

## TOWN OF CHINCOTEAGUE, INC

October 8, 2015

Wendi Weber, Regional Director and Scott Kahan, Regional Chief/National Wildlife Refuge System US Department of Interior, Fish and Wildlife Service 300 Westgate Center Drive Hadley, MA 01035-9589

RE: Review of the Final CCP/EIS for Chincoteague NWR

Dear Ms. Weber and Mr. Kahan:

A short 30 day review of the Final Comprehensive Conservation Plan (CCP) for Chincoteague National Wildlife Refuge brings an end to a 5 year long planning process. On many important points, the plan is responsive to concerns raised by the Town of Chincoteague and is a much better document following your work this year. Thank you.

The Final CCP/EIS however stopped short of meeting our concern for resiliency and flood protection along the entire 17 miles of Assateague Island in Virginia. The wording in the final CCP draft that states "The USFWS is committed to exploring the implementation of resiliency strategies informed by the latest science available" is lacking in a commitment.

USFWS intends to address coastal resiliency on the Eastern Shore of Virginia through the Mid-Atlantic Coastal Resiliency Institute (MACRI) which excludes the Town of Chincoteague, Accomack County and Northampton County from participation. This solution does not adequately protect the public health, safety and welfare of the Chincoteague Island community.

The Final CCP/EIS still proposes to use the NEPA review process to manage the important work ahead that would plan/design/permit/build a new sustainable and resilient recreational beach by completing a limited and superficial Environmental Assessment. This process has not worked well to allow community participation or to accomplish the needed study. A better management plan is needed.

The Final CCP/EIS defers consideration of the adverse Cumulative Impacts of FWS management actions which are both specific and predictable to make it the responsibility of other federal agencies at some point in the future. The impacts of wildlife management strategies on the southern end of Assateague Island have still not been evaluated.

The Final CCP/EIS was written to support the relocation of the recreational beach under all alternatives as the final outcome before the NEPA document was even prepared. Alternative B is proposed without preparing the necessary documents or detail to allow for community support.

It is important however, that we as a community and as a nation continue to invest in these treasured public lands. On this basis, if you select Alternative B as the best option presented for the Final Comprehensive Conservation Plan at Chincoteague National Wildlife Refuge, then our community requests that these outstanding issues be carried forward under future NEPA reviews, and that long term planning for the recreational beach relocation will be completed under a full EIS and MOU as stated in our letter dated August 18, 2015 with all stakeholders at every meeting.

Not knowing the length of time or the final cost of such a project, we would also request a stronger commitment to protect the parking at its current location until such a time everyone is in agreement that all the issues have been addressed and the land base at the current beach parking location is no longer sustainable.

Sincerely,

John H. Tarr

Mayor

cc: Town Council

Honorable Robert Bloxom Honorable Lynwood Lewis Honorable Terry McAuliffe Honorable Mark Warner Honorable Tim Kaine Honorable Scott Rigell