



## **Appendix K**

### **Comments on the Draft Comprehensive Conservation Plan and Environmental Assessment**

*This appendix is a record of the written comments the Service received on the Draft Comprehensive Conservation Plan and Environmental Assessment (DCCP/EA) made available to the public and affiliated agencies for review and comment.*

*Over 200 copies of the DCCP/EA were mailed to those listed in Appendix H and to individuals responding to news releases announcing the draft's availability; multiple copies were sent to several of the listed offices.*

*An Open House for the public to come and visit with Service staff on the proposed plan or to review the plan itself, was held September 7, 2000, from 1:00 p.m. to 8:00 p.m. at the DeSoto NWR Visitor Center. Fourteen people came and of those, four left written comments. Thirteen comment were received by mail. Those comments and the Open House attendance list are presented on the following pages. The Service's response to all these comments are summarized at the end of Chapter 2 of the CCP.*



**Attendance Sheet**  
**DeSoto CCP Open House**  
**September 7, 2000**

<u>Name</u>	<u>Address</u>	<u>City, State, Zip</u>	<u>Phone</u>
Anne Carson	10964 Lariat Lane	Blair, NE 68008	426-0468
Ruth Stroud	10964 Lariat Lane	Blair, NE 68008	426-0468
Gene Beranch	29685 170th	Honey Creek, IA	
George Oliver	314 E. 8th	Logan, IA	644-3799
Brent Olson	P.O. Box 158	Pisgah, IA	456-2924
Dave Borgca	3117 Monroe St.	Omaha, NE	614-1772
Gene Burke	7126 N 7 <sup>th</sup> Ave.	Phoenix, AZ	(602)371-8634
Bill Burke	17857 Badger Ave	Crescent, IA 51526	
Helen Burke	17857 Badger Ave	Crescent, IA 51526	
Mary Klimek	2271 Liberty Ave	Mo. Valley, IA 51555	642-5082
Ken & Bonnie Jensen	2915 Westridge Dr	Blair, NE 68008	(402)533-2065
Hank & Betty Marquardt	1903 Highway 30	Mo. Valley, IA 51555	642-2809



### **Comment No. 1**

Suggestions:

1. Extend public use season — open sooner and close later. Winter and spring fishing should be allowed.
2. Realign auto tour route to include road along river as far as the south boat ramps.
3. Leave enough cropland near auto tour route to be attractive to deer, turkey, etc..
4. Open auto routes so eagles can be seen at south end from far side of the lake.

/s/ Anne Larson  
Blair, NE

### **Comment No. 2**

Open the entire blacktop levee road year-round. (Along the river to the south end.) More people would use the refuge if the road was open more.

No name on the comment.

### **Comment No. 3**

- Re-pave roads on refuge
- When reducing farm acres and converting to prairie seedings with grasses and forbs begin a seed harvesting system to help other organizations (i.e., DNR, PF, CCB, etc.)
- Set up demonstration and experiment areas in the cottonwood bottomland timber sites working with your local foresters to set them. Inventory sites.
- Maps look great.
- Allow recreational mushroom hunters, but enforce strongly illegal and commercialization activities of mushroom hunters.

/s/ Brent Olson  
Pisgah, IA



#### **Comment No.4**

I would favor Alternative D. If this occurs you should start opening up some land to upland bird hunting and more public use.

This would not negatively affect either the deer or upland game. To the contrary it would aid both birds and deer. It is not necessary to grow crops for wildlife. What is needed is more HABITAT.

It would also be beneficial to all outdoor people to get Neb. and Iowa to have reciprocal hunting privilege on DNWR land subject to usual regulations of each state. This would aid law enforcement of each parcel better than is now available.

/s/ Eugene F. Beranch  
Honey Creek, Iowa

#### **Comment No. 5**

The following comment was received by mail:

(Re-typed as accurately as possible to improve legibility.)

*Sept.15/2000*

*Dear Senator Grassly:*

*I just finished reading this article in my Democrat. I did not know of the meeting in Missouri Valley or I would have attended it*

*If this plan entails of opening the Missouri river, as the way it was before the 1952 flood, I speak in a very negative attitude.*

*That year, in April, the river flooded all the bottom land from the river to the Loess hills. The water was up to the top of the wainscoting in all our houses in Blencoe.*

*Millions & millions of dollars have been spent so as to make our land productive. My farm borders the Missouri river and is one of the most productive in Monona County.*

*In 965 I was confronted by the wildlife committee to sell or give DNR 5 acres to make a recreation park; which I did.*

*Now it seems all this is being turned back for wildlife.*

*The Loess Hills has ponds and low places for wildlife and consists of acres and acres of unproductive land.*

