

Appendix I



Public meeting
USFWS photo

Summary of Public Comments and Service Response

Draft Comprehensive Conservation Plan and Environmental Impact Statement for Petit Manan National Wildlife Refuge Complex, December 22, 2004

- Introduction
- Summary of Comments Received
- Service Responses to Comments

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Introduction

We published our Draft Comprehensive Conservation Plan (CCP) and Environmental Impact Statement (EIS) for the Petit Manan National Wildlife Refuge Complex and released it for 68 days of public review and public comment from April 30 to July 6, 2004.

This summary responds to those comments. After we had evaluated them, we modified alternative B, our preferred alternative in the EIS. Our modifications include additions, corrections, or clarifications of the preferred actions. Although none of those modifications warranted major revisions between draft and final plans, please note these four important changes in our final EIS.

1. We propose changing the name of the refuge complex to “Maine Coastal Islands National Wildlife Refuge” (see p. I-21). We will use this name in outreach and administration to refer to the five refuges collectively. It does not change the name or status of the individual refuge units.
2. We clarify the new hunting opportunity proposed on Petit Manan Point Division. Our proposal for deer hunting in the draft CCP/EIS did not stipulate which areas or which seasons would be open. We propose opening the deer hunt to (a) hunters with disabilities during the regular rifle season, and (b) hunters of all abilities during the regular muzzle-loader season. The hunting area will lie in the northern half of the division, above the entrance road (see p. I-5).
3. We propose changing the wilderness study area (WSA) boundaries to exclude all private lands and existing rights-of-way on Cross and Bois Bubert Islands, and the common boat landing and Lily Lake on Bois Bubert island. All WSA boundaries will be defined by the mean high water mark surrounding the islands. Appendix D, “Wilderness Inventory and Study” includes those changes.
4. We propose to exclude an 8-acre tract on Wood Island from our expansion proposal. The tract is owned by the Coast Guard and includes an historic lighthouse. The Coast Guard requested we exclude this tract, which is under a licensing agreement with the American Lighthouse Foundation for repair, maintenance, and historic preservation.

Our Regional Director will issue a Record of Decision (ROD), the final decision document in the planning process, after:

- Our Service Director has reviewed and approved our Land Protection Plan ; and,
- We have provided the final documents to interested or affected parties for a 30-day waiting period, which will start when we publish a notice in the “Federal Register” that we have prepared a ROD and final EIS.

Once our Regional Director has signed the ROD, the planning phase of the CCP process is complete, and its implementation phase begins.

Summary of Comments Received

We received 594 public responses in oral testimony at public hearings, in phone calls, or in written or electronic documents.

We held four formal public hearings.

- June 1, 2004, 7-9:00 p.m., Rockland Public Library, Rockland, ME
- June 2, 2004, 7-9:30 p.m., Milbridge Town Hall, Milbridge, ME
- June 8, 2004, 7-9:00 p.m., Pine Tree State Arboretum, Augusta, ME
- June 9, 2004, 7-9:00 p.m., Falmouth Public Library, Falmouth, ME

Eighty-five people attended the public hearings: 28 in Rockland; 35 in Milbridge; 9 in Augusta; and 13 in Falmouth. Thirty gave oral testimony: 12 in Rockland; 7 in Milbridge; 4 in Augusta; and 7 in Falmouth. Some submitted their comments in writing instead of giving oral testimony, while others did both. More comments arrived later by post or electronic mail.

We received four comments from federal or state agencies.

- U.S. Department of Homeland Security, U.S. Coast Guard
- U.S. Environmental Protection Agency
- National Park Service, Acadia National Park
- Maine Department of Inland Fisheries and Wildlife

We received 20 comments from local and national conservation organizations, associations, groups, or clubs.

- Conservation Law Foundation
- The Ocean Conservancy
- The Wilderness Society
- Maine Chapter of the Wildlife Society
- Friends of Maine Seabird Islands
- Friends of Seguin Island
- Friends of Sears Island
- Boothbay Region Land Trust
- Islesboro Islands Trust
- Vinalhaven Land Trust
- Maine Coast Heritage Trust
- Bagaduce Watershed Association
- Searsport Comprehensive Plan Committee
- The Maine Aquaculture Association
- Atlantic Salmon of Maine

- Home Inc.
- American Lighthouse Foundation
- Friends of Wood Island Lighthouse
- National Audubon Society
- Sierra Club of Maine

We received 543 responses from individuals.

- 492 electronic mailings
- 51 letters and phone calls

The following discussions summarize the issues raised during the public comment period and our responses to them. Several refer to the full-text version of our draft, and indicate how our proposed changes are reflected in this final CCP/EIS. If you would like to obtain a copy of either the draft or the final EIS, in full-text versions, they are available online at <http://library.fws.gov/ccps.htm>. You may also request them on CD-ROM or in print by contacting the refuge headquarters.

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I. Hunting

Comment. Some comments opposed any form of hunting on national wildlife refuges, and expressed concern that hunting is inconsistent with the very meaning of the phrase “refuge for wildlife.”

Response. The National Wildlife Refuge System Improvement Act of 1997 (Improvement Act) identifies hunting as one of six priority, wildlife-dependent public uses that are to receive enhanced consideration in refuge planning. The others are fishing, wildlife observation and photography, and environmental education and interpretation. Our mandate is to provide high-quality opportunities for these priority uses when they are compatible with respective refuge purposes, goals, and other management priorities. The Improvement Act did not establish a hierarchy among the six priority uses, but provides for the refuge managers to facilitate them when they are compatible and appropriate.

We have implemented a hunt program on the refuge during the past four years. We opened the Gouldsboro and Sawyers Marsh mainland divisions for hunting small and big game, migratory game birds, and waterfowl, and allowed hunting for white-tailed deer on Bois Bubert Island. We also opened 22 islands for hunting migratory waterfowl. The success of the hunt program, in combination with requests from the MDIFW, provided the basis for expanding the program. Appendix C includes our compatibility determination on the refuge hunt program.

II. Deer Hunting on the Petit Manan Point Division

Comment. This proposal generated the most comment. Some individuals and the MDIFW support hunting on the Petit Manan Point Division (the Point) and expanding what many consider a traditional activity in Maine. One individual commented that he had seen some overbrowsing by deer of Atlantic white cedar, and believes a hunt will reduce negative impacts on vegetation.

We received 52 comments from individuals who oppose deer hunting on the Point. Many of those do not oppose hunting per se, but rather, oppose hunting on the Point, especially if it is only for recreation. Some of those comments came from private property owners on the Point, or their relatives. We identify each of several reasons they cited for their opposition as separate comments below.

Response. We acknowledge the many thoughtful, heartfelt comments that oppose deer hunting on the Point.

After having carefully considered all public comments, and having taken into account our obligation to provide opportunities for this priority public use, where compatible, we have clarified our deer hunting proposal on the Point. We will allow (a) hunters with disabilities to hunt during the regular rifle season (firearms); and, (b) hunters of all abilities to hunt during the regular muzzleloader season. Both hunts will take place north of the entrance road, in the area often referred to as “the Birch Point Trail area.”

We will publish the details of both hunts within the 90 days following the approval of the final CCP. We anticipate restricting the hunters with disabilities to blinds constructed at strategic locations inside the hunt area. We will develop and post a well-defined area for the muzzle-loader hunt.

Comment. Several reviewers suggested there is no biological need to control deer on Petit Manan Point and, therefore, opening it to deer hunting is not warranted.

Response. Hunting is one method for managing deer populations, but it is also a legitimate and generally accepted recreational activity, and part of the priority public use mandate we mention above. That deer have overpopulated an area or have damaged resources is not the sole justification for a deer hunt on a national wildlife refuge. Here, for example, if the state or the refuge manager determine that a harvestable population lives in wildlife management district 27, the refuge manager can implement a deer hunting program after having determined its compatibility.

Comment. Several reviewers suggested that opening Petit Manan Point to deer hunting violates our original purchase and sales agreement with the Mague family.

Response. We cannot dispute that the Mague family may have held expectations about hunting. However, our thorough review of all the acquisition documents found no specific language that would restrict our ability to conduct hunting or other priority public uses on the Point.

Comment. Several reviewers suggested that opening Petit Manan Point to hunting will impact other priority public users.

Response. We recognize that hunting could impact or restrict other priority public uses on the Point during the hunting season. We will provide opportunities for the full range of priority public uses, and attempt to minimize any conflicts among them. Deer hunting will occur in late fall, when refuge visitation is significantly lower than during summer and early fall. We will exclude the southern part of the Point from the hunt area, thus allowing the Hollingsworth Memorial Trail area to remain open during the hunt. State of Maine regulations prohibit hunting on Sunday, so visitors will be able to access both the Birch Point Trail and the Hollingsworth Memorial Trail on that day each week.

Comment. Hunting will require additional law enforcement; and, it raises concerns about public safety, the increased potential for trespass and vandalism on adjacent private properties, and increased road damage.

Response. We agree that implementing a deer hunt will increase the need for law enforcement. Our preferred alternative proposes adding two refuge staff with law enforcement authority, and working with MDIFW and other Service offices to provide additional law enforcement support during the hunting season.

We believe that hunting on the Point can be conducted safely. Hunters with disabilities will hunt in designated locations. We will clearly post the boundaries of the area open to hunting, so that hunters and non-hunters alike are aware of that area. We will establish well-marked safety zones near residential and other high traffic areas, and will require hunters to adhere to all state safety regulations. The increased road use by hunters would not result in damage to the private section of the road, as all vehicles will be restricted to the refuge portion of the road, and designated parking areas will be available on the refuge for hunters.

