In the overall scope of the proposed plan the issue of harvesting wild blueberries and other wild produce in the refuge is perhaps relatively unimportant. However, the seemingly unreasonable and arbitrary restrictions proposed in the draft plan have lead to considerable negative discussion in the local area. These restrictions are used as examples of the perceived extreme controlling and arbitrary nature of the Service. Thus, I feel these restrictions should be removed from the plan. There is question as to what sound scientific information was used to establish these restrictions. The reality of the situation appears to be that in years of good berry production a few people will harvest a quantity of berries. However, in these years there is still enough production so wildlife also has all it wants to eat. In years of limited or poor production very few people are willing to invest the time needed to harvest berries. Thus, wildlife suffers very little, if at all, due to human harvesting.”

Others cite historical and economic reasons as to why berry harvesting should be allowed. One person wrote: “My husband’s family has been picking berries for over 100 years. Those pies are for sale in local stores and support the community, as well as the tourist industry.” Another added: “Having picked blueberries in the area for over 45 years and knowing quite well how tedious and time consuming it is to fill even a quart container, I find the term ‘harvesting’ a bit amusing. I have absolutely no science or biology background, but having observed both productive and unproductive berry years, I have never noticed any decline in the amount of wildlife, which leads me to question if in fact, any negative impact exists. I

also believe that the Service's perception by the few locals who pick from the easily accessible areas on the side of the road would be vastly improved should the restriction go away."

Dog Mushing [15.6d]

The dog mushing comments were primarily covered under Uses Determined Inappropriate. Most letters written concerning dog mushing were grouped with other non-motorized uses and argued with prohibitions of the activity on Lake Umbagog NWR. There were a couple of letters specifically addressing dog mushing. One person commented that "the Lake Umbagog National Wildlife Refuge forms a vital area for mushing allowing key access points and routes." Another was concerned "that the Draft CCP prohibits dog mushing. While we understand that there may be times and specific locations that this activity may be incompatible with wildlife management, mushing is a traditional transportation and recreation activity, and should be allowed in the Lake Umbagog NWR. In addition, a number of local guides and businesses offer this activity, and need places to go that will offer clients backcountry experiences. We ask that this provision of the Draft CCP be changed to allow mushing."

Other Non-motorized Recreation [15.7]

The comments coded to other non-motorized recreation were discussed in Other Public Uses, Remote Camping, Boating, Hiking, and under Uses Determined Inappropriate. The public was upset that any non-motorized recreation was determined inappropriate. The exceptions to this are hunting and fishing, which had both support and opposition.

Appendices [16.0]

Comments discussing the Appendices were limited, and mostly technical. One example is, "I thought you'd like to know that my review of species tables in Appendix B resulted in several species of 'Special Concern' that were not identified as such. . .Mammals List – bobcat and hoary bat. . . Bird list – American pipit, red-shouldered hawk, rusty blackbird, whip-poor-will. . P. B-9 (Mammals List) does not identify 'deer' with an 'x' under the column 'NH Wildlife Action Plan' similar to bear and moose." A second example is, "On page C-68 of Appendix C, Compatibility Determination - Furbearer management the US F&W Service states as fact the false public relations propaganda that the BMPs for Trapping of IAFWA 'improves the welfare of animals in trapping.'"

Appendix A

Coding Structure and Demographic Codes

Header Information

Analysts will identify organization type, user type, number of signatures, response type, and delivery type on all letters.

Organization Types

The organization type code identifies a specific type of organization, association, government agency, elected official, or individual.

