

Appendix K: Response to Comments on the Draft CCP

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Wildlife

Comment: If the primary benefit of the Refuge is for migrating waterfowl, is 1,000 acres of crops enough to attract them?

Response: The Refuge was established under the authority of the Emergency Wetlands Resources Act and derives its purpose from that law and others. The Refuge purposes are stated on page 4 of the Draft Comprehensive Conservation Plan and include conservation of wetlands, and providing for migratory birds and other fish and wildlife. This broader purpose requires a greater diversity of habitats to meet that purpose. Migrating waterfowl and other water birds are attracted to crop fields, but moist soil habitat and a mosaic of forested and non-forested wetlands (as described on page 70 of the Draft CCP) are also valuable habitats, providing food, water and resting areas.

Condemnation Concerns

Comment: An individual voiced opposition to the use of condemnation, also called eminent domain, to acquire land for the Refuge.

Response: The U.S. Fish & Wildlife Service has no plans to acquire land through condemnation. All land acquisition that has occurred for Patoka River NWR & MA has been from willing sellers and all that is proposed in the future would be from willing sellers.

If it seems like land acquisition is a major focus of the Patoka River NWR & MA, it's because the Refuge is still young. Approximately one-quarter of the total area approved for acquisition is currently part of the Refuge, and because the Service buys from willing sellers, the land it has acquired includes numerous, unconnected tracts. To fulfill the purposes the Refuge was established for, which include wetland conservation and providing habitat for waterfowl, other migratory birds, endangered species and resident wildlife, a refuge needs a contiguous land base. As the Refuge gradually acquires land, the emphasis will shift from acquisition to various management and restoration projects.

Opposed to Land Acquisition

Comment: The Refuge should not acquire additional lands because there is already sufficient acreage and public ownership adversely affects neighboring private land owners.

Response: The size and location of the refuge in southwestern Indiana was determined after long and thoughtful consideration by many people in the natural resource management field. After eight years of planning and public debate, the refuge boundary was finally established and approved in 1994. It has always been acknowledged that the refuge acquisition program would take decades based on buying land from willing sellers. As the population grows, more and more land will be developed for housing, industry, agriculture and transportation. Once completed, the refuge will come to be recognized as a wildlife oasis providing assurance of at least a representative sample of our natural heritage for future generations to enjoy and learn from.

The Refuge purposes are stated on page 4 of the Draft Comprehensive Conservation Plan and include conservation of wetlands, providing for migratory birds and other fish and wildlife. All other uses that occur on the Refuge must be evaluated for compatibility—that is the use must either help fulfill the Refuge purposes or, at a minimum, not detract from the purposes.

As far as maintenance and upkeep, the refuge has been actively involved with many partners in providing new facilities and habitat restoration. The refuge has planted 422,000 hardwood trees on 843 acres of acquired lands and has constructed 347 acres of manageable wetlands on the refuge through 2007. Three new boat ramps are available to the public near Pikeville, Survant and Snakey Point Marsh. A public fishing pier and walking trail is available at Snakey Point. Numerous parking areas have been provided for visitor use. We recognize that the public may get frustrated at the checkerboard ownership patterns of the refuge but that is to be expected with a willing seller only acquisition program.

The Refuge has the same obligations as any other landowner and the same rights as any other landowner. Being adjacent to or surrounded by Refuge land does not impede a landowners' rights, access, or use of property.

Land Acquisition Support

Comment: *Some individuals expressed support for continued emphasis on land acquisition, calling it the "critical piece of the puzzle" in the CCP. Others noted that there are a number of willing sellers within the approved acquisition area and that the Refuge suffers from a lack of funding to pursue those properties.*

Response: Building a refuge takes time and we truly appreciate all support for Patoka River NWR & MA. We are especially grateful to the individuals who have partnered with the refuge to help secure funding grants and to those who are making the Refuge possible by selling their land to the Service.

Annual appropriations for land acquisition on National Wildlife Refuges are made by the U.S. Congress from the Land and Water Conservation Fund (LWCF). This fund receives revenue when the U.S. Government leases offshore oil development rights and collects annual royalty payments from oil production. There is stiff competition for these funds as there are many other refuges across the United States that are also growing in size and faced with severe threats of development on those lands approved for inclusion in those refuges. Friends and supporters of refuges expressing their concerns for growth of their local refuge really do make a difference.