We acknowledge that trespass and vandalism have occurred on the refuge and on private land on the Point. We will continue to work with our refuge neighbors on solutions to those problems. We will do our best to reduce or eliminate them on refuge lands, and will reassess or discontinue refuge management actions that contribute to problems on adjacent private land.

III. Furbearer Management

Comment. Some individuals opposed the furbearer trapping proposed in alternative C. One believes that killing wildlife by any means is inconsistent with the concept of a refuge. One individual and the MDIFW, who consider trapping a traditional recreational activity, recommended we allow the trapping of furbearers in our preferred alternative, under state and refuge regulations, on the Gouldsboro Bay, Sawyers Marsh, and Petit Manan Point mainland divisions, and on Cross and Bois Bubert islands.

Response. Our preferred alternative B did not propose a general furbearer-trapping season for several reasons: (a) the public did not express an interest in a furbearer trapping season before we released our draft; (b) it is not a priority public use; (c) it potentially conflicts with priority public uses; and, (d) no biological need mandates that we manage furbearer populations at this time.

Alternative C, objective 6.7, includes a general furbearer trapping season. Our staff now conducts or authorizes all furbearer management on the refuge in association with seabird restoration projects on offshore islands. We do not see a need at this time to open the refuge to a general trapping program. We will continue our evaluations and discussions with the MDIFW and, later, may consider opening some of the refuge. We will, of course, do another environmental analysis and ask for public review and comment on any future trapping proposal.

IV. Waterfowl Management

Comment. One reviewer commented that the CCP should emphasize a need for increased intertidal and coastal marsh protection to benefit waterfowl and other wetland-dependent species of concern.

Response. We agree that intertidal and coastal marsh habitats are significant resource areas. Goal 2 specifically identifies the need to maintain high quality wetland habitats on the refuge mainland coast, primarily to benefit migratory birds of high conservation priority, while also supporting other native, wetland-dependent species of concern. Objective 2.1 focuses specifically on the importance of maritime saltmarsh and estuaries and their value to shorebirds and black ducks. Our strategies for that objective indicate how we intend to monitor the habitat and survey the species during the migrating and breeding seasons.

Goal 4 of the plan outlines the need to protect high quality wetland habitats on coastal islands. Objective 4.1 specifically mentions protecting the coastal saltmarsh on Cross Island. That objective includes strategies to monitor threats to the habitat and conduct surveys to determine its use by species of conservation concern.

The refuge protects significant acreage in intertidal habitat. Objective 4.2 recognizes the significance of that habitat to shorebirds and waterfowl. We also recommend additional research on harvesting intertidal species such as rockweed, bloodworm, blue mussel, and periwinkle, to evaluate the impacts of human disturbance and the loss of forage to nesting and migratory birds of conservation concern. Because federal regulations prohibit the removal of any vegetation from a refuge, we do not allow rockweed harvesting.

We also propose further cooperative studies to evaluate the use of intertidal habitats by migratory birds and potential impacts on those habitats. Objectives 4.2, 4.4, and 4.5 further describe those studies. Finally, we propose to acquire additional coastal wetlands in section VIII, “Land Acquisition,” below.

Comment. One reviewer commented that the CCP should include more on waterfowl surveys and banding programs, as strategies under our biological objectives, for example.

Response. We have worked with biologists from Patuxent Wildlife Research Center to band waterfowl during fall migration on the freshwater impoundments on the Point and a freshwater pond on Bois Bubert Island. However, the low numbers of resident ducks, the arrival of migrating waterfowl late in September, and the difficulty in attracting them with bait due to their preference for stands of wild rice hampered the banding. Bois Bubert Island provides a freshwater resting area, but access depends on sea conditions, and extreme fluctuations in water level make maintaining traps a logistical challenge. Given those considerations, we intentionally did not include strategies for increased waterfowl banding and surveys, except those described below for common eider and wintering harlequin ducks.

Objective 5.8, “Common Eider,” outlines our involvement in cooperative research with the MDIFW and the U.S. Geological Survey in an extensive project for the banding of common eider. That project focuses on eider recruitment and survival rates in the Gulf of Maine. In the past three years, more than 5,000 eiders have been banded, the largest number of banded eiders in state history. That has helped us better understand their movements and annual mortality rates, and will aid us in making more informed management decisions in the future. We count the number of eider nests on refuge islands every five years, to monitor numbers of breeding birds.

We also have participated as observers in annual waterfowl aerial surveys to assess continental, state, and flyway population levels. Those surveys include breeding, fall, and mid-winter counts conducted by the Service. We also participate in winter harlequin duck studies in cooperation with MDIFW and Acadia National Park.

Comment. One reviewer suggested that the planning team should involve more wildlife professionals in preparing and implementing the plan.

Response. We highlight our existing professional partnerships throughout chapter 3, “Affected Environment.” We are fortunate to have many retired and active professionals in the area who have been a huge asset in planning and implementing current programs. Their assistance in performing botanical surveys, invertebrate inventories, including dragonfly and damselfly surveys, and extensive spider

surveys has expanded our information database. Those surveys have identified several rare species or species of special concern in Maine.

The spider surveys, in particular, have revealed several previously undescribed species, and have created several new records for the state. That would not have been possible if non-Service professionals had not taken a leading role. Many of our biological objectives come directly from existing state or federal species recovery plans, species assessments, or other regional conservation plans developed by wildlife professionals.

We also invited the involvement of Maine's professional wildlife community by contacting the Maine Chapter of The Wildlife Society, whose members include more than 120 wildlife professionals and other concerned individuals from government agencies, academic institutions, private firms, and non-governmental organizations.

In preparing this plan, we consulted with many professionals from state and federal agencies and the private sector (see chapters 5 and 6). We held numerous public forums throughout the planning process to reach as many people as possible. Chapter 5 describes that process, which dates back to 1995. As we move forward with implementing the plan and producing step-down plans, we will continue to seek new opportunities to draw upon the expertise of as many resource professionals as possible.

Comment. Two reviewers suggested we provide as much waterfowl hunting as possible.

Response. In 2001, we opened parts of the refuge to waterfowl hunting under state regulations for the first time since Service ownership began. Those areas include the Gouldsboro Bay and Sawyer's Marsh divisions and 22 refuge islands. The intertidal areas of all refuge properties are open to waterfowl hunting according to colonial ordinance. We developed the refuge Hunt Plan in coordination with MDIFW biologists. It recognizes the need to keep some areas closed to provide critical waterfowl feeding and resting areas, especially for American black ducks. As before, when we acquire new refuge properties, we will evaluate them for new waterfowl hunting areas.

V. Environmental Education

Comment. Comments enthusiastically supported the proposed Coastal Education Center, and also recommended specific locations. More than 38 individuals and organizations recommended Sears Island, now owned by the State of Maine, including the Friends of Sears Island, Maine Coast Heritage Trust, Bagaduce Watershed Association, Islesboro Islands Trust, Sierra Club, and Searsport Comprehensive Plan Committee.

Boothbay Region Land Trust also supports the development of a coastal education center, but suggested Boothbay as its location. The Friends of Maine Seabird Islands and the Audubon Seabird Restoration Program, fully support the concept, and recommend that one major criteria for selecting the site be its proximity to coastal islands.

Response. The level of interest in the project and the suggestions of specific properties for consideration are most encouraging. Once the CCP has received final approval, we will invite a team of interested partners to finalize site selection criteria designed to meet the vision and goals of the Coastal Education Center and our needs for a new refuge headquarters in the mid-coast area. Once we have defined those criteria, we will guide our evaluation of all potential properties by them, conduct an environmental analysis of the properties that qualify, and seek additional public input before our

final decision. For example, if the State of Maine invites us to consider Sears Island, and the island meets the criteria, we will fully analyze it, along with other, prospective locations.

Comment. The Acadia National Park (ANP) expressed an interest in establishing a formal partnership with us to engage in environmental education and training at their Schoodic Education and Research Center.

Response. We agree that a stronger partnership could benefit both agencies, and help advance the conservation and stewardship of coastal resources. We will pursue additional environmental education opportunities at ANP’s Schoodic facility. This fully complements our preferred alternative, which identifies the need to continue exploring partnership opportunities. We will continue to meet with ANP staff to identify ways to expand and formalize our partnership in environmental education, research, island stewardship, and law enforcement.

Comment. We received comments asking us to allow school groups access to Seal Island. The island is closed to general public access year-round because of safety concerns over unexploded ordnance.

Response. We still believe that non-essential access to Seal Island poses too great a public safety risk, and our preferred alternative will recommend that it stay closed. The following discussion provides a historical overview, summarizes the basis for our concerns, and indicates our past attempts to mitigate those concerns.

We acquired Seal Island from the U.S. Navy in 1972. Before that, the island had served as a practice bombing range from the early 1940s through 1966. In June 1966, a team from Brunswick Naval Air Station conducted a three-day disposal operation to begin the clearing of unexploded ordnance. In July 1978, a fire that burned on Seal Island for several days caused additional ordnance buried in the soil to explode. The intensity of those explosions forced the firefighters to abandon the island.

In February 1983, the Explosive Ordnance Disposal (EOD) team from Brunswick Naval Air Station attempted to clear unexploded ordnance from the island before a seasonal research crew from National Audubon arrived there to restore Atlantic puffin and tern colonies. That search found an intact 8-inch round and numerous bomb fragments, projectiles, rockets, and pyrotechnics. The team concluded that the rocky areas of Seal Island could be considered safe, but the grassy areas still may contain explosive hazards. The team also concluded that the only way to clear the island of all hazards would be to burn the grass off and remove the soil. The team returned to the island in April 1984, and concentrated on clearing pathways from the boat landing area to the research cabin and clearing the shore out to 50 feet.