Government Agencies and Elected Officials

- F** Federal Agency
- N** International Government/International Government Association
- S** State Government Agency/Elected Official/Association
- C** County Government Agency/Elected Official /Association
- T** Town/City Government Agency/Elected Official/Association
- Q** Tribal Government/Elected Official/Tribal Member/Association
- E** Government Employees Organizations/Unions
- FW** Fish Wildlife Service Employee
- XX** Regional/other governmental agency (multi-jurisdictional)

Business and Industry

- A** Agriculture Industry or Associations (Farm Bureaus, Animal Feeding)
- B** Business (my/our, Chamber of Commerce)
- G** Range/Grazing Orgs and Permittees
- HT** Hunting/trapping Industry or Org
- M** Mining Industry/Assn (locatable)
- O** Energy Industry (Oil, Gas, Coal, Pipeline)
- U** Utility Group or Org (water, electrical, gas)
- L** Timber or Wood Products Industry/Assn

Other Organizations

- AD** Academic
- AR** Animal Rights
- CH** Church/Religious Groups
- D** Placed Based Groups (Multi-issue, focused on a specific region—i.e., QLG)
- H** Consultants/legal representatives
- J** Civic Organizations (Kiwanis, Elks, Community Councils)
- K** Special Use Permittees (Outfitters, Concessions, Ski Areas)
- P** Preservation/Conservation Organization

PA	Professional Association/Society
QQ	Tribal Non-Governmental Organization/Member
RB	Mechanized Recreation (bicycling)
RC	Recreational/Conservation (Trout Unlimited, Elk Foundation, Ducks Unlimited)
RM	Recreational - Motorized
RN	Recreational - Non-Motorized (hiking, biking, horseback riding)
SC	All Schools
SP	Sportsmen Clubs (Hunting, fishing, etc.)
X	Conservation Districts
Y	Other (Organization with an indecipherable focus—i.e., Ice Cream Socialist Party)
Z	Multiple Use/Wise Use

Unaffiliated

I Unaffiliated Individual or Unidentifiable Respondent

Number of Signatures

Each individual name associated is counted as one signature. Mr. and Mrs. X are counted as two signatures.

Response Type

The Response Type identifies the specific format of correspondence.

- Letter
- Form or Letter Generator
- Transcript (dictated Audio, Video, Telephone response)

Delivery Types and Descriptions

The Delivery Type identifies the method of delivery for the correspondence.

- Email and Mail
- Multiple (other than Email and Mail)
- Email
- Fax
- Hand-delivered/oral testimony (personally delivered)
- Mail or commercial carrier (includes video, audio, letter format)
- Telephone
- Unknown

User Type (UT)

The User Type identifies the purpose for which an individual, organization, or agency uses public lands/refuge. The commenter had to identify themselves as a categorized user type to be counted as such.

A	Area Residents
B	Businesses and Services
D	Dog Walkers
E	Environmental Educational
K	Bikers
F	Anglers
H	Hikers
P	Photographers
W	Non-motorized Recreation
M	Motorized Recreation
S	Horseback Riding
T	Hunters
TR	Trappers
X	Non-identifiable

Early Attention (IA)

Early Attention codes are applied only to those documents requiring an early response from the ID team. The Early Attention codes are listed in order of priority. If more than one code applies to a single document, the code with the highest priority is attached.

- 1** **Threat of harm** – Any response that threatens physical harm to administration, agency, or project personnel.
- 2** **Notice of appeal or litigation** – Any response that describes the respondents' intent to appeal an action or bring legal suit against the agency.
- 3** **Freedom of Information Act (FOIA) requests** – Any response that officially requests information and documentation under the FOIA.
- 4** **Provides proposals for new alternatives** – Any response that suggests a new alternative to the proposed action. These do not include critiques of alternatives or partial changes of existing alternatives.
- 5** **Requires detailed review** – Any response that requires detailed review. These responses may include detailed scientific or technical analysis, or significant enclosures.
- 5A** **Provides extensive technical edits** – includes extensive use of lined out text, suggestions to delete text, and/or replace text.
- 5M** **Provides maps** – Any response that includes map enclosures.

- 6 **Government entities** – Any response from an elected official, writing in his/her official capacity, representing a Federal, State, county, or municipal government. Also includes official correspondence from any government agency.
- 6A **Requests for cooperating agency status from a government entity.**
- 7 **Public hearing** – Any response that requests a public hearing.

Information Request

Information Request codes are applied only to those documents with specific requests for information pertaining to the proposal.

- A Mailing List Only/Nothing to Code
- B Request to be Removed from the Mailing List
- C Request for Copy of Federal Register Notice
- D General Request for Other Information
- E Request for Confirmation of Receipt of Letter

Comment Extension Request

When a respondent has a specific request for extending the comment period, it is identified.