*I am definitely against this.*

*Sincerely*

*/s/ Ethel Huff*

*Box 164, Blencoe, Ia.*

*Phone - 712-642-2086*

/s/ Ethel Huff  
Blencoe, Iowa



## Letters from Agencies and Organizations



NEBRASKA STATE HISTORICAL SOCIETY  
1500 R STREET, P.O. BOX 82554, LINCOLN, NE 68501-2554  
(402) 471-3270 Fax: (402) 471-3100 1-800-833-6747 [www.nebraskahistory.org](http://www.nebraskahistory.org)

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September 8, 2000

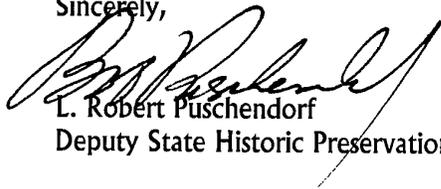
Mr. Jim Salyer  
US Fish & Wildlife Service  
Southern Missouri Ascertainment Office  
24385 State Highway 51  
Puxico, MO 63960

RE: draft Comprehensive Conservation Plan and  
Environmental Assessment for the DeSoto National Wildlife Refuge  
HP #0008-108-01

Dear Mr. Salyer:

We have reviewed the proposed project and have no objections to the plans as they are presented at this time. If there are any changes, please notify our office. Thank you for your cooperation.

Sincerely,



L. Robert Puschendorf  
Deputy State Historic Preservation Officer

NOB



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September 15, 2000

Mr. Jim Salyer  
U.S. Fish and Wildlife Service  
Southern Missouri Ascertainment Office  
243485 State Highway 51  
Puxico, Missouri 63960

**Re: Draft Comprehensive Conservation Plan and Environmental Assessment for the DeSoto National Wildlife Refuge**

To the Planning Team:

On behalf of the 85,000 national members and supporters of the Animal Protection Institute, we thank you for the opportunity to comment on the Revised Draft Comprehensive Conservation Plan (DCCP) and Environmental Assessment for the DeSoto National Wildlife Refuge.

Our organizations are very concerned that management of National Wildlife Refuges (NWRs) has strayed far from Theodore Roosevelt's original intent of protecting public lands to provide sanctuaries for wildlife. Many refuges now allow, and even encourage, activities detrimental to wildlife, including hunting, fishing, trapping, motor boating, and jet skiing. In many instances these recreational uses are permitted in the absence of thorough and accurate biological data on the species inhabiting and migrating through the refuge. However, the 1997 Refuge Improvement Act (Act), while upgrading detrimental wildlife-dependent activities of hunting and fishing to priority uses, more importantly requires refuges to conduct rigorous scientific research into the status of refuge wildlife populations. We hope the U.S. Fish and Wildlife Service will use this organic act to significantly improve management of our nation's NWRs and restore this public land system to its original purpose of providing a safe haven for wildlife.

Our organizations support many of the goals put forth in the DCCP, including the protection and restoration of native habitats. While we agree with the intent Alternative B – Historical Habitat Restoration, we are unable to support the Proposed Action because: 1) biological data required by the Act has not been included for all species, especially those potentially affected by recreation or habitat management; and 2) we oppose the continued emphasis on consumptive use activities, including hunting and fishing. We discuss these points in detail below.



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### **LACK OF WILDLIFE POPULATION DATA IN THE DCCP**

The Act mandates that the U.S. Fish and Wildlife Service (FWS) maintain the *biological integrity, diversity and environmental health* of the Refuge System, and that these concepts must guide decisions on all activities at all refuges.

*In developing each comprehensive conservation plan under this subsection for a planning unit, the Secretary, acting through the Director, shall identify and describe ... the distribution, migration patterns, and abundance of fish, wildlife, and plant populations and related habitats within the planning unit- Section 7(c)(2)(B)*

While some population data are included in the DCCP, there is a lack of specific biological information on many wildlife populations, including the species targeted by trapping programs. The Act mandates such information be included in the CCP. We therefore request that the FWS prepare another Draft CCP with this information, to allow the public time to assess the status of wildlife populations on the refuge complex and consider the impacts of the proposed activities on these populations.

*Refuge managers often lack adequate scientific data on the effects of public uses on wildlife populations. There is a need to determine 'thresholds' of public use (types and intensity) that can be allowed without adverse effects on wildlife populations. Thresholds for different types of activities could be used to make compatibility determinations that balance wildlife needs and human use needs. (Fulfilling the Promise: Serving Wildlife, Habitat and People through Effective Leadership 2<sup>nd</sup> Draft, September 18, 1998: p. 17)*

In their publication, *Science-Based Stewardship: Recommendations for Implementing the National Wildlife Refuge System Improvement Act*, Defenders of Wildlife reported on the recommendations of six distinguished scientists for implementation of the Act. These experts suggested a standardized sequence for refuge planning: Biological Inventory→Identification of Plan Goals→Identification of Threats→Choice of Focal Species→Comprehensive Conservation Plan→Monitoring and Implementation→Plan Amendment (according to monitoring results).