In 1984, the Service and the National Audubon Society entered into a Cooperative Agreement to restore Atlantic puffins and terns on the island. From May through August each year, our researchers have monitored recovery and conducted other research on the island. However, they are essential personnel fulfilling a mission-critical activity.

Based on comments from researchers that indicated additional, intact ordnance, the Maine Department of Environmental Protection and the Maine State Police Bomb Squad searched the island in June 2001. That team discovered intact 5-inch Zuni rocket heads on exposed rock on the western part of the island and removed them, but did not search any additional areas.

A 2003 report by the U.S. Army Corps of Engineers (ACOE) provides a historical summary of activities on the former Seal Island Gunnery Range (Project Number D01ME003201), and indicates that a safety hazard remains. Despite our contacts with ACOE, Rock Island, we are unaware of any technology that is not prohibitive in cost or would not result in major impacts on nesting habitat.

Our goal is to provide the safest conditions for everyone entering Seal Island NWR. We will continue to investigate opportunities for removing the ordnance. We believe that cost-effective technology will be available one day to do so without damaging habitat.

Comment. Some individuals asked that we expand our environmental education to include programs on the seabird nesting islands during the nesting season, in areas where it could be accommodated without affecting nesting success. The reviewers cited as examples of successful programs the opportunities offered on Machias Seal Island (30 landings per day) by private tour companies, and on Stratton Island, which is run by the National Audubon Society.

Response. The refuge seabird islands are closed to all public use during the nesting season. Our staff supervise a few trips each year, typically for media outreach or for professional consultations that will directly benefit seabird restoration. On the other hand, we recognize what a unique experience it is, to be on a seabird island during the nesting season, and we fully appreciate the benefits that could derive from an educational program.

After carefully considering public comments, we agree to further evaluate opportunities to expand that unique activity on a limited number of refuge islands. We will establish guidance on visitation to nesting seabird islands in conjunction with the development of our Visitor Services Plan, now scheduled for completion within two years of CCP approval.

We will continue our involvement in the commercial boat tours that bring nearly 30,000 visitors each year to view seabirds from the water. Our preferred alternative proposes that we cooperate more closely with those tour operators to ensure that the information they share with their customers is accurate and includes a strong conservation message.

VI. Public Use Infrastructure on Petit Manan Point Division

Comment. We received comments asking that we move two interpretive displays on the John Hollingsworth Memorial Trail on Petit Manan Point because they were located too close to the water and detracted from the natural landscape.

Response. We agree with that suggestion. In 2005, we will move the displays to higher ground, away from the water's edge.

Comment. Some reviewers, including adjacent landowners who generally supported increased barrier-free access, expressed their concern about a proposal to add a new parking area and barrier-free viewing platform at the end of the Service-owned portion of the Point access road. Some of those landowners expressed the specific concern that these and other proposals for the Point in our preferred alternative would result in public trespass onto their private property from refuge lands.

Response. We discussed the proposed parking area and viewing platform at the end of the refuge road during planning team meetings but, ultimately, decided not to recommend them. Unfortunately, those developments inadvertently remained highlighted on maps we presented at our public meetings and published in our draft (map 2-7). We have corrected that error in this final EIS and CCP.

However, we do intend to explore opportunities for constructing one barrier-free trail and observation platform at the Corea Heath Division, once we have acquired it from the U.S. Navy. The trail would be approximately 1,000 feet long, on an existing, raised road (see map 2-5). A trail and platform are also proposed on both the Gouldsboro Bay (map 2-6) and Sawyers Marsh (map 2-8) Divisions.

As for the concern about refuge visitors who trespass onto private land on the Point, we posted a sign, created a turn-around area, and installed a gate to help curtail that problem for refuge neighbors. We will continue to explore new solutions with those private landowners.

VII. Wilderness

Comment. Many comments from individuals and organizations supported the wilderness proposal in our preferred alternative B.

Response. We appreciate the public support for our proposal to recommend eight Wilderness Study Areas (WSAs) for inclusion in the National Wilderness Preservation System (NWPS). If our Director approves the recommendation in the final CCP, we will forward our wilderness recommendations in a wilderness study report from the Director, through the Secretary of the Interior and the President, to Congress. Congress has reserved the authority to make final decisions on designating national wilderness. The comments we received on this proposal are part of the administrative record of this plan, and will be shared in the wilderness study report.

Comment. We heard from private landowners on Bois Bubert Island who expressed concern with how wilderness designation would impact their right to access and use their lands.

Response. We reviewed Service jurisdiction in the area between mean high and mean low water and private property holdings and rights-of-way on Bois Bubert and Cross islands. That review resulted in several changes in our preferred alternative.

We will change the eight WSA boundaries from mean low water to mean high water, to exclude the area commonly referred to as the “intertidal zone.” Because Service authority in the intertidal zone is limited, that boundary change will remove any potential conflicts with activities that are not under full Service jurisdiction or management control.

We will also modify the WSA boundary on Bois Bubert Island to exclude the existing rights-of-way, common boat landing, private inholdings, and Lily Pond. Although Lily Pond lies within the refuge boundary, private property owners on the island hold a reserved right to access and use that pond. The WSA boundary on Cross Island will also exclude private inholdings.

The new maps in appendix D, “Wilderness Review,” depict those boundary changes. The proposal for wilderness in our final CCP will recommend that, if the Service acquires those private lands or reserved rights, we incorporate by an administrative action each of those exclusions into its respective WSA or designated wilderness area.

Comment. The Ocean Conservancy urged us to further examine the impacts of activities in adjacent waters on wilderness character and the natural values required by the Wilderness Act.

Response. Our extensive wilderness review (appendix D) considered all refuge land owned in fee. We determined that eight WSAs warranted consideration for inclusion within the NWPS. We evaluated the potential impacts on wilderness values arising from existing or proposed activities on the lands and waters around those areas. We eliminated all of the mainland units and 24 islands from our wilderness proposal because of existing developments or because we needed to retain full management flexibility over the next 15 years.

However, it is important to note that Congress clarified in House Report 95–540 on the Endangered American Wilderness Act of 1978 that we should not disqualify areas from further wilderness study solely on the basis of the “sights and sounds of civilization” located outside those areas. In that act,

Congress also designates a number of wilderness areas near major cities, which illustrates the clarification in its report. Although we agree that future off-site activities potentially could affect WSA viewsheds and impact their naturalness and solitude, the Service has no authority to regulate those activities. We did not use them as a reason for eliminating refuge lands from WSA consideration.

Comment. The Maine Aquaculture Association (MAA) expressed concern that our proposal contained “no analysis of the impacts of wilderness designation on potential aquaculture development.”

Response. The Service has no jurisdiction to regulate activities off refuge lands, even if the refuge lands are WSAs or designated wilderness. Chapter 1 summarizes the aquaculture lease process and the regulatory authority that lies with the ACOE and State of Maine.

We conducted our wilderness review with the full recognition of the commercial and recreational activities that now take place in waters immediately around the WSAs. Of the WSA islands in our proposal, only Cross Island has an existing aquaculture facility nearby. We determined that its proximity did not diminish the island’s wilderness character and values. We believe those values could be permanently maintained under our management.

As part of our wilderness review, we also consulted with the Maine Department of Marine Resources list of aquaculture facility leases, both active and inactive. That list indicates that no other lease sites lie near WSA islands. We did not attempt to predict where new aquaculture operations may be proposed in the foreseeable future; we determined that prediction lay outside the scope of our analysis.

VIII. Land Acquisition

Comment. Some individuals and organizations opposed additional land acquisition because they believe private landowners can be better land stewards than the federal government.

Response. We acknowledge some private landowners are good land stewards, and achieve many of the same conservation goals we pursue. Respectfully, however, that does not guarantee long-term or permanent protection. An economic burden or family change may require a sale. These islands are under tremendous development pressure. Subsequent owners may not share the same conservation ethic. Federal ownership will guarantee that lands and natural resources of concern are conserved in perpetuity. In total, our land acquisition proposal would protect 3.2 percent of Maine’s coastal islands. Most coastal islands would remain in private ownership. Appendix A, “Land Protection Plan”, (LPP), describes our long-standing policy of acquiring land only from willing sellers.

We have a particular interest in ensuring that islands where seabirds nest are permanently protected by a conservation owner with the resources to sustain their presence. In our experience, the most productive and diverse seabird nesting islands are those with active management by on-site personnel. For example, on our seabird restoration islands, we control gulls and other avian and mammalian predators, manipulate vegetation, and manage human activity during the nesting season. Those activities require a level of expertise and funding that most landowners cannot afford.

On the other hand, many private landowners can and will undertake conservation actions, particularly if we provide guidance. We will continue to provide informational materials, and are developing a new island stewardship brochure. We are certainly willing to visit private islands and advise their owners on conservation practices, if they invite us.

Comment. Some individuals and organizations opposed additional land acquisition because they believe federal control of lands will restrict their use and access by a privileged few.

Response. Our priority is to protect federal trust resources. We allow public access to refuge land to the extent it can occur without impacting those resources. Chapter 2, table 2-1 displays our closure dates. Our preferred alternative B describes why and how we would implement the same closure dates on new lands acquired. Outside those closure dates, we allow public access. In fact, we contend that federal ownership allows the public to access some lands that were in private ownership, and otherwise closed.