Request to Extend the Comment Period

Lake Umbagog National Wildlife Refuge Draft CCP/EIS

The coding structure is a topical outline with alpha and numeric codes attached. It is a tool to identify public comments and sort them into recognizable topic categories. Once comments are assigned codes, they are then entered into a database from which they can be reported and sorted in any combination needed for analysis.

The coding structure is organized into required fields called subject and category codes. Subject codes are five-character alpha codes that represent broad themes associated with a project. Category codes are five-digit numeric codes that define specific subtopics within each subject code, and they are generally arranged from the general to specific with subcategories nested within categories.

PLANN (Subject Code) - Introduction - Chapter 1 and Coordination with Others - Chapter 5

1. Planning Process and Policy

- 1.1. Timeframes/Length of comment period
- 1.2. Public Involvement
- 1.3. Relationship to other planning processes
- 1.4. Statutory Authority (Acts, etc.)
- 1.5. Jurisdiction
- 1.6. Implementation (cost, resources)
- 1.7. Agency (General comments, including trust and integrity)
- 1.8. Coordination & Consultation (Interagency, Tribal, etc.)
- 1.9. Document (Clarity, Technical and Editorial)

2. Purpose and Need

- 2.1. Scope
- 2.2. Proposed Action
- 2.3. Refuge Vision and Goals (general comments)
- 2.4. Issues Identified during Public Scoping Process
- 2.5. Issues & Concerns Considered Outside the Scope
- 2.6. Monitoring and Evaluation
- 2.7. Cumulative Effects

ALTER – Alternatives – Chapter 2

3. Alternatives (general comments/votes)

- 3.1. Alternative A: Current Management
- 3.2. Alternative B: Service-preferred
- 3.3. Alternative C
- 3.4. Actions common to all alternatives
- 3.5. Actions common to Alts B & C only
- 3.6. Alternatives or actions considered, but eliminated
- 3.7. Range/Comparison of Alternatives
- 3.8. New Alternatives Proposed by Commenter

AFFEC - Affected Environment & Environmental Consequences – Chapters 3 & 4

4. Refuge Physical, Biological, and Socio-Economic Resources (general comments)

5. Refuge Administration (Name change comments)

- 5.1. Land Acquisition (Refuge expansion)
- 5.2. Buildings & Facilities
- 5.3. Staffing & Funding
- 5.4. Road System
- 5.5. Enforcement
- 5.6. Volunteer and “Friends” Group
- 5.7. Visitor Services

6. Social and Economic Values

- 6.1. General Management Direction
- 6.2. Local Economy
 - 6.2a Tourism
 - 6.2b Property Taxes
- 6.3. Social Values

7. Air Quality

- 7.1. General Management Direction

8. Hydrology and Water Quality

- 8.1. General Management Direction

9. Soils

- 9.1. General Management Direction

10. Open Water and Wetland Habitats & Species

- 10.1. General Management Direction
- 10.2. Open Water
 - 10.2a Invasive Species
- 10.3. Wetland Habitats (Fen & Flooded Meadow; Boreal Fen & Bog; Northern White Cedar; Scrub-Shrub Wetland)
- 10.4. Fish and Wildlife Species
 - 10.4a Common Loon
 - 10.4b Fish (Brook Trout, etc.)
- 10.5. Furbearer Management

11. Floodplain, Lakeshore, and Riparian Habitats & Species

- 11.1. General Management Direction
- 11.2. Habitats (Wooded Floodplain; Lakeshore Pine-Hemlock; Vernal Pools)
- 11.3. Wildlife Species
 - 11.3a Bald Eagle and Osprey
 - 11.3b Woodcock

12. Upland Forest Matrix Habitats & Species

- 12.1. General Management Direction (Logging comment)
- 12.2. Habitats (Spruce-Fir; Mixed Woods; Northern Hardwoods)
- 12.3. Wildlife Species – Mammals
 - 12.3a Lynx
- 12.4. Wildlife Species - Avian

