



Wildlife Management Institute

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September 25, 2000

Mr. Jim Salyer
U.S. Fish and Wildlife Service
Southern Missouri Ascertainment Office
24385 State Highway 51
Puxico, MO 63960

Dear Mr. Salyer:

This letter, on behalf of the Wildlife Management Institute, is to provide comment on the draft Comprehensive Conservation Plan and Environmental Assessment (CCP) for the DeSoto National Wildlife Refuge, distributed with a cover letter dated August 17, 2000.

The Wildlife Management Institute (WMI) is a non-profit scientific and educational organization staffed by experienced professional wildlife managers. Established in 1911, WMI is dedicated to the sound management of wildlife and associated resources.

The Fish and Wildlife Service (FWS) is to be commended for the important effort undertaken in establishing and renewing CCPs for the national wildlife refuges. This draft of the CCP for DeSoto NWR is generally well designed and complete. I offer the following comments, which I believe may be incorporated to further strengthen the plan. Some of these comments are merely to support important components of the draft CCP for inclusion in the final version. This review is based primarily on the goals, objectives and strategies set forth in the draft plan.

It is critical that the state wildlife agencies, the Nebraska Game, Fish and Parks Department and the Iowa Department of Natural Resources, be full partners throughout the planning process; the input of these agencies should carry a preponderance of influence on the CCP's final nature. It is also important to ensure that all public comment received during the planning process receives feedback through the planning process. The open house forum and other public input opportunity announcements are laudable means for engendering input and support for the final plan.

It is appropriate that the first goal (1.1 [assumed highest priority]) of the plan is to manage refuge habitat for waterfowl benefits. This should be retained as the refuge's primary purpose.

I generally support the conversion of croplands to native grasslands, however, strategies 1.1.1.1, 1.1.1.2, 1.1.2.2, 1.2.1.1, and 1.3.1.5, as well as others that call for cropland conversion to grassland and monitoring of habitat uses, may be mutually limiting. Waterfowl use may decrease with loss of croplands, which may



not be desirable. Other species' use of the refuge also may decline with replacement of croplands; these changes may dictate alterations in the objectives for cropland reduction or for species diversity, as indicated by monitoring programs and the priority of species' needs. In short, if cropland conversions prove to be deleterious to key species, such as waterfowl, it may be necessary to alter grassland establishment objectives (reflected throughout the plan); this flexibility should be reflected in the plan.

The guided snow goose hunt (Obj. 1.2.1.1) and the accompanying rationale do not seem well founded. If the guiding requirement is to remain in place, it should be supported by documentation that there is a significant increase in public support (over unguided hunts) and that it results in a snow goose harvest greater than could be achieved through more numerous unguided hunts. Also, efforts to eliminate cropland and displace snow geese from the refuge should be coupled with monitoring programs to ensure that crop damage is not displaced disproportionately to nearby private croplands.

Objective 1.4.2 for grassland coverage increases is sound and supportable, with the caveats mentioned above. Emphasis should be on the use of native grass and forb mixes in grassland reestablishment.

The objective and strategies for wetland and wet meadow establishment under 1.4.3 are reasonable. Emphasis should be placed on projects that benefit declining, but under-appreciated species, such as American woodcock.

Again, the cropland reduction strategies under Objective 1.5.1 should be accompanied with a monitoring program to detect displaced depredation on private lands.

I support the action called for in Strategy 1.7.1.3, reconnecting DeSoto Lake to the Missouri River channel. This action could have significant benefits for water quality and terrestrial and aquatic species.

In addition to the actions prescribed in Strategy 1.7.2.1, I strongly recommend development and implementation of a drainage-wide, private lands, grass strip buffer program as a key component of a water quality improvement plan for the lake. Such a program may be best designed around a set of locally specific best management practices for agricultural lands, assembled in cooperation with affected landowners. Water quality monitoring should complement any changes in management of the drainage, in order to evaluate their impacts.

The dredging contemplated in Strategy 1.7.2.3 should be approached with caution, as the involved sediments may contain hazardous materials that could yield dredging impossible or deleterious to fish and wildlife.

I support the aggressive strategies to control invasive species, as outlined under Objective 1.8.1.

The narrative under Objective 1.9.1 implies that modern firearms are not to be allowed for deer hunting on the refuge; verbiage elsewhere in the draft plan document states that this is for safety purposes. Such a restriction should only be retained if it can be supported by objective data (I doubt that such data exists for these circumstances). Even if there is a legitimate concern over conflicting uses involving modern firearms deer hunters, such conflicts can be avoided by management actions the separate hunters from other users.

The strategies and rationale cited under Objective 3.1.1, for restricting non-wildlife-associated recreational uses of the refuge are fully supportable. Natural resource interpretation and education are important uses of wildlife refuges. The role of regulated modern hunting in our heritage and in wildlife management should be reflected as a key component of any educational or interpretive program.



The fisheries management objectives, 3.3.1 and 3.3.2, are well supported, and the accompanying strategies are generally sound. Water level manipulation needs for fisheries management should be incorporated control structure designs to benefit waterfowl and wading birds.

The objective and strategies set forth under 3.4.1 support hunting for waterfowl and deer only, with provisions for possible future youth-mentor hunting of pheasant and wild turkey. While youth-mentor hunts certainly are supportable, this position appears to be overly restrictive. Unless merited by sound data and core refuge needs, hunting and trapping regulations for the property should be no more restrictive than those of Iowa and Nebraska. The action set forth in Strategy 3.4.1.3 is commensurate with this. Strategy 3.4.1.4 calls for hunt management to minimize conflicts with other uses; this should be applied conversely as well, with prescriptions for managing other uses to avoid conflicts with hunting activity.

Section 4, on partnerships, is fundamentally sound. I would recommend, however, that staffing needs for volunteer and friends group management be considered before establishing or expanding these programs. Personnel demands for such efforts can be significant.

Increases in private land wetland and upland habitats (Obj. 4.3.1) may be partly achieved through "habitat banking", or allowing crop production, haying, or grazing on certain portions of the refuge in exchange for habitat development or protection on nearby private lands. These strategies are being employed on FWS properties elsewhere.

The goal of acquiring additional refuge lands is fully supportable. This should be done, however, in cooperation with adjacent landowners and their representative organizations. Neither the refuge operation nor the FWS in general should incur the negative relationships associated with land acquisition programs that are not executed in cooperation with private land interests.

Thank you for your work on this plan and on behalf of the affected wildlife resources and the DeSoto National Wildlife Refuge. Thanks too for considering these comments. Please let me know if you have questions or require clarification. I may be contacted at the phone number and address listed on this letterhead.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rob Manes".

Rob Manes
Midwest Regional Representative

c: Jim Douglas, NGFP
Allen Farris, IDNR
Rollie Sparrowe, WMI