Comment. We heard from at least 15 private property owners whose islands were included in our LPP. A few indicated their interest in selling to us, while a few others indicated they would never sell, because of trust restrictions, because they oppose additional federal ownership in Maine, or because they believe they are the best conservation stewards for their islands. Some sought clarification on how we selected their island. Others asked about the differences among acquisition methods, including the purchase and sale of full property rights or a conservation easement and the implications for use and access if they sold us only a conservation easement.

Response. We directly contacted each of those island owners, to further explain (a) how we determined that their island was nationally significant and not permanently protected; (b) our willing sellers only policy; and, (c) the distinctions between selling the Service full property rights and a conservation easement. All of the owners were satisfied with those explanations, and asked to be kept informed about our final proposal.

Comment. We received more than 38 comments recommending Sears Island as the best site for the Coastal Education Center. Most requested specifically that we add Sears Island to our LPP to facilitate those recommendations. The Friends of Sears Island believe that Service acquisition and an education center would be a good match with the town.

A few recommended that the Service acquire Sears Island because its location just off Route 1 makes it particularly accessible to the public, and its characteristics are compatible with other CCP goals and objectives, such as protecting habitat and species diversity, including a nesting pair of bald eagles: “[it] is allegedly the largest undeveloped island on the Eastern Seaboard, which makes it particularly an environmental priority and asset to be protected versus developed for industrial uses...”; and, “the island would fulfill the Biological, Land Acquisition, and Public Use Program criteria promoted by Alternative B.”

Response. We consider Sears Island nationally significant. However, our LPP list of islands proposed for Service acquisition did not include it, because it does not meet our criteria for a nationally significant island in need of permanent protection. We consider it permanently protected already, because the State of Maine owns it and manages it in adherence to state regulations on protecting wildlife and habitats.

Comment. The American Lighthouse Foundation, the Friends of Wood Island Lighthouse, and the U.S. Coast Guard urged us to withdraw Wood Island from our LPP. Their particular concern is the 8 acres now owned by the Coast Guard in which the American Lighthouse Foundation is interested. The U.S. Coast Guard states that the Wood Island Light is currently licensed to the American Lighthouse Foundation for repair, maintenance and historic preservation, an arrangement they indicate is mutually beneficial to their respective entities. The lighthouse organizations believe Service acquisition would adversely impact their work on the lighthouse. As they point out, “the community has seized upon the idea that the lighthouse will be their landmark and will be owned by the group that they are part of, rather than remaining property of the federal government.”

Response. We identified Wood Island as a nationally significant island because of nesting seabirds, and included it in our LPP because it does not meet our criteria for being in a permanent protection status. Of the two owners on this 45-acre island, the majority landowner prefers that the island stay on the LPP list. We state in our draft and final EIS that the Service is not interested in acquiring additional historic structures, including lighthouses, unless the purchase is necessary to protect federal trust resources. However, since the Coast Guard has specifically requested we not include their 8-acre tract in the LPP, we have removed it from our final proposal.

Comment. We received comments indicating that our draft did not address the need to acquire additional wetlands on the mainland.

Response. Objectives 7.3 and 7.4 in our preferred alternative B outline the ongoing protection of those vital habitats. Using primarily the goals and objectives of the North American Waterfowl Management Plan, we have worked closely with the Maine Wetlands Protection Coalition Team in developing their land protection and conservation plan to identify Maine coastal properties important for federal trust resources and to pursue their long-term protection. We plan to be a full partner in implementing the recommendations of their final plan.

Objective 7.3 in our preferred alternative specifically states that we will evaluate mainland properties the Maine Wetlands Protection Coalition Team or any of a number of other land conservation entities propose for Service ownership. We expect that team to recommend properties for Service acquisition within the next three years, and will consider those under a separate environmental analysis and public review process.

Frequently, we work with partners to identify important wildlife habitats in need of protection or conservation. For example, we are involved in a project in Greater Pleasant Bay, Washington County, to protect more than 750 acres of high value wetland and adjacent upland buffer habitat. That area has high biological productivity, extensive intertidal mudflats, and relatively pristine shoreline, which provides outstanding habitat for large concentrations of wintering and migrating black ducks, other waterfowl, and migrating shorebirds.

Our LPP identifies mainland properties with wetlands for Service acquisition. We are working with the U.S. Navy to arrange the transfer at no cost of 400 acres of coastal peatland we refer to as “Corea Heath,” on the Schoodic peninsula in the Town of Gouldsboro. In 1950, the Navy designated 240 acres as an Ecological Preserve Area.

We also identified the Sprague Neck parcel, 153 acres of the former U.S. Navy Computer and Telecommunications Station Center, in the Town of Cutler, Washington County. That parcel and its adjacent vast mudflats provide important feeding and roosting habitat for 19 species of shorebirds. More migratory shorebirds are found on Sprague Neck than anywhere else in Maine. The parcel lies on Little Machias Bay, which the Atlantic Coast Black Duck Wintering Habitat Plan has identified as a Focus Area in the North American Waterfowl Management Plan Joint Venture, and ranks second of 32 sites in Maine.

Comment. Many organizations and individuals supported our land acquisition proposal, “Appendix A, Land Protection Plan.” Most recognized the importance of protecting valuable, unique wildlife habitats in danger of loss and the role of the Service in protecting it. For example, the Maine Coast Heritage Trust stated “the refuge plays a unique and vital role in acquiring and stewarding the highest priority nesting islands.”

Response. Public support for our LPP is essential to its success. We were very pleased at the number of positive responses we received. To be sure, it is an ambitious plan, based on many prerequisites, not the least of which are the availability of properties for sale from willing sellers and our ability to secure funding. If the LPP is approved, implementing it will become one of our highest priorities.

IX. Seabird Island Management

Comment. One reviewer recommended that we minimize additional seabird island acquisition and, instead, focus our limited funding and staffing on broadening research, conducting inventories, and monitoring the refuge islands, particularly, to document their use by migratory birds.

Response. We also acknowledge the need for additional research, inventories, and monitoring on refuge islands. We are now doing, or have proposed in the preferred alternative, a great deal of monitoring on various islands, including migratory landbird and raptor surveys in spring and fall (objective 3.4), botanical inventories (objective 3.5), rare plant communities (objective 3.6), intertidal invertebrate studies (objective 4.2), fall shorebird migration (objective 4.4), winter waterfowl and shorebird monitoring (objective 4.5), Leach's storm-petrel monitoring (objective 5.7), and gull and eider censuses (objective 5.10). We are monitoring the resources that use these coastal islands, and anticipate significant increases in that monitoring. We are also working on a Habitat and Species Inventory and Monitoring Plan that will prioritize our monitoring.

Comment. One reviewer wrote that we made inaccurate claims about our involvement in the recovery of puffins and murres in Maine.

Response. We do not believe we misrepresented our involvement or that of our conservation partners in species recovery in Maine. We also do not support the claim that several of the species identified in the CCP (e.g., Atlantic puffins and murres) would simply be experiencing natural population recovery in Maine, at the level we have observed, without intervention by conservation agencies. We acknowledge that a small number of puffins were breeding on Matinicus Rock before large-scale restoration began. We also agree that some level of natural dispersal and population growth could have been expected from Matinicus Rock and Machias Seal islands. On the other hand, we still believe the management actions by the Service, MDIFW, and The National Audubon Society, significantly contributed to population growth. For example, more than 900 puffin chicks were brought to Seal Island between 1984-1989 to jump start a breeding population there.

Although no individual projects were established specifically for common murre, we believe murre have benefited from our predator control and management for puffins. Murre have only colonized managed islands in Maine. On Matinicus Rock, murre decoys and a sound system have been used to attract birds to the island. The only islands in Maine that routinely have murre visiting and exhibiting courtship behavior are three refuge islands: Matinicus Rock, Petit Manan, and Seal islands. We still believe that having a breeding population of common murre in Maine would represent a significant milestone in restoring seabird diversity.

Comment. One reviewer stated we were incomplete in our description of the status of great cormorants.

Response. We clarified our statements regarding the population status of cormorants in Maine (objective 5.11) in the final EIS. We acknowledge the considerable amount of recent monitoring of the great cormorants' population status, but we do not believe we have sufficient information on productivity rates or factors that may be limiting population growth.

Comment. One reviewer disagrees with our use of the term “restoration” instead of “management” when we discussed our seabird projects, and suggests our use of the term restoration was simply “fundraising spin” to assist in promoting our projects.

Response. We agree that we used these terms interchangeably in our draft. However, we believe that either term could define our seabird projects accurately. Although we have not determined a need to differentiate between those terms in the program, we have revised our glossary to include a definition of “seabird restoration.”

Comment. Two reviewers recommended we continue to acquire seabird nesting islands, but that we secure long-term funding to manage our current seabird projects as a priority.

Response. We still believe that one of our highest priorities is to acquire the nationally significant seabird nesting islands that remain unprotected. Without conservation ownership, many of those islands face threats from development and uncontrolled access. Also important, the funds we use to acquire islands are not the same as the funds we use to manage them. We acquire land with funds allocated from the Land and Water Conservation Fund; they are restricted to that single purpose. Management and research funds typically derive from the annual appropriations for refuge operations, and cannot be used to acquire land.

We acknowledge the need to secure annual, long-term funding for the six seabird restoration projects now underway, and will continue to seek alternate means of securing consistent funding for those islands. Recently, we have had to rely on grants and other sources to fund those programs.

Comment. MAA asserts the Service should not acquire any additional seabird islands because the refuge already includes 25 islands that could support seabird restoration.