While some may feel that Patoka River NWR (5,946 acres) has grown too slowly especially when compared to similar refuges established in the same time period such as Canaan Valley NWR (15,901 acres) in West Virginia or Cypress Creek NWR (15,395 acres) in southern Illinois, there are some bright spots. The lack of funding support has resulted in formation of partnerships with many individuals, non-profit organizations, industry and state agencies. For example, with the help of partners, the refuge has competed for and received four North American Waterfowl Management Plan grants since 1995. These grants have provided \$1,144,500 for land acquisition plus \$294,000 for habitat restoration.

There has always been a long list of many willing sellers. The list is growing shorter as private interests and corporations continue to take advantage of the lack of regular funding from the LWCF and buy land for personal use and development from frustrated willing sellers. Too be sure, the vision for which Patoka River NWR was established is facing a long and tedious journey which only increased public support can hope to remedy.

Support of the Refuge

Comment: Many people wrote to express support for the work of Refuge staff and management of the land to benefit wildlife and wildlife habitat. Others wrote to support Alternative 3, the preferred alternative.

Response: Refuge staff and Regional Office planners appreciate your support. Many people contributed to the Comprehensive Conservation Plan by asking good questions at public meetings, reviewing the draft CCP and offering comments on the plan. We appreciate the time you have been willing to dedicate to the planning process and we appreciate your thoughts on the plan. The Patoka River NWR and MA is a unique place and we are looking forward to implementing the plan over the next 15 years.

Timber Management

Comment: *Timber Harvest should be used as a management tool to maintain age class diversity within forested portions of the Refuge.*

Response: Strategy 3 under Objective 1.1 For-ested Wetlands of the selected alternative calls for completion of a Habitat Management Plan with specific management recommendations to maintain bottomland forest species and age class diversity. The Habitat Management Plan is more site specific than the CCP and will consider various management options including timber harvesting.

Anyone familiar with the history of land use practices in the Patoka River bottoms recognizes that the timber resource has been high-graded for over a century with more valuable timber species being continuously cut and removed from the forest stand. With the past emphasis on clearing and draining to make more land available for agriculture, little effort was ever expended to manage the composition of the forest. Whatever grew back, grew back on its own. This meant that mast producing trees includ-

ing many species of oaks, hickories and pecans were repeatedly cut out until the seed source for natural regeneration became limited. Lighter seeded species such as silver maple, cottonwood and green ash came to dominate the forest composition.

As the refuge acquires more of the bottomland acreage, a Habitat Management Plan will be prepared to address future timber management with a goal of increasing species diversity. This would likely be done by interplanting numerous species of oaks and other mast producing species in the understory and then conducting timber sales for selective cutting of soft hardwoods mentioned above. This would provide daylight to jumpstart the previously planted oak seedlings and better enable them to compete for a place in the new forest stand.

Present refuge reforestation efforts have focused on restoring a diversity of timber species on bottomland cropland areas with a history of flooding and crop loss. One of the goals identified in the Concept Refuge Management Plan that was part of the approved Environmental Impact Statement in 1994, was to reestablish a continuous forested corridor along all 30 miles of the Patoka River channel within the refuge boundary. Most of the 843 acres planted to date have been in the river bottoms.

Sanctuary: Move It Around

Comment: *Some people believe that sanctuary areas like the Cane Ridge Wildlife Management Area exclude public hunting and benefit adjoining private land owners. They say that sanctuary areas should be located in close proximity to areas where public hunting is allowed and be rotated to different locations periodically.*

Response: Sanctuary areas – locations where wildlife, especially migratory waterfowl, are not hunted – are known to benefit both wildlife and hunters. The strategy under *Objective 3.2 Hunting* of the selected alternative calls for establishing sanctuary areas as more land is acquired. It is likely that these areas would be rotated to different locations periodically. The 488-acre Cane Ridge Wildlife Management Unit is closed to hunting. The original intent of the Cane Ridge property was to provide an area where waterfowl could feed and rest without disturbance from hunting. There are no other sanctuaries on public lands in the vicinity and although adjoining landowners do benefit from its proximity the ducks found at Cane Ridge are known to spend time at other hunted areas including Oatsville Bot-

toms of the Patoka River NWR. Also, the Indiana Department of Natural Resources recently purchased 840 acres adjacent to Cane Ridge WMA. This property known as Tern Bar Slough Wildlife Diversity Area is scheduled to have managed waterfowl hunting beginning in 2010.