They further recommended several steps for implementing a biological inventory:

1. Given the unfeasibility of conducting an inventory for all organisms on a refuge, conduct refuge inventories to obtain, at a minimum, information on the abundance and distribution of vascular plants, vertebrates and all federally threatened and endangered species.
2. In collaboration with the U.S. Geological Survey's Biological Resources Division (BRD) biologists and other scientists, choose "focal" species suitable for monitoring on each refuge or refuge complex. Carefully chosen focal species will convey information about the status of the larger ecological system to which they belong and the integrity of specific habitats or ecosystem processes.
3. Conduct research designed to test whether each focal species does indeed provide information on larger communities and processes. This is essential to the focal species approach.
4. Select focal species and design the monitoring program for each refuge or refuge complex to produce information about internal and external threats to achieving refuge management goals. Management goals should be consistent with maintaining the biological integrity, diversity and



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environmental health of each refuge and should be clearly described in the refuge's comprehensive conservation plan.

5. Conduct rigorous, quantitative monitoring that is oriented toward management decisions to ensure that refuge management is scientifically based and as effective as it can be.

We believe these recommendations provide an excellent framework for complying with the letter and intent of the Act.

We strongly suggest that the U.S. Fish and Wildlife Service complete these steps before completing the CCP for the DeSoto National Wildlife Refuge and that it withhold final compatibility determinations until population information is presented and analyzed. To do otherwise may be in violation of the Act.

#### **OPPOSITION TO THE KILLING OF WILDLIFE ON THE DESOTO NATIONAL WILDLIFE REFUGE**

##### **Public Opinion**

Theodore Roosevelt established the first National Wildlife Refuges in 1903 as "inviolable sanctuaries" for wildlife. The original intent and purpose of the wildlife refuges were clear. It was not until the early 1950s that the FWS began to allow the commercial and recreational killing of wildlife at some refuges. Most Americans still view wildlife refuges as places where wild animals are protected from human interference. That is in fact the common definition of the word "refuge."

The majority of people who visit refuges do so to observe wildlife and enjoy nature. According to a FWS survey of 30 million people who visited refuges, 21 million visited for wildlife observation and "just to experience nature," while only 1.4 million visited to hunt or trap. Clearly, non-consumptive users of the National Wildlife Refuge System (NWRS) far outnumber consumptive users. Hunters and trappers, who comprise less than 6% of the population, already have access to millions of acres of public and private lands outside the refuge system for their activities. The NWRS compromises just 5% of all lands available to hunters. Hikers, birdwatchers, campers, and photographers are entitled to enjoy at least 5% of public land free from the dangers of stray bullets or from witnessing the maiming of wildlife.

The majority of Americans oppose the recreational and commercial killing of wildlife on National Wildlife Refuges. The results of a 1999 national Decision Research public opinion poll support this assertion.

- 79% of those polled opposed allowing trapping on America's National Wildlife Refuges.
- 78% of those polled opposed allowing refuge officials to kill wildlife by trapping, hunting, or poisoning.
- 71% agree that as long as refuge officials can remove dangerous animals, there is no reason to allow any other killing of animals on refuge property.
- 88% of those polled support either a ban on all commercial and recreational trapping for fur or a ban on cruel types of traps, such as leghold or body-gripping traps.



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*predators. These include techniques such as electric fencing ... metal barriers ... and wire mesh enclosures ... [Rimmer and Deblinger 1990: 223]*

We request that if the FWS is currently engaged in, or is proposing, predator control in the management of piping plovers, or any other T&E species on the refuge, that a thorough discussion of this issue be included in the CCP, incorporating a review of recent scientific research regarding non-lethal predator management methods for protection of threatened and endangered species, specifically with regards to predator exclusion techniques including fencing and enclosures.

#### CONCLUSION

The Animal Protection Institute opposes the killing of wildlife on the DeSoto National Wildlife Refuge, especially for recreation.

Further, because the DCCP lacks vital biological data required to assess the impacts of proposed management, we request that the U.S. Fish and Wildlife Service produce another Draft Comprehensive Conservation Plan that includes population data for all species, especially those that could be impacted by human recreation (including hunting, fishing and trapping) or ecosystem management.

Thank you for your consideration of these comments and we look forward to your response on this matter of importance to our organization.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Papouchis', written over a light-colored background.

Christopher M. Papouchis, M.S.  
Wildlife Specialist  
Animal Protection Institute

A handwritten signature in black ink, appearing to read 'Camilla H. Fox', written in a cursive style.

Camilla H. Fox  
Wildlife Program Coordinator  
Animal Protection Institute

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*Literature Cited*

- Rimmer, D. W., and R. D. Deblinger. 1990. Use of predator enclosures to protect piping plover nests. *Journal of Field Ornithology* 61: 217-223.  
U.S. Fish and Wildlife Service. 1988. Atlantic Coast Piping Plover Recovery Plan. U.S. Fish and Wildlife Service. Newton Corners, Mass. 77 pp.