Response. We do not concur that our foregoing the acquisition of additional seabird nesting islands over the next 15 years is a good long-term management strategy for conserving seabird diversity in the Gulf of Maine. Although some of the 25 refuge islands referred to by MAA support nesting seabirds and waterfowl, most do not meet the criteria established by the Roseate Tern Recovery Team for consideration as a sustainable tern restoration project.

Many of those islands do not provide suitable nesting substrate for terns, are too close to the mainland, have not supported nesting terns in the past, harbor mainland-based predators, lack suitable landing conditions for safe access by our staff, or do not increase the geographic distribution of the colonies in the Gulf of Maine. On the other hand, many of those 25 islands provide valuable nesting habitat for a variety of other seabirds or bald eagles, as well as important migratory bird habitat for numerous shorebirds and landbirds of conservation concern.

We still believe that ensuring conservation ownership in the near term and protection from future development in the long term for those islands is the first crucial step in conserving seabird diversity throughout the Gulf of Maine.

Comment. MAA comments that our draft has no documentation to “support the supposition that aquaculture operations in Maine may have resulted in lower nesting productivity and higher nest abandonment on more than one site.” They also express concern over our having included a reference to a study from Canada, which they believe is not relevant, and our having omitted a reference to a study by Norm Famous (Famous 1991) from Maine, which they believe is relevant.

Response. Objective 4.3 of the draft inadvertently refers to impacts on seabird nesting, when we intended it to refer only to documented impacts on bald eagle nesting. We have corrected that over-

sight in this final EIS. We know of no studies that evaluate the direct impacts of aquaculture facilities close to nesting seabird islands in Maine.

However, in our professional opinion, studies by the Canadian Wildlife Service (CWS) in British Columbia are relevant for Maine, and provide valuable information and recommendations regarding the best management practices for aquaculture operations close to seabird nesting sites. Objective 4.3 also states that we would develop and implement research and monitoring programs to evaluate that relationship.

We acknowledge that the 1991 Famous report does not indicate that the operation of the Cross Island facility significantly affected seabirds. However, two factors must be considered in evaluating its findings: (1) no pre-development monitoring occurred, so we are unable to assess any changes that may have resulted from the development and operation of the 45-acre finfish operation; and, (2) Cross Island does not have nesting seabirds; it is a densely forested island.

Comment. MAA suggested that the Service should have conducted its own research on the interactions between seabird nesting and aquaculture operations if we thought a significant risk existed. They stated that perhaps ours was an active choice not to do it, based on aquaculture's relatively low level of threat to the resource.

Response. We disagree with MAA's assertion that our lack of research on the impacts of aquaculture operations on nesting seabirds demonstrates a lack of concern or an assumption of low risk to seabirds. Before the Little Libby aquaculture site was established in July 2004, no finfish pens in Maine had been located adjacent to a seabird nesting island. In fact, there had been no opportunities to study interactions between nesting seabirds in Maine and aquaculture operations. As a result, we have relied on reports published in other regions and on our professional judgment.

In December 2003, representatives of Atlantic Salmon of Maine and we had agreed on a project development schedule that would allow us time for baseline research and monitoring before the site development at Little Libby Island. A subsequent change in project development and stocking dates by Atlantic Salmon of Maine precluded the opportunity for us to obtain any pre-development baseline data.

Nevertheless, we recognize the need to conduct research on the relationship between aquaculture operations and nesting birds. Objective 4.3 mentions the need to evaluate aquaculture operations and their potential effects on bald eagles, wading birds, and seabirds. In this and other objectives, we encourage industry representatives to assist in that evaluation.

Comment. The MAA expressed concern that the plan does not quantify or assess the cumulative impacts on nesting seabirds caused by the activities of refuge staff, researchers, or conservation partners.

Response. Our management actions on refuge seabird projects were specifically developed and recommended in a number of documents we cited in chapter 1, including the Roseate Tern Recovery Plan, the Tern Management Plan, and MDIFW Species Assessments. Each of those documents were prepared or reviewed by a variety of professional biologists representing a number of agencies and conservation organizations. We also participate in the Gulf of Maine Seabird Working Group, which consists of a variety of professional entities, including the University of Maine, University of New Brunswick, National Audubon Society, Maine Audubon Society, MDIFW, USFWS, and numerous interested individuals. That group meets twice a year to review restoration progress and discuss management concerns.

We design all of our management techniques to enhance nesting success. We have closely monitored the productivity rates at each of these colonies, and have written protocols designed to minimize researchers' disturbance of the nesting birds. Those protocols were all derived from peer-reviewed documents. We have also developed a compatibility determination that establishes the conditions under which research activities can occur and still remain compatible with refuge purposes.

Refuge islands now support more than 80 percent of the common terns and more than 97 percent of the Arctic terns that nest in Maine. The results of more than 20 years of monitoring the colonies clearly indicate that the terns demonstrate significantly higher nesting densities and productivity rates on islands where the researchers control nesting gulls. Although we acknowledge that our presence on the islands creates some level of disturbance, the absence of gull control likely would result in significantly lower tern productivity and, eventually, their abandoning the colony. The continued monitoring allows management agencies to annually assess productivity, prey availability, predation rates, and potential health concerns before any of those become a significant concern.

Comment. The Ocean Conservancy, Conservation Law Foundation, The Wilderness Society, and several individuals expressed concern with certain seabird habitat management practices, recommending the practices either be eliminated or used with extreme caution and their effects be monitored closely. Sheep grazing, using herbicides or avicides, prescribed burning, and mowing were mentioned.

Response. The premise of our entire seabird nesting islands management is based on the goal of sustaining healthy and productive nesting seabirds. We work with other professionals managing seabirds in the Gulf of Maine and rely on our past experiences to determine the best mix of actions on each island to achieve that goal. We are also interested in conserving our resources of time and money, to be as effective and efficient as possible in achieving it.

We do not conduct all of these activities on any one island. Indeed, we have already determined that some actions are ineffective on particular islands. In each case, a very individualized prescription requires adaptive management strategies. The acreage figures in the plan in chapter 4 for burning, mowing, and using herbicides are combined annual maximums for the mainland and islands. We describe the potential consequences of each of these activities on the human and natural environment. We are now intensively managing only six islands with multiple types of treatment. We offer the following descriptions, in addition to our discussions in chapter 4, to lend perspective on our island management.

Applying herbicides. We have used Roundup on less than 1 acre on Petit Manan Island to control raspberries. We have adhered to all federal requirements for its application.

Burning prescribed fires. We have limited prescribed burning to 8 acres on Petit Manan Island. We adhere to our Fire Management Plan, which includes stipulations to minimize impacts on air quality and soil productivity. The conditions we typically encountered resulted in a very light burn.

Mowing vegetation. We have restricted mowing to less than 2 acres on Petit Manan Island, to maintain suitable tern nesting habitat and fire breaks.

Grazing sheep. We allow sheep grazing to maintain suitable tern nesting habitat on two refuge islands: Metinic, and Nash. We now have 8 years' experience with sheep grazing close to seabirds nesting on Metinic Island. We have been monitoring its vegetation during that time. In our professional judgment, we have found grazing to be an effective method of managing vegetation at tern nesting sites that requires a minimal commitment of resources. We believe that the appropriate management of

grazing, including the exclusion of sheep from nesting areas during the nesting season, eliminates concerns over trampled nests and eggs. Management under special use permit will allow us to minimize impacts on soil by controlling the stocking rates and timing of grazing. However, because of the dynamic conditions on those islands, we have agreed to reevaluate the effectiveness of sheep grazing within 5 years of CCP approval (see appendix C).

Applying avicides. We are using avicides only in combination with non-lethal techniques, in the first 2 years of a seabird restoration project, and only when nesting gull populations are too high to control by any other means. The type of avicide is approved and regulated by EPA. We describe our use of this product in chapter 3, and its impacts in chapter 4. The Denver Research Center has tested the product extensively for nontarget impacts or secondary poisoning effects. We have not observed any impacts on nontarget species during post-treatment monitoring.

We have established monitoring protocols to evaluate the responses of seabirds and vegetation to those management activities. They will be incorporated into the Inventory and Monitoring step-down plan to be developed within 2 years of CCP approval.

Comment. One reviewer suggested the CCP should include more gull and cormorant control.

Response. We control gulls only on seabird restoration islands where competition and predation by gulls adversely affects seabird restoration. Other than those control measures, we do not believe additional gull control is warranted or necessary to achieve refuge purposes. We do not control cormorants, nor do we foresee the need for taking action anytime soon to achieve our refuge purposes.

Comment. The Wilderness Society opposes our modifying the public access closure date on eider or gull nesting islands from August 31 to July 31.

Response. We based that change in closure dates on the nesting chronology of gulls and common eiders. They have finished nesting by July 31. Although we did not modify the dates simply to accommodate additional recreational activities, we do point out in chapter 4 that this change in dates will allow for an additional month of compatible public access. Our dates also coincide with those of the State of Maine.

X. Bald Eagle Management

Comment. MAA states that we should remove from our plan any assertion without documentation that bald eagles are sensitive to disturbance and will only nest in areas away from human activity. MAA claims its members' experiences counteract that assertion: some have seen eagles establish nests next to operations that have been active for years.

Response. Objective 3.1 states "During the nesting season, eagles are sensitive to disturbance and will typically nest in areas with minimal human disturbance." Numerous publications document the need to protect nesting eagles and their breeding habitat from human disturbance and habitat loss.