Sanctuary: The Refuge Should Protect Wildlife From Hunting and Fishing

Comment: *Some people said that refuges are “useless” if wildlife is “harassed” by anglers and hunters, and asked that Patoka River NWR establish “plenty of sanctuary” for wildlife.*

Response: The National Wildlife Refuge Improvement Act of 1997 established six priority wildlife-dependent public uses on refuges. These six uses are: hunting, fishing, wildlife observation, wildlife photography, environmental interpretation and environmental education. Refuges are required to evaluate the potential for these six public uses and, if they are not appropriate on the refuge, give good reason why they are not appropriate. For example, on Agassiz National Wildlife Refuge in northern Minnesota, moose hunting has been deemed not compatible in response to a declining moose population. Some permits will be issued if moose rebound sufficiently, but otherwise moose hunting will not be allowed.

If providing habitat achieves what the Service wants to achieve, namely healthy and abundant populations of diverse wildlife species, hunting and fishing will not have harmful effects on the population as a whole. In fact, hunting and fishing contribute to improving the overall health of a species and habitat by maintaining sustainable populations of wildlife. For example, when there are too many deer for habitat to support, deer will overbrowse the understory vegetation and eliminate most of the tree seedlings and broadleaf plants. This affects forest regeneration and has long-term negative consequences on habitat and other species of wildlife. Wildlife also becomes more susceptible to disease when the number of animals exceeds the natural food supply. A healthy population of animals is dependent on a healthy habitat which means the food supply is adequate for all.

Disturbance of wildlife is a topic we consider before permitting activities on the Refuge. Compatibility determinations that include anticipated impacts of each public use were included in Appen-

dix F of the Draft CCP and Environmental Assessment. Also, the selected alternative includes a strategy under *Objective 3.2 Hunting* that calls for additional sanctuary areas as more land is acquired.

Economic Concerns

Comment: One individual wondered whether it was cost effective to plant trees in areas prone to beaver caused flooding.

Response: Prolonged flooding whether caused by beavers or other sources is one of the challenges to restoring bottomland forest. In some cases planted trees are lost to flooding, despite this, planting is the most effective means of restoring tree species reduced or eliminated from bottomland forests by previous land use practices. Restoring native habitat is part of the National Wildlife Refuge System mission and is supported by other Service policies. Beavers are native to forested wetlands like those along the Patoka River and beaver-caused disturbance is part of the bottomland forest system. Nearly every location along the Patoka River is potentially subject to beaver activity as well as prolonged flooding caused by other factors within the Patoka River watershed. Restoring such sites sometimes results in additional costs if replanting is deemed necessary rather than relying on natural succession of vegetative communities following beaver or other flooding disturbances

Support for Alternative 3

Comment: The Refuge received several comments supporting Alternative 3 of the Draft Environmental Assessment.

Response: We appreciate support for the preferred alternative, and we appreciate all of the time and thought that people devoted to the CCP.

Hunting Support

Comment: Hunting is a safe activity that should always be emphasized and expressed at every opportunity when the subject of hunting comes up in the future.

Response: Hunting is one of the six priority wildlife-dependent public uses identified in the National Wildlife Refuge Improvement Act of 1997. Refuges evaluate whether wildlife populations are sufficient to support hunting and whether there is enough space for hunters to have a positive and safe experi-

ence. Presently, all but 606 acres of the more than 6,000 acres of Refuge lands are open to hunting consistent with Indiana DNR regulations.

Public Use

Comment: We heard from individuals who are interested in more public access to the Refuge and the Patoka River, individuals who are concerned that the sound of traffic and conflicts with other Refuge uses are diminishing visits for birders and hikers, and an individual who would like to see a step-down plan for ATV use on the Refuge.

Response: Public access at Patoka River NWR & MA is limited by how much land the Refuge has acquired and the location of that land. In some cases, public access isn't feasible because the land owned by the Refuge is surrounded by private land. In other cases, a tract might be too small to accommodate visitors pursuing different interests. We want visitors to have as much access to the Refuge as possible without compromising wildlife needs, and we want those visits to be satisfying. We expect public access and the overall visitor experience to improve as the Refuge grows.

The Service is developing regulations to govern Off-Road Vehicle (ORV) use on national wildlife refuges. No new ORV use is authorized until the regulations are complete and Service policy is revised. Off-Road Vehicles including All-Terrain Vehicles are prohibited on the Refuge and there are no plans to change this. Any use permitted on a National Wildlife Refuge must pass two separate tests. The first test is to determine if the use is appropriate and the second is to determine if the use is compatible with the purposes for which the refuge was established. The terms "appropriate" and "compatible" and the associated processes are defined in Service policies.