13. Cultural and Historic Resources

- 13.1. General Management Direction

14. Priority Public Uses

- 14.1. General Management Direction
- 14.2. Visitor Safety

- 14.3. Access
- 14.4. Hunting
 - 14.4a Waterfowl
 - 14.4b Game or Other
- 14.5. Fishing
- 14.6. Wildlife Viewing/Photography
- 14.7. Interpretive and Environmental Education

15. Other Public Uses

- 15.1. Remote Camping
- 15.2. Boating (motorized and non-motorized)
- 15.3. Snowmobiling
- 15.4. ORV Use
- 15.5. Hiking
- 15.6. Uses determined inappropriate
 - 15.6a Biking
 - 15.6b Horseback Riding
 - 15.6c Berry Harvesting
 - 15.6d Dog Mushing
- 15.7. Other non-motorized recreation

16. Appendices

17. Comments Considered Out of Scope

Appendix B

Demographics

Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database can be used to isolate specific combinations of information about public comment. For example, a report can include public comment only from people in Massachusetts or a report can identify specific types of land users such as recreational groups, agricultural organizations, or businesses. Demographic coding allows managers to focus on specific areas of concern linked to respondent categories, geographic areas, and response types.

Although demographic information is captured and tracked, it is important to note that the consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the analysis team attempts to capture all relevant public concerns in the analysis process. Recreation Solutions processed 14,269 responses representing 14,413 signatures, for the Draft CCP/EIS.

In the tables displayed below, please note that demographic figures are given for number of responses, respondents, and signatures. For the purposes of this analysis, the following definitions apply: “response” refers to a discrete piece of correspondence; “respondent” refers to each individual or organization to whom a mail identification number is assigned (e.g., a single response may represent several organizations without one primary author); and “signature” simply refers to each individual who adds his or her name to a response, endorsing the view of the primary respondent(s).

Geographic Representation

Geographic representation is tracked for each response during the course of content analysis. Letters and emails were received from 50 of the United States, the District of Columbia, Virgin Islands, and eight foreign countries. The response format did not reveal complete geographic origin for 478 respondents.

Table B1 - Geographic Representation of Respondents by Country and State

Country	State	Number of Respondents	Number of Signatures
Canada		27	27
India		1	1
New Zealand		2	2
Great Britain		1	1
Mexico		15	15

Country	State	Number of Respondents	Number of Signatures
Romania		1	1
Puerto Rico		7	8
Brazil		2	2
United States	Alabama	62	62
	Alaska	32	32
	Arizona	343	345
	Arkansas	50	51
	California	2,468	2,490
	Colorado	428	429
	Connecticut	193	195
	Delaware	35	35
	District of Columbia	29	30
	Florida	774	777
	Georgia	218	222
	Hawaii	65	67
	Idaho	42	42
	Illinois	566	572
	Indiana	151	153
	Iowa	77	79
	Kansas	66	66
	Kentucky	74	75
	Louisiana	58	58
	Maine	242	249
	Maryland	238	239
	Massachusetts	575	581
	Michigan	363	367
	Minnesota	246	250
	Mississippi	28	28
	Missouri	168	168
	Montana	48	48
	Nebraska	52	53
	Nevada	84	86
	New Hampshire	285	301
	New Jersey	474	480

Country	State	Number of Respondents	Number of Signatures
	New Mexico	150	154
	New York	1123	1129
	North Carolina	301	303
	North Dakota	8	8
	Ohio	412	418
	Oklahoma	47	47
	Oregon	395	398
	Pennsylvania	587	591
	Rhode Island	53	53
	South Carolina	70	71
	South Dakota	19	20
	Tennessee	142	146
	Texas	606	609
	Utah	74	74
	Vermont	84	85
	Virgin Islands	1	1
	Virginia	325	333
	Washington	535	541
	West Virginia	39	39
	Wisconsin	206	207
	Wyoming	21	21
Unidentified		481	478
	Total	14,269	14,413

Organizational Affiliation

Responses were received from various organizations and unaffiliated individuals. Respondents include conservation organizations, wood products associations, as well as unaffiliated individuals and others. Organization types were tracked for each response.