We added two references in the final EIS and CCP: "The Bald Eagle," M.Stalmaster, 1987, Universe Books, 227 pages; and, "A summary of conservation and management concerns specific to eagles in Maine," in McCollough et. al., 2003, Maine's Endangered and Threatened Wildlife, Maine Department of Inland Fisheries and Wildlife, 117 pages. MDIFW also recognizes that potential disturbance, and developed essential habitat legislation to regulate activities within one-quarter mile of bald eagle nests.

During the 1990s, MDIFW documented four examples of finfish aquaculture facilities having been developed near nesting eagles: Salt Pond Blue Hill Bay, Treat Island in Eastport, Eastern Bay in Jonesport, and Hardwood Island in Tremont. In all four examples, the facilities lay close to the nesting eagles and directly in their line of sight from the nest. All four examples showed impacts on nesting success: the eagles either abandoned the nest or showed decreased reproduction (C.Todd pers.comm.).

Objective 4.3 acknowledges that aquaculture and eagles can coexist, with sufficient visual screening and adequate distance between the pens and the nests. For example, the aquaculture facility at Cross Island is located 2,800' from the nesting pair of eagles, and we did not document any disturbance related to facility operations.

Only two aquaculture facilities are located near nesting eagles. MDIFW is monitoring nesting success as part of their statewide census. The Hardwood Island project in Tremont remains in operation, and the eagles nest within one-quarter mile of the pens. Unfortunately, that pair has experienced a reproductive rate of 0.40 young per pair, less than half the statewide average (C. Todd pers. comm.) The other example is Stone Island, where aquaculture operations have been intermittent and the pair of eagles has not consistently nested in recent years. Both of these examples involved extensive, continued consultation among the operators, MDIFW, and the Service.

XI. Administration

Comment. We received requests to consider changing the name “Petit Manan NWR Complex” to a name that reflects the current mission and geographic coverage of the refuge.

Response. We agree with those comments, and propose to change the name of the entire refuge complex from the “Petit Manan” to the “Maine Coastal Islands National Wildlife Refuge.” The name “Petit Manan,” taken in 1976, refers to the early and important refuge units Petit Manan Point and Petit Manan Island. Although those are still very important in refuge management, the refuge has expanded to include islands ranging from the Canadian to the New Hampshire border. We determined that the name “Maine Coastal Islands National Wildlife Refuge” better reflects the goals of the refuge and its geographic coverage.

Comment. The MAA expressed concern that the plan contained a violation of the prohibition on federal employees lobbying elected officials.

Response. We do not intend to lobby elected officials. We intend to provide both the community and public officials with an understanding of the operations and significance of the refuge mission, although we now understand how readers could have misinterpreted the wording of draft objectives 8.3 and 8.4 as potential violations of the prohibition against lobbying. We will change that wording in our final EIS and CCP to lessen the likelihood of its being misconstrued as an intent to lobby elected officials.

Comment. We received comments that our staff and funds are already spread too thin, and we should not expand or initiate new programs at the expense of meeting current program needs.

Response. We face a real challenge in implementing refuge programs using present staff and funding. The spirit of this plan lies in looking to the future for opportunities to add resource protection. Our preferred alternative identifies funding and staffing needs to accomplish its priorities. The CCP outlines project proposals for the next 15 years. As we receive our annual budget allocations, we will determine to which of those projects we should assign priority.

We also emphasize partnerships throughout the plan for meeting many of its objectives. Partnerships are an important component; they will help offset the cost of new initiatives. Objective 8.3 also promotes an increase in volunteers, who will play a valuable role in fulfilling the mission of the refuge.

Comment. We received comments that requested more public access to Petit Manan, Seal, and Matinicus Rock islands, and suggested that, if the access occurred only in prescribed areas, the birds would adapt to the visitation, which would nourish public interest in seabirds. Some mentioned that preferential treatment is sometimes given to certain special visitors, such as allowing them access during the closed season when the public is not allowed.

Response. Seasonal closures on all of the refuge seabird and eagle nesting islands reduce disturbance during critical periods. Access usually is restricted to the essential personnel necessary to conduct research and protect sites from disturbance. Under special circumstances, and under close supervision, some visitors have been allowed on islands during the nesting season. In most cases, we have granted that exception for educational, media outreach or the fund-raising activities of partners, when there is a direct benefit to Service programs.

Nevertheless, in response to this concern, we agree to develop guidance on appropriate protective measures required for visitation to nesting islands within two years of CCP approval, in conjunction with the development of our Visitor Services Plan. As in our discussion of environmental education, above, we will also evaluate whether opportunities exist for educational programs on nesting islands (see objective 6.1).

Comment. The MAA commented that the “Refuge does not have adequate resources to meet their cultural resource public trust responsibilities (p4-44) and yet they are proposing the acquisition of new properties on which they have no clear inventory of what additional responsibilities they may be adding.”

Response. We acknowledge in our draft that maintaining our historic resources, namely, the lighthouses and associated light keepers buildings, is very expensive. Chapter 3, “Affected Environment,” lays out our expenses over the last 5 years under current management. We designed objectives 7.7 and 7.8 in our preferred alternative to address those challenges. We will develop a Cultural Resources Plan, establish partnerships, and seek alternate sources of funding to help meet our trust responsibilities. Accomplishing those objectives would result in a significant increase in our ability to meet and carry out national mandates to protect cultural resources on refuge lands.

One good example of a partnership worth pursuing is the American Lighthouse Foundation. That group has stated its interest in forming a partnership with the Service to protect some of the Service-owned lighthouses. Finally, our preferred alternative recommends that the Service acquire no additional historic structures, unless absolutely necessary to protect resources.

Comment. The Wilderness Society opposes any commercial activities on the refuge, and specifically mentions the grazing of sheep, the commercial harvesting of resources in the intertidal areas, and the picking of blueberries as examples.

Response. We do not regulate commercial harvesting in intertidal areas. That is regulated by the State of Maine, although draft objective 4.2 identifies our interest in monitoring the impacts of those activities on resources of concern. The blueberry harvesting allowed is limited to personal use only, and no raking is allowed. As in “Seabird Management,” above, we use sheep grazing only as a vegetation

management tool to promote seabird nesting. Appendix C includes compatibility determinations for recreational blueberry picking and sheep grazing.

XII. Partnerships

Comment. The National Park Service, Acadia National Park (ANP), recommended we establish a partnership with them to facilitate island research and monitoring.

Response. We agree that establishing a formal partnership with ANP would mutually benefit our agencies and help advance the conservation and stewardship of coastal resources. This fully complements our preferred alternative, which identifies the need to continue exploring partnership opportunities, including those promoting research, surveys, monitoring, island stewardship, and law enforcement. We will continue to meet with ANP staff to search for ways to act as partners in those activities.

Comment. The MAA commented that the Service ignores the potential assistance that the aquaculture and commercial fishing industries can give in critical management functions. They also suggested we consider industry representatives as potential island stewards.

Response. We acknowledge that establishing new partnerships is always beneficial for refuge programs. We have relied heavily on partners to assist in virtually all aspects of refuge management because of the large size of the refuge complex and the small size of its staff. Chapter 3, "Affected Environment," outlines some of our partnerships. One of the significant issues in chapter 1 is building effective partnerships to protect coastal habitats. Drawing upon all available partnership resources as we move forward in implementing the goals and objectives of our final plan will be crucial if we hope to achieve them.

We routinely talk with commercial fisherman who work on the waters adjacent to refuge islands, and value their insight and observations of natural processes. We plan to start an island stewardship program (objective 6.6), and would welcome the opportunity to talk with any interested parties.

Objective 4.3 states we will begin to determine the effects of present and proposed commercial aquaculture facilities in the waters adjacent to refuge islands supporting nesting seabirds, wading birds, and bald eagles. One strategy for that objective clearly identifies the aquaculture industry as a research partner. An additional strategy specifies that we will continue working with the industry to minimize the potential adverse effects of future aquaculture projects, including site location, cage design, stocking levels, fish age, netting characteristics, and project initiation intervals. We will also explore other opportunities for partnerships with industry representatives.

Comment. Several reviewers suggested that the Service has failed to recognize that private island owners are capable of conservation stewardship, and recommended that we develop a landowner outreach program and provide information and programs to assist landowners in meeting resource objectives.

Response. Many individuals are doing an exceptional job of managing their islands. We heard from other island owners who had no interest in selling their island, but who would like to have us distribute information and conduct programs to guide resource management on their islands. Based on those comments, we are developing a guide for island owners to assist in the effective stewardship of seabird nesting islands. Other conservation partners are developing resource guides, and we will direct landowners to those sources once they become available. And as always, our staff are available to provide information upon request.

We have also secured grant funding and have produced a sign designed to alert the public to the closures of seabird islands during the nesting season. Those signs will be available free of charge to private island owners who are interested beginning in May 2005.

We will continue to pursue opportunities to increase the dialogue among our staff, other Service programs, private island owners, and other organizations involved in protecting and conserving islands. Private island owners will always play a major role in island conservation and stewardship.

XIII. Impacts on the State and Local Economies

Comment. MAA noticed we had omitted one word from our quotation of the Governor’s Final Task Force Report on the Planning and Development of Marine Aquaculture in Maine: We had omitted the word “unreasonably” before the word “interfere.” According to MAA, the task force members had selected that adverb as a “carefully considered word and specifically intended to convey the need to balance uses.” Our having omitted it from our quotation, according to MAA, seriously mischaracterized that report’s findings.

Response. We acknowledge our omission of the word “unreasonably” in quoting that report. Our omission was inadvertent, and was not meant in any way to misconstrue the findings of the report. In fact, we fully support the need to engage the aquaculture industry, state and federal agencies, and conservation interests in defining and implementing actions to achieve balance among them.

