UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF THE
REGIONAL ADMINISTRATOR

November 10, 2015

Wendi Weber, Regional Director, Region 5
USFWS Public Comments Processing
Attn: FWS-R5-NMRS-2015-0036
MS: BPHC; 5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Silvio O. Conte National Fish and Wildlife Refuge (NFWR) draft comprehensive conservation plan (CCP) and Environmental Impact Statement, Connecticut, Massachusetts, New Hampshire, and Vermont, CEQ File # 20150238

Dear Ms. Weber:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, we have reviewed the Fish and Wildlife Service (FWS) Draft Environmental Impact Statement (DEIS) for the Silvio O. Conte National Fish and Wildlife Refuge (NFWR) in Connecticut, Massachusetts, New Hampshire, and Vermont. The CCP and DEIS analyze alternatives for management of the 35, 989 acre refuge for the next 15 years.

Based on our review of the DEIS we offer the following comment related to the discussion of climate change. The DEIS discusses ongoing and projected climate change in the "Affected Environment" section and considers climate change adaptation in analyzing alternatives, consistent with CEQ's draft climate change guidance. The DEIS relies on a 2006 regional study by the Union of Concerned Scientists and the 2007 Intergovernmental Panel on Climate Change report to identify climate change impacts and, among other things, emphasizes that improving habitat connectivity should promote resilience in the face of those impacts. Should the FWS decide that a more in-depth analysis in the FEIS is appropriate we suggest the FWS also consider the relevant work of the U.S. Global Change Research Program 2014 National Climate Assessment, including the chapters on regional impacts, coastal issues, and adaptation. We believe it may also be appropriate for the FEIS to consider the National Fish, Wildlife, and Plants Climate Adaptation Strategy, as well as the 2014 report, "Climate Smart Conservation: Putting Adaptation Principles Into Practice." Finally, the NatureServe Climate Change Vulnerability Index for individual animals and plants may provide useful information for further identifying priority conservation areas, among other things.

EPA has no objections to the project as proposed and has rated the DEIS "LO-1" (Lack of Objections-Adequate) in accordance with EPA's national rating system, a description of which is enclosed. Please feel free to contact me at 617/918-1025 if you have any questions.

Sincerely,

Timothy Timmermann
Associate Director, Office of Environmental Review

Enclosure

Summary of Rating Definitions and Follow-up Action
Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.