Table B2 - Number of Respondents/Signatures by Organizational Affiliation

Organization Field	Organization Type	Number of Respondents	Number of Signatures
AD	Academic	1	1
AR	Animal Rights	6	7
B	Business	2	3
CH	Church/Religious Group	1	1
H	Consultants/Legal Representatives	1	1
I	Unaffiliated Individual or Unidentifiable Respondent	14,209	14,350
J	Civic Organization	1	1
K	Special Use Permittees (Outfitters)	1	1
L	Timber/Wood Products Industry or Association	4	4
O	Energy Industry	1	1
P	Preservation/Conservation Organization	12	13
RC	Recreational – Conservation Organization	2	2
RM	Recreational - Motorized	2	2
RN	Recreational – Non-motorized/Non-mechanized	4	4
S	State Government Agency	8	8
SP	Sportsmen Club (Hunting, fishing, etc.)	12	12
T	Town/City Government Agency/Elected Official	1	1
XX	Regional/Other Governmental Agency	1	1
Total		14,269	14,413

Response Type

Response types were tracked for each response received on the project. Responses were received as letters, forms, and public meeting transcripts.

Table B3 - Number of Responses/Signatures by Response Type

Response Type	Number of Responses	Number of Signatures
Letter	366	388
Form	13,848	13,970
Transcript	55	55
	14,269	14,413

Delivery Type

Delivery types were tracked for each response received on the project. Responses were received as email, fax, email and standard mail both, hand-delivered, standard mail, and oral testimony.

Table B4 - Number of Responses/Signatures by Delivery Type

Delivery Type	Number of Responses	Number of Signatures
Email	14,049	14,183
Fax	1	2
Hand-delivered	4	5
Mail or commercial carrier	150	157
Email and Mail Both	9	10
Oral Testimony	55	55
Multiple	1	1
Total	14,269	14,413

User Type

User type was tracked for each response received on the project. User types include area residents, business and services, environmental education, anglers, hikers, hunters, trapper, non-motorized recreation, and unidentifiable.

Table B5 - Number of Responses/Signatures by User Type

User Type Code	User Type	Number of Responses	Number of Signatures
A	Area Residents	125	135
B	Businesses and Services	3	4
E	Environmental Education	5	6
F	Anglers	1	1
H	Hikers	8	9
T	Hunters	13	13
TR	Trapper	1	1
W	Non-motorized Recreation	106	109
X	No Identifiable Type	14,007	14,135
Total		14,269	14,413

Appendix C

Early Attention Letters

The early attention designation is attached to public responses in the content analysis database for a variety of reasons. Our intent is to identify responses that fall into certain key categories, such as threats of litigation or comments from government officials, etc. These designations alert the project team members to public concerns or inquiries that may require an agency response or may necessitate detailed project team review for policy, political, or legal reasons.

The early attention designated responses are primarily intended for an internal audience. The categories of responses selected are designed to meet project team needs. This report is not intended to, nor should it be construed to, obviate the need to review all responses.

Recreation Solutions identified twelve early attention categories. The relevant designations are outlined below and followed by report tables.

- 1 **Threat of harm** – Any response that threatens physical harm to administration, agency, or project personnel.
- 2 **Notice of appeal or litigation** – Any response that describes the respondents' intent to appeal an action or bring legal suit against the agency.
- 3 **Freedom of Information Act (FOIA) requests** – Any response that officially requests information and documentation under the FOIA.
- 4 **Provides proposals for new alternatives** – Any response that suggests a new alternative to the proposed action. These do not include critiques of alternatives or partial changes of existing alternatives.
- 5 **Requires detailed review** – Any response that requires detailed review. These responses may include detailed scientific or technical analysis, or significant enclosures.
- 5A **Provides extensive technical edits** – includes extensive use of lined out text, suggestions to delete text, and/or replace text.
- 5M **Provides maps** – Any response that includes map enclosures.
- 6 **Government entities** – Any response from an elected official, writing in his/her official capacity, representing a Federal, State, county, or municipal government. Also includes official correspondence from any government agency.
- 6A **Request for cooperating agency status from a government entity.**
- 7 **Public hearing** – Any response that requests a public hearing.