Comment. According to MAA, our draft plan paints an overly pessimistic view of the potential for salmon aquaculture in the state. They agree that the salmon farming sector has suffered a number of setbacks. However, they note that the potential for continued, sustainable development is significant and, that our plan should give a more balanced view on the potential for development.

Response. We agree with MAA’s comment that sustainable domestic production of seafood is in the national interest. Chapter 3, “The Affected Environment,” acknowledges that the salmon industry, in particular, is very important to Maine’s economy. Our describing some of the industry’s setbacks in recent years was not meant to diminish its significance. We hope it remains a very viable industry in Maine. Our intent certainly was not to convey an overly pessimistic view of the future of the industry, as we have no expertise to predict its future; instead, we were merely trying to convey the challenges to us, as industry observers, of predicting the location or timing of new operations.

Comment. MAA notes that aquaculture acts as a novel tourist attraction and, that our plan ignores any negative impacts on the tourism industry that may occur as a result of restricting aquaculture operations or future development.

Response. We are unaware of any commercial boat tours using aquaculture facilities as their main attraction. We acknowledge that operators will take boats by aquaculture facilities and other interesting sites such as lighthouses, as part of their tours; however, those visits are incidental to the main purpose of the trip to view wildlife and natural scenery.

Our seabird management program supports commercial viewing opportunities (see chapter 4); expanding it may afford one new opportunity in a new area after 8 to 10 years.

Comment. MAA claims that the EIS should contain a more up-to-date, comprehensive, and balanced assessment of the impacts the refuge complex has on local and state tax bases, including the income and business taxes paid by commercial operators that may be impacted.

MAA also states that the analysis of the refuge expansion impacts on property taxes in our EIS is misleading, and that our plan contains no analysis of the impact of the current refuge landholdings on property taxes.

Response. Chapter 4, “Environmental Consequences,” describes in detail the contribution of current and proposed refuge activities to state and local economies. We have responded to the concern with impacts on commercial harvesting in other responses in this section.

Dr. Charles Colgan, Professor of Public Policy, University of Southern Maine completed our analysis of the property tax impacts of proposed refuge expansion. Dr. Colgan has published extensively on the economics of natural-resource-based industries in Maine. Our analysis did not include current refuge islands, as their impacts on property taxes were described in previous NEPA documents. Rather, the analysis in this EIS focuses on the potential property tax consequences resulting from the expansion proposed in each alternative.

Chapter 4 summarizes Dr Colgan’s analysis, and appendix G provides detailed information on the property tax implications arising from Service acquisition of individual islands in their respective towns. We rely on Dr. Colgan’s expert opinion to describe the impacts on towns; he refers to the property tax impacts for the region as “quite small” (alternative A), “small” (alternative B), and “relatively small” (alternative C).

Appendix G identifies those islands not included in the analysis because (1) they already exist in a non-tax status; (2) no information was available from the town; or, (3) they are bald eagle nesting islands over 200 acres in size. Two islands proposed for Service acquisition in our preferred alternative and LPP fall into category (1).

We recognize that some may view our property tax data from 2000-2003 as outdated now. Unfortunately, that has to do with the time span required to develop an EIS, coupled with the dynamic nature of property tax values in coastal Maine. Property values have risen sharply in the last couple of years, which may also reduce mil rates, so that the actual tax impacts would not fully reflect recent real estate markets (Colgan, pers com, 2004). We have included more explicit statements in chapter 4 and appendix G that, although those values were the best information available to us at the time, it is likely that they underestimate impacts now, given the current realty climate in coastal Maine.

Comment. MAA expressed concern that our draft suggests the current seabird viewing industry is constrained by a lack of viewing opportunities and, that our draft uses that assertion to argue that a refuge expansion would generate increased economic activity.

Response. Chapter 3 describes the economic significance to coastal Maine of its seabird viewing industry. Two refuge islands are now the focus of tour boat trips: Petit Manan Island, where seabirds nest, and Cross Island, where eagles nest. Machias Seal Island, managed under a MOU with the State of Maine, is another popular island for commercial seabird viewing tours.

Chapter 4 describes the foreseeable effects on the local and regional economies of implementing each of the alternatives. It specifically refers to information provided by Dr. Colgan on the potential expansion of the seabird-viewing industry. According to that information, the industry does not have the potential to significantly expand, given the current distribution of active seabird colonies of sufficient numbers and in locations readily accessible to viewing, to make new commercial ventures based on that activity worthwhile.

Chapter 4 also states that it is impossible to differentiate among the effects of alternative nesting habitat protection strategies from the perspective of economic value. We do not justify our proposed refuge expansion solely on the basis that it would generate increased economic activity in the wildlife viewing industry. Although expanding the refuge to protect additional habitat will help maintain and may even expand seabird viewing opportunities over the long term, we also identify its economic costs.

Comment. MAA expresses concern over our assertion that the refuge complex would not impact present or future aquaculture operations. They claim the refuge has already had a “significant chilling effect” on aquaculture investments in the state, and that the refuge has already effectively precluded the development of a number of prime potential aquaculture sites. MAA and several other reviewers expressed particular concern over the potential for further restrictions, if the proposed refuge expansion is implemented.

Response. Chapter 1 describes the potential impacts on the aquaculture industry as an “Issue Outside the Scope of this EIS/CCP.” Furthermore, our refuge staff has no jurisdiction in the aquaculture lease process. The federal jurisdiction to approve and issue permits lies with the ACOE, which also is responsible for completing a NEPA compliance document before it issues a permit. We spoke with Jay Clement, ACOE, who confirms that no aquaculture permit has been denied at the Federal level simply due to its adjacency to Federal lands (Clement, pers com, 2004). Our contacts with Mary Costigan and Laurice Churchill, State of Maine DMR, confirm that no permit has been denied at the State level for that reason for at least 10 years (Costigan, pers com, 2004; and Churchill, pers com, 2004).

Chapter 4 mentions that no active aquaculture leases lie in the vicinity of any island proposed for acquisition. Should a lease adjacent to a Service-owned island be proposed, our Maine Field Office probably would recommend to the ACOE that they establish a quarter-mile buffer around the island; they have consistently done so in the past. However, it is important to note that that recommendation has not always been incorporated into permit conditions.

Under our preferred alternative, the Service would expand the existing refuge boundary to acquire 87 additional islands. Assuming that we could acquire all 87, the total in Service ownership would represent less than 4 percent of the islands along the coast of Maine. Although the Service does have limited authority to mean low water, the designation of land as refuge land does not preclude commercial activities in adjacent areas, evidenced by the salmon aquaculture facility permitted off Cross Island refuge and the lobster pots off virtually every refuge island. We still predict no significant impacts on the salmon aquaculture industry from refuge land acquisition or management.

Comment. MAA states that we should include estimates of the economic impact of the refuge complex and its proposed expansion on the sustainable harvest of soft clams, seaweed, and worms.

Response. We have prohibited rockweed harvesting on refuge lands since 2001, under federal regulations which prohibit the taking of plants off refuge lands, and contacted all state-licensed rockweed harvesters at that time. We would implement that prohibition on all islands we acquire in the future.

Chapter 4 acknowledges that we cannot estimate accurately the potential economic loss, because we do not know the level of the rockweed harvest or the number of harvesters on the islands proposed for acquisition. Further, Dr. Colgan was unaware of any entity tracking reliable statistics on the rockweed harvesting industry (Colgan, pers comm., 2004), nor could we locate any on the Maine DMR website.

The State of Maine regulates the harvesting of soft clams and worms. Some statistics on those industries are available at www.maine.gov/dmr/commercialfishing. As we note in the discussion of aquaculture, above, the Service has limited authority to mean low water, and designating land as refuge land does not necessarily preclude commercial activities such as these. As a result, we did not predict any impacts on those activities, and did not conduct a detailed economic analysis.

Comment. MAA suggests that we should use the same approaches (monitoring, education, and best management practices) to management with respect to aquaculture as we use for ecotourism and other activities that impact or occur on refuge property. They also assert that the proposed trail construction and subsequent increase in public visitation will adversely affect resources at a much greater rate than allowing an aquaculture lease within a quarter-mile of a nesting island.

Response. We believe MAA's comparison of adverse effects on refuge resources from aquaculture operations (in off-shore waters) versus trail construction (on the mainland) has no basis, given the locations of these activities and the locations of our predicted increases in visitation. Our prediction in the preferred alternative that overall visitation would increase to 25 percent annually, or 11,750 visitors, attributes that increase in visitation primarily to increases in commercial seabird viewing tours.

"Effects on Public Access, Educational and Recreational Opportunities" in chapter 4 describes the consequences of implementing our proposed public use program, including developments on the mainland. We predict an additional 2,700 annual visitors on the mainland, primarily attributed to group educational and interpretive programs. We plan to improve the public use infrastructure on our mainland divisions to improve the quality of the experience, and chose locations that would minimize disturbance and habitat alterations. Our preferred alternative includes the development of a Visitor Services Plan, which will establish thresholds of acceptable change resulting from visitor impacts on natural resources.

We also predict an additional 940 on-island visitors, whose visits would occur outside of nesting closure periods and would spread out over our expanded island ownership. Our seasonal island closures allow access only by mission-critical personnel during the nesting season. Even they must adhere to strict protocols on the islands to minimize the disturbance of nesting birds.

We have developed voluntary best management practices for the seabird viewing industry operating in the waters adjacent to refuge islands. Although we have no authority to require them to implement those practices, our observations indicate that most operators are complying.