Public Use Regulations

Comment: One individual suggested decreasing the intensity of hunting to provide wildlife relief from hunting pressure and that any such change should be done with public involvement.

Response: Strategy 4 under Objective 3.2 Hunting of the selected alternative calls for identifying sanctuary areas – places where hunting is prohibited – once more land is acquired. This would be done as part of developing a Hunting and Fishing Plan for the Refuge and would include public review.

Comment: One individual suggested implementing a no hunting safety zone where Refuge and private lands border.

Response: Hunting is permitted on specified Refuge lands in accordance with State laws and regulations. Any current or future State regulations governing hunting and firearms are enforced by Indiana Department of Natural Resources Conservation Officers.

Comment: One individual opposed the use of Off Road Vehicles on Refuge lands.

Response: Off-Road Vehicles including All-Terrain Vehicles are prohibited on the Refuge and there are no plans to change this.

Suggested Edits

Comment: One individual suggested modifying the section on Potential Refuge Visitors to highlight air quality as an important factor affecting Refuge visitation.

Response: We made no change to the section on Potential Refuge Visitors. We feel the section entitled Air Quality adequately covers the subject.

Comment: One individual suggested that not all partners were listed in the section entitled Existing Partnerships.

Response: We reviewed the list and feel it reflects the range of existing partners. We expect our list of partners to grow over the 15 year period covered by the CCP.

Comment: One individual commented that Ruffed Grouse populations are at low levels because of a lack of young forest habitat.

Response: We added a sentence to the section entitled *Fish and Wildlife Communities* to note this change.

Comment: One individual commented that local place names used in the text do not appear on the maps.

Response: We agree and have added a number of place names to Figure 11 Current Visitor Facilities.

Comment: One individual commented that Appendix B should be modified to show Snowy Egret as occurring at Patoka River NWR as well as Cane Ridge WMA.

Response: We made the change to Appendix B.

Comment: One individual felt the amount of waterfowl noted in the section entitled *Fish and Wildlife Communities* (5,000 to 8,000) is too low and should be increased to 15,000 to 20,000.

Response: We reviewed the section and believe it is accurate as stated. The numbers in question are referencing average fall/winter waterfowl numbers not peak numbers.

Comment: One individual noted that the scientific name of broadleaf uniola had changed.

Response: We made the correction to Appendix C.

Comment: One individual noted that the AB Brown power plant was not listed in the section on Air Quality.

Response: The paragraph in question lists several power plants as examples (one in each direction from the Refuge), but it is not intended to be a comprehensive list.

Comment: One individual commented that under the section entitled *Socioeconomic Setting* that Gibson county should be described as one of the fastest growing counties in Indiana.

Response: We reviewed the section, and although some of the Census figures may be dated, it is generally accurate. The local area has grown in population and economic activity, but much of that growth occurred in adjoining counties.

Contaminants/Air and Water Quality/ Refuge Threats

Comment: One commenter suggested the Refuge should monitor local air quality and work to maintain air quality standards.

Response: We added an objective statement and strategies regarding Air Quality to the CCP and revised the Environmental Assessment to account for this change. Air quality was not identified as a planning issue during the initial scoping phase of the process and was not included in the Draft CCP/EA. It became an issue in the later stages of the planning process largely because of a proposal to site an industrial facility on lands near the Refuge. Service policy directs Refuge Managers to maintain and where feasible restore the environmental health of the Refuge, this includes air quality. As documented in the CCP and EA the Refuge continues to work

with the Indiana Department of Environmental Management to develop air quality monitoring near the Refuge.

Comment: *One commenter suggested the Refuge should monitor proposals for nearby industrial, commercial and residential facilities and communicate concerns regarding any actions that may disturb any of the sites identified under the Comprehensive Environmental Response and Compensation Liability Inventory System (CERCLIS) or other contaminant sites. The commenter also suggested that the Refuge identify evacuation distances for local industrial sitings to better understand the potential hazards posed by these sites, and communicate any concerns to the Indiana Department of Environmental Management.*

Response: We have and continue to monitor off site development proposals as we become aware of them. We work in conjunction with the Service's Environmental Contaminants Program which is dedicated to identifying sources of environmental contamination, assessing impacts of contaminants to fish and wildlife resources, and helping to restore contaminated habitats. If there is potential for any proposed development to affect Refuge resources we communicate our concerns to the appropriate authority or regulating body.