Table C1 – (6) Government Entities

Letter Number	Name and Address	Remarks
3	Tim Beaucage Senior Planner State of Maine Department of Conservation, Maine Land Use Regulation Commission 22 State House Station Augusta, ME 04333-0022	Respondent thanked the FWS for the opportunity to review the document. Respondent states that the goals and implementation measures provided in the Draft CCP/EIS appear to be consistent with the Maine Land Use Regulation Commission's Comprehensive Land Use Plan. Various activities listed in the draft plan (boat launch, etc.) may require additional review and permits.
7	Raymond S. Burton Executive Councilor State of New Hampshire Executive Council State House Room 207 Concord, NH 03301	Respondent voices concern with restricting public use. "I urge that long time landowners around Lake Umbagog continue to use the lake and public property as they have for many years – with respect and dignity." Also, the respondent requests facility wired for interactive classroom presentations for students who might not otherwise visit the area.
42	John Gallus Senator, District One The Senate of the State of New Hampshire 107 North Main Street, Room 302 Concord, NH 03301-4951	Respondent supports Alternative A, as echoed by his constituents. The respondent cites opposition to expansion for the reason. Also attached a copy of a form letter.
99	Donald S. Clarke Acting Executive Director New Hampshire Fish and Game Department 11 Hazen Drive Concord, NH 03301	Respondent supports Alternative B, and the implementation of a Land Research Demonstration Program at the Refuge. The development and implementation of a furbearer management program and proposed land acquisition is also supported by the respondent.
101	Mark Stadler Director, Wildlife Division State of Maine Department of Inland Fisheries and Wildlife 284 State Street 41 State House Station Augusta, ME 04333-0041	Respondent supports Alternative B. Some reasons cited include land acquisition and management of habitat for American woodcock, monitoring of water levels and impacts of avian species, furbearer management plan, habitat to support bald eagle and osprey, and management of spruce/fir stands for wintering deer.
112	Philip Bryce Director State of New Hampshire, Department of Resources and Economic Development, Division of Forests and Lands pbryce@dred.state.nh.us	Respondent's comments focus on forest management and forest based economy. Respondent expressed concern with increasing federal ownership in the area, and requests that other ownership alternatives within the proposed Refuge expansion boundary be considered such as local, county or state fee and conservation easements.

Letter Number	Name and Address	Remarks
312	Pat MacQueen City Manger City of Berlin, NH pmacqueen@municipalresources.com	Respondent advised that the Mayor and Council of the City of Berlin voted to support Alternative A.

Table C2 – (5M) Requires Detailed Review – Respondents offer technical comments

Letter Number	Name and Address
91	Leanne Klyza Linck Eastern Forest Senior Associate The Wilderness Society PO Box 464 Hinesburg, VT 05461
98	Andrew Page, Campaign Manager, Hunting and Pierre Grzybowski, Deputy Campaign Manger, Fur The Humane Society of the United States 2100 L Street, NW Washington, DC 20037
118	F. Allen Wiley Vice President FPL Energy Maine Hydro LLC 160 Capitol Street, Suite 8 Augusta, ME 04330

Table C3 – (5M) Provides Maps

Letter Number	Name and Address	Remarks
10	Ned McSherry President, Northern Waters Outfitters	Respondent submitted a map with a proposed campsite location.

Table C4 – (2) Potential Litigation Threat

Letter Number	Name and Address	Remarks
925	Dick Artley 415 East North 2 nd Grangeville, ID 83530	“End your absurd consumptive uses (a.k.a. killing) and prolonged torture (a.k.a. trapping) at Lake Umbagog National Wildlife Refuge or your will next see my name on a document designated as ‘plaintiff.’”

Appendix D

Information Requests

Requests for additional information, excluding Freedom of Information Act requests, are presented in this appendix. Recreation Solutions identified five information request categories. The relevant designations are outlined below and followed by report tables. In addition, one request for extension of the comment period is displayed below.