Objective 4.3 proposes that we continue to work with the aquaculture industry to develop best management practices that minimize the potential adverse effects of future aquaculture projects, including site location, cage design, stocking levels and fish age, netting characteristics, and project initiation intervals. We will also explore other opportunities for partnerships with the industry.

Comment. MAA commented that our LPP seriously understates the potential socioeconomic and cultural impacts.

Response. As above, "Effects on the Local and Regional Economy" in chapter 4 describes the foreseeable socioeconomic impacts we can predict from the land acquisition proposed in each alternative. We asked Dr Charles Colgan, Professor of Public Policy, University of Southern Maine, to analyze property taxes. Appendix G provides detailed information on his analysis. Appendix A, our LPP, does not dismiss those economic impacts. Instead, it refers to the predictions in chapter 4, but does not repeat the entire discussion.

XIV. Recommended New Alternatives and Revised Scope of Analysis

Comment. MAA proposed a new alternative, “No Refuge Complex Expansion,” to refocus additional resources on managing existing refuge properties rather than on acquiring new properties.

Response. We evaluated four alternatives in detail, and considered but did not fully develop an additional one. We believe we have evaluated the reasonable range of alternatives required by the National Environmental Policy Act of 1969. NEPA does not require that all possible combinations of actions be evaluated.

First, we would like to clarify the distinction between the phrases “no new refuge acquisition” and “no refuge expansion.” No new refuge acquisition means we would not acquire an additional acre, no matter where that acre lay. No refuge expansion means we are not seeking approval to expand our existing boundary.

In chapter 2, “Actions Common to All Alternatives” and “Alternatives or Actions Considered But Not Fully Developed” describe the importance of our acquiring the land within the existing, approved refuge acquisition boundary. That land is very important for achieving refuge purposes. Service ownership will allow more effective and efficient refuge management. Therefore, all four alternatives propose that we acquire it.

Chapter 2 also states that no federal or state agency, elected official, individual, or organization previously has suggested we pursue an alternative that precludes any additional refuge acquisition. Three of the four alternatives we evaluated in detail propose an expansion of the approved refuge boundary. Alternative A proposes an expansion of 30 islands and 153 acres on the mainland. Our preferred alternative B proposes 87 islands and 153 acres on the mainland. Alternative C proposes 151 islands and 153 acres on the mainland. Alternative D proposes that we acquire only the land within the existing, approved refuge acquisition boundary. We would not pursue a refuge expansion. We trust that the range of those proposals is reasonable and meets the intent of NEPA.

Comment. MAA does not support our claims that the refuge impacts on aquaculture are not significant, do not merit detailed analysis, and fall outside the scope of the EIS. They believe the impact on the aquaculture industry merits categorization as a “significant issue,” based on its potential socioeconomic impacts on surrounding communities.

Response. Our response to a comment above in “Impacts on State and Local Economies” addresses MAA’s contention that the refuge is already having a very real impact on existing aquaculture operators. Chapter 1 describes why we determined that a detailed analysis of the impacts on aquaculture activities lies outside the scope of our EIS. We support that determination as a thorough and reasonable one.

XV. Public Involvement

Comment. Some people commented that our notifications of public hearings were inadequate; in particular, that we should have contacted the owners of the islands in alternative C directly; also, that refuge staff should communicate directly with the owners of all the islands listed.

Response. It is correct that we did not contact directly the 94 owners whose islands are included in alternative C but are not included in our preferred alternative B. We focused on contacting the 87 owners whose islands we included in our preferred alternative. We apologize for any inconvenience or concern that may have caused the additional 94 owners included in alternative C.

We acknowledge that the notifications we published may not have reached everyone who was interested in our draft. Nevertheless, we notified a mailing list of more than 1,200 individuals, organizations, federal and state agencies, and town officials. We contacted all of the island owners whose islands we proposed for Service acquisition in our preferred alternative and the LPP. In the “Federal Register” of April 30, 2004, we published the dates, times, and locations of all the public hearings.

We contacted more than 15 media sources with the same information. The Portland Press Herald, Bangor Daily News, and Boston Sunday Globe wrote feature articles on the project, and alerted readers to the hearings. We paid for five advertisements announcing the hearings in major daily newspapers. National Public Radio announced the meetings. We posted notification of the meetings on our website. We posted notices at refuge kiosks. The Friends of Maine Seabird Islands helped advertise the meetings. Several conservation organizations posted the meetings on their websites, and encouraged their members to attend. Other organizations posted notices in newsletters. We also alerted MDIFW and congressional representatives.

XVI. General Support for Specific Alternatives in Draft EIS

Comment. We did not receive any comments that preferred either alternative A or D in its entirety, although some preferred specific actions in those alternatives. For example, some reviewers preferred the no change in management on Petit Manan Point in the former while others preferred the limited management on refuge islands in the latter. Some advocated alternative C, because it includes the most land acquisition and is the “most protective one” or because they viewed it as the most expansive plan. The Ocean Conservancy strongly supports alternative C, largely because of its research program.

Other organizations, such as the Conservation Law Foundation, ask that we incorporate some aspects of alternative C into our preferred alternative B. The Maine Chapter of the Wildlife Society suggests moving the land acquisition proposal in C to B. The Wilderness Society supports the designation of wilderness in both alternatives, but prefers the land acquisition proposal in alternative C, and further suggests a combination of alternatives B, C, and D.

The Ocean Conservancy strongly prefers alternative C to alternative B, citing C’s combined land acquisition, increased research, and recommended WSAs.

We received 428 comments that supported our preferred alternative from individuals and from a wide range of conservation organizations, including the Islesboro Islands Trust, Friends of Maine Seabird Islands, Maine Coast Heritage Trust, Bagaduce Watershed Association, Boothbay Region Land Trust, and National Audubon Society Seabird Restoration Program.

Response. As we mention above, NEPA requires that a reasonable range of alternatives be analyzed. It does not require that we analyze all possible combinations of actions. We believe the combination of actions in the alternatives we analyzed in detail best meets the intent of analyzing potential alternate ways to achieve the Refuge System mission and refuge purposes and goals.

XVII. Clarifications and Corrections

Comment. One reviewer expressed concern over our definitions and analysis of impacts on minority and low income populations in “Environmental Justice” in chapter 4.

Response. We believe we have used accepted definitions from reliable sources, and that we have met their intent in our analysis.

President Clinton’s Executive Order No. 12898, February 11, 1994, states that federal agencies will achieve environmental justice by identifying and addressing, as appropriate, any disproportionately high and adverse human health or environmental effects resulting from its programs, policies, and activities on minority and low income populations in the United States and its territories. We obtained our information on minority and low income populations from the U.S. Census Bureau 2000.

We used those statistics on poverty to assess impacts on low income populations. According to the Census Bureau website, “Poverty status is defined by family—either everyone in the family is in poverty or no one in the family is in poverty. The characteristics of the family used to determine poverty status are number of people, number of related children under 18, and whether the primary householder is over age 65. An income threshold is determined given a particular family’s set of characteristics; if that family’s income is below that threshold, the family is in poverty” (<http://www.census.gov/hhes/poverty/povdef.html>).

The Census Bureau website uses the term “minority populations” as inclusive of the following races: Black, Hispanic, Asian, Pacific Islander, or American Indian/Alaska Native. Those racial classifications conform to the October 30, 1997, Federal Register Notice entitled, “Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity” issued by the Office of Management and Budget (OMB). Those standards govern the categories used to collect and present federal data on race and ethnicity. The OMB requires five minimum categories for race: American Indian and Alaska Native, Asian, Black or African American, Native Hawaiian and Other Pacific Islander, and White. Some federal surveys include a sixth category, “Some other race,” added with OMB approval (<http://quickfacts.census.gov/qfd/states/23/23029.html>).

XVIII. Miscellaneous

Comment. According to MAA, our reference to mercury loading in chapter 3 (p. 3-12) is not substantiated.

Response. We acknowledge the inaccuracy of that statement; and, we will correct it in the final EIS and CCP. Although several studies have documented elevated levels of PCBs and other organochlorines in pen-raised fish, we are not aware of any studies that reported elevated levels of mercury in aquaculture fish.

Comment. The Sierra Club, The Wilderness Society, and one individual recommend that our plan address inventory and monitoring of water quality in more detail to benefit habitat quality for aquatic species and important wetlands habitats.

Response. Chapter 3 summarizes our concerns about water quality in coastal Maine. Assessments of water quality are done primarily by two state agencies: the Department of Marine Resources and the Department of Environmental Protection. The Maine State Planning Office published a report titled “Marine Monitoring Programs in the Gulf of Maine: An Inventory” (June 2001), which provides a good overview of monitoring water quality in coastal waters (www.gulfofmaine.org/library). We will continue to work with those agencies to address water quality concerns that affect or are affected by refuge resources.

Comment. The Wilderness Society expressed concern over the lack of detailed information on air quality, and recommended our plan address inventory and monitoring of air quality in more detail.

Response. Both state and federal agencies monitor air quality in response to state and federal requirements. In the vicinity of the refuge, we are aware of air quality monitoring stations at Moosehorn Refuge and Acadia National Park. We will rely on those sources for information on air quality impacts in coastal Maine. Chapter 4 describes how our activities may affect air quality, and how we attempt to minimize any negative impacts.

Comment. MAA notes that the “Literature Cited” section of our plan did not list three of its references in text: on page 2-102, Kellog, 1982 and Yesner, 1980, and on page 3-76, Famous 1991.

Response. We inadvertently omitted them, but have included them in this final EIS in “Literature Cited.”