There are a number of methods the Service employs to identify and deal with contaminants. First, contaminant surveys are mandatory prior to the acquisition of any Refuge lands. A preacquisition survey was conducted in 1989 for the Refuge. Second, the Environmental Contaminants Program also conducts the Contaminants Assessment Process (CAP). This is a standardized and comprehensive approach used to assess potential threats posed by environmental contaminants to National Wildlife Refuges as well as other Service lands. The CAP process involves reviewing information available on the ecological and physical characteristics of the Service land and surrounding area relative to possible contaminant issues.

This review requires the primary investigator to compile and interpret information acquired from various sources. To facilitate the investigation, the Service's Division of Environmental Contaminants and the U.S. Geological Survey, Biological Resource Division's Biomonitoring of Environmental Status and Trends (BEST) Program jointly developed a data management system. The system retrieves and organizes information from contaminants-related, on-line databases maintained by the Environmental

Protection Agency (EPA). In addition, the CAP requires that the Primary Investigator acquire data from other sources including interviews with refuge managers, biologists and various experts as well as scientific literature. Potential point and nonpoint contaminant sources and types are inventoried and pathways that these contaminants may follow to reach the area of concern are identified. Then, areas of potential contamination are identified and the contaminant issues described. The information summarized through the CAP can provide the basis by which land managers select options to reduce contaminant impacts on the species and lands under their stewardship. The CAP also identifies Service-managed areas located downstream or down-gradient from highways, railways, or navigation channels that may be vulnerable to hazardous substance spills. Such areas may then be targeted for baseline data collection which could support future on-Refuge investigations, natural resource damage assessments, or field work.

Finally, if a contaminant problem is suspected, the Environmental Contaminants Program can conduct further studies to help identify the cause as well as potential solutions. A number of such studies conducted on and around the Refuge have helped guide past contaminant remediation efforts related to abandoned oil wells and acid mine drainage.

Comment: *One commenter noted that pollution problems associated with farming, mining, and sewage have improved through the efforts of Refuge staff.*

Response: Thank you for the comment. We believe our efforts in conjunction with our partners have reduced pollutants within the Patoka River watershed.

Comment: *One individual supported banning Off Road Vehicles, mining, power plant development and the construction of Interstate 69 within 10 miles of the Refuge to protect sensitive habitat.*

Response: The Refuge has no authority to ban activities, including Off Road Vehicles (ORVs), mining, power plant development, and construction of Interstate 69 on lands not under Refuge ownership. Presently, Off Road Vehicles are prohibited on Patoka River NWR lands and there are no plans to change this. In March 2004, after extensive public involvement and analysis, the Federal Highway Administration issued a Record of Decision that selected an alternative that will cross within the

Refuge acquisition boundary, but not on lands owned by the Refuge. The Refuge participated in the process and obtained a number of mitigating measures to protect Refuge resources. These items are noted in Chapter 3 of the Comprehensive Conservation Plan under the heading *Interstate 69*.

Comment: *One commenter recommended the Refuge request the Environmental Protection Agency exercise its oversight authority and give considerable attention to environmental and economic effects with respect to permits that come before the Indiana Department of Environmental Management.*

Response: We continue to work with the Indiana Department of Environmental Management and the Environmental Protection Agency to identify and mitigate potential threats to Refuge resources. This includes providing relevant data to be used in the permitting process.

Comment: *One commenter recommended the Refuge study the hydrology of the surrounding watershed to determine ground and surface water relationships and use the results to determine if existing State water quality standards are sufficient to achieve Refuge objectives.*

Response: Most of the water quality issues within the Patoka River watershed are a result of crude oil extraction and surface coal mining that occurred prior to the 1977 Surface Mining Control and Reclamation Act. Past clean up efforts have succeeded in part because they were preceded by studies to gather sufficient information. Existing water quality regulations have helped in clean up efforts to date and we have no reason to believe they would not be adequate to achieve the desired on-Refuge conditions included in the selected alternative.

Environmental Education

Comment: *Two readers voiced support for more environmental education on the Refuge. One reader specified environmental education for local children who are currently going to Evansville to experience bottomland hardwood forests, and another reader suggested that environmental education programs would result in people having more commitment to land stewardship and not littering when they visit.*

Response: We believe that environmental education is essential to teaching children about this country's magnificent natural resources and making people more aware of good land stewardship. We

are pleased to see support for the Refuge playing a role in local environmental education. As a young Refuge with a small staff, our ability to offer environmental education programs is limited right now. As the Refuge acquires land, staff, and basic outdoor learning facilities, we will be in a better position to support environmental education efforts by local educators.