- A** Mailing List Only/Nothing to Code
- B** Request to be Removed from the Mailing List
- C** Request for Copy of Federal Register Notice
- D** General Request for Other Information
- E** Request for Confirmation of Receipt of Letter

Table D1 – (D) General Requests for Information

Letter Number	Name and Address	Remarks
64	Maurice A. Cyr 565 Hurricane Rd. Keene, NH 03431	Requests a list of items the current refuge has done to maintain or assist the public in its use (construction on refuge on property - fences, pavement, foundations, parking lots)
117	Ovide M. Lamontagne, Esquire 111 Amherst St. Manchester, NH 03105	Requests a copy of the new Hunt Plan Package when it is available.
118	F. Allen Wiley Vice-President, FPL Energy 160 Capitol Street, Suite 8 Augusta, ME 04330	Requests documentation on past land acquisition funding and approval. See letter for details.
352	Suzanne Fournier 9 Woodward Dr. Milford NH, 03055-3122	Requests to read the minutes of the CORE team that worked on the Lake Umbagog NW Refuge plan, either all the minutes or those pertaining to furbearer management.
417	David Elvin Capitol Region Council of Governments delvin@crcog.org	Requests a copy of the Comprehensive Plan for the Conte Refuge. Also GIS files.

Table D2 – (E) Request for Confirmation of Receipt

Letter Number	Name and Address	Remarks
732	James Lukas 961 Ellington Circle Greenwood, IN 46143-8460 j93luk@localnet.com	Requests Conformation of Receipt of letter.

Table D3 – Request for Comment Period Extension

Letter Number	Name and Address	Remarks
107	Karen Brown, spoke at the Public Hearing in Errol, NH	Respondent requests extension of comment period, no specific length of time specified.

Appendix E

Organized Response Report

Organized response campaigns (forms) represent 97 percent (13,848 of 14,269) of the total responses received during the public comment period for the proposal.

Forms are defined as two or more responses, received separately, but containing nearly identical text. Once a form is identified, a “form master” is entered into the database with all of the content information. All responses with matching text are then linked to this master form within the database with a designated “form number.” If a response does not contain all of the text presented in a given form, it is entered as an individual letter. Responses including text in addition to the form text are considered “form plus” letters and treated like individual letters.

Table E1 – Description and Number of Signatures for Each Form

Number of Form	Number of Signatures	Description of Form
1	1,426	Respondents oppose the proposed furbearer management program.
2	12,405	Respondents support Alternative C because of the proposed land acquisition acreage.
3	3	Respondents oppose restrictions on snowmobiling and prefer Alternative A.
4	3	Respondents oppose restrictions, such as berry picking and dog-mushing and prefer Alternative A.
5	4	Respondents oppose restrictions on recreational access and prefer Alternative A.
6	9	Respondents oppose proposal to move the headquarters and create a new visitor center, due to the costs associated. Respondents prefer Alternative A.
7	5	Respondents oppose restrictions on recreational access and prefer Alternative A.
8	16	Respondents oppose restrictions on recreational access, unauthorized uses, and the proposed headquarters and visitor center. Respondents prefer Alternative A.
9	4	Respondents oppose restrictions on recreational access, berry picking, and horseback riding. Respondents prefer Alternative A.
10	9	Respondents oppose restrictions on recreational access, unauthorized uses, and the proposed headquarters and visitor center. Respondents prefer Alternative A.

Number of Form	Number of Signatures	Description of Form
11	11	Respondents oppose restrictions on recreational access and unauthorized uses, and the proposed headquarters, B pond boat ramp, land expansion and visitor center. Respondents prefer Alternative A.
12	75	Respondents support Alternatives B and C. Respondents support the proposed land acquisition and education opportunities, but encourage more non-motorized recreation.

Appendix F

List of Preparers

Recreation Solutions

Project Coordination

Dave Spildie, Project Leader

Content Analysts

Terry Carlson, Writer

Aaron Drendel, Writer/Analyst

Miles Friend, Writer/Analyst

Kristen Thrall, Writer/Analyst

Information Systems

Dan Gilfillan