Refuge Funding/Staffing

Comment: *Some people said that the CCP is too optimistic about future funding for land acquisition and staffing.*

Response: The CCP is a 15-year plan, and we believe that our objectives and strategies are achievable in that timeframe. In terms of positions, the Refuge would gain one full-time position (a wildlife biologist or a forester) over the next 15 years. To date we have acquired one-fourth of the approved acquisition area; our objective is to acquire 50 percent within 5 years, 70 percent within 10 years, and 80 percent within 15 years. Achieving that objective depends on the availability of funding and willing sellers, and we recognize that both are hard to predict.

Patoka River Oxbow Restoration

Comment: *Restoring the Patoka River would have adverse effects on flood control, local economies, and private property.*

Response: *Objective 1.4 Patoka River, Oxbows, and Patoka Tributaries* of the selected alternative calls for collecting information necessary to evaluate stream channel restoration options for the Patoka River. Based on the results of this evaluation, it may result in an additional proposal for river channel restoration. Public involvement and review along with an analysis of potential impacts would accompany any such proposal.

Support for Alternative 1: Current Management Direction (No Action)

Comment: *Some individuals commented that they support Alternative 1 as the preferred alternative in the Draft Environmental Assessment.*

Response: We appreciate support for the Refuge's work to improve bottomland hardwood forest and other habitats. We identified Alternative 3: Inten-

sive Habitat Management and Active Visitor Services, as the preferred alternative because we think it is a better route for continuing to improve habitat and contribute to healthy populations of resident and migratory wildlife.

Visitor Center

Comment: *The plan should include provisions to construct a Visitor Center for the Refuge or at least an expansion of the existing space to provide interpretive and outreach materials.*

Response: We added a strategy to Objective 3.5 Interpretation to provide for development of a visitor contact area as necessary and feasible. We did discuss the possibility of a Visitor Center for the Refuge during the planning process, but did not develop a proposal. This should have been noted in the Environmental Assessment but was not. We added this information to the section of the Environmental Assessment entitled *Alternatives Considered But Not Developed*. Visitor Centers represent substantial capital investments and require subsequent monies for maintenance and upkeep. The Service considers a number of factors before proceeding with any new facilities. Presently, the patchwork ownership pattern and visitation levels do not support the addition of a Visitor Center at Patoka River NWR. The primary focus of the CCP over the next 15 years is on acquiring additional lands which is likely to attract additional visitors.

Trespassing

Comment: *An individual commented that he or she has signed the boundaries of his or her property and since then has not experienced problems with Refuge visitors trespassing.*

Response: Refuge staff are always very pleased when visitors are not causing conflicts with neighbors, and we applaud the writer for taking the initiative to post the boundaries. We also know that the Refuge has a responsibility to do what it can to help visitors navigate the Refuge without trespassing on private property, and the CCP calls for greater emphasis on posting the boundaries.

Public Notification

Comment: *One commenter indicated that although they were affected by the plan, they were not directly contacted for comment.*

Response: We apologize for this oversight. Our intent was to notify all those interested or affected by the CCP planning effort, but unfortunately we did not make direct contact with everyone. The draft CCP/EA, a summary, and/or a compact disc was sent to 416 members of the public; organizations; local, State, and Federal agencies; elected officials; and public libraries. The draft CCP/EA was also available online at the Region 3 Conservation Planning website. The comment period began on October 17, 2007 and lasted 45 days. During the comment period we held an open house meeting that was publicized through the local media.

Paper Waste

Comment: *One writer protested the "paper wasted" and the printing costs associated with providing people with a copy of the Draft CCP.*

Response: Although the Refuge and the entire U.S. Fish & Wildlife Service would very much like to reduce both paper use and printing costs, we have an obligation to make Refuge planning as open as possible. That means providing updates on the planning process and, ultimately, a draft CCP for people to review. We distribute draft CCPs in three ways: we print copies and mail them to individuals who have indicated an interest in receiving one as well as to local libraries; we mail the CCP in electronic format on a compact disk; and we post the CCP on the Division of Comprehensive Conservation Planning website.

Planning staff regularly discuss ways we might reduce printing costs and our use of paper, and we expect that in the future we will rely less on printed copies and more on making documents available electronically and on the Web. In the time being, we believe that computer use is not convenient enough or widespread enough among all demographic groups for us to quit printing paper copies of CCPs.