

Appendix L: Response to Comments on the Draft Comprehensive Conservation Plan and Environmental Assessment

Response to Comments for EA and Draft CCP

Comment 1	<i>Public outreach and community education provided by the Refuge is lacking, and the preferred alternative does not adequately address current or future needs. It is not clear how the Refuge will recruit and train volunteers to accomplish environmental education objectives.</i>
Response 1	Under the preferred alternative, objectives 3.2 <i>Environmental Education</i> (pg. 58 dcep), 3.6 <i>Public Information</i> (pg. 61 dcep), 3.7 <i>Volunteers</i> (pg. 62 dcep), and 3.8 <i>Friends of Squaw Creek NWR</i> (pg. 63 dcep) represent an increase above current levels described in <i>Section 3.3.3 Public Use</i> (pg. 37 dcep). This modest but reasonable increase seeks to balance these programs with others under expected funding levels, and is consistent with the potential market as described in <i>Section 3.2.6.1 Potential Refuge Visitors</i> (pg. 30 dcep). The existing staff includes a Park Ranger position that is largely devoted to delivering visitor services. The Park Ranger as well as other Refuge staff will assist in implementing these objectives and strategies including training volunteers.
Comment 2	<i>Control, but do not destroy American lotus on the Refuge.</i>
Response 2	Strategy 2 under <i>Objective 1.1 Wetlands</i> (pg. 41 Draft CCP) is directed at controlling American lotus and other pest plant species. American lotus will continue to exist on the Refuge.
Comment 3	<i>American lotus could be the focus of a summer festival or workshop that helps with public outreach and environmental education.</i>
Response 3	The environmental education and public outreach services described in <i>Objective 3.2 Environmental Education</i> (pg. 58 Draft CCP) and <i>Objective 3.6 Public Information</i> (pgs. 61 Draft CCP) do not preclude a festival or workshop focused on American lotus. Nevertheless, American lotus is not the focus of these programs because it provides little value for wildlife, especially for migratory birds that use the wetlands where the plant is found. American lotus also reaches nuisance levels if not carefully managed.
Comment 4	<i>Allowing hunting of Snow Geese is contradictory to the purpose of the refuge</i>
Response 4	Hunting is consistent with the purpose of the Refuge described in <i>Section 1.2 Refuge Purpose</i> (pg. 4 Draft CCP). The purpose is derived from Executive Order 7156 which references the Migratory Bird Conservation Act, neither of which precludes hunting. In 1949 Congress amended the Migratory Bird Conservation Act to allow waterfowl hunting on 25 percent of areas acquired under its authority. Congress increased the figure to the present level of 40 percent in 1958. In 1978 Congress added a provision granting the Secretary of Interior discretion to exceed the 40 percent standard by an unlimited extent when it is beneficial to the species. The area on which Snow Goose hunting would take place is 3 percent of the Refuge. Strategy 1 of <i>Objective 2.4 Reduction of Snow Geese</i> (pg. 54 Draft CCP) has been modified to better describe the extent and duration of the Snow Goose hunt.

Comment 5	<i>Allowing hunting of Snow Geese will have negative effects on the geese and other creatures.</i>
Response 5	As noted in <i>Section 4.1.6 Snow Goose Management</i> (pg. 114 Draft CCP) the intent of the Snow Goose hunt is to contribute to the reduction of the mid-continent population of Snow Geese. It would have an adverse effect on individual geese, but would benefit the population overall. At present numbers Snow Geese exceed the carrying capacity of their nesting grounds in Canada and are adversely affecting the habitat. The hunt is not anticipated to have negative effects on other wildlife species.
Comment 6	<i>A number of comments oppose allowing Snow Goose hunting on the Refuge.</i>
Response 6	The 1997 National Wildlife Refuge Improvement Act identifies hunting as one of six priority public uses to be facilitated on Refuges. Hunting Snow Geese and/or other game species is allowed on many National Wildlife Refuges, in some cases for decades, without adverse effect on wildlife populations. Hunting is a compatible use and consistent with the purposes of Squaw Creek NWR. <i>Section 2.1.3 Snow Goose Management</i> (pg. 10 Draft CCP) discusses Snow Goose over abundance and the need to reduce the population. See also Responses 4 and 5 above for more on Snow Goose hunting and its anticipated impacts.
Comment 7	<i>The plan is comprehensive and well written</i>
Response 7	Comment noted
Comment 8	<i>A number of comments support the selection of the preferred alternative.</i>
Response 8	Comments noted
Comment 9	<i>I support managed hunts for white-tailed deer and Snow Geese, but oppose hunting of other waterfowl on the Refuge.</i>
Response 9	None of the alternatives contain a proposal to expand hunting beyond the two species mentioned.
Comment 10	<i>The term “refuge” implies a safe place for wildlife where hunting does not occur.</i>
Response 10	While National Wildlife Refuges are managed first and foremost for wildlife, hunting is allowed when it will not negatively impact the population being hunted. Some wildlife populations, such as those of deer and Snow Geese at Squaw Creek NWR, reach levels that do harm to the habitat. In the case of deer the problem is local, while for Snow Geese the problem is greatest on the northern breeding grounds. It is consistent with wildlife management principles to lower the numbers of these species before they cause harm to the habitat and in turn negatively affect other forms of wildlife. Also see Response 6 above.
Comment 11	<i>Hunting will conflict with other public uses of the Refuge.</i>
Response 11	Hunting is not anticipated to conflict with other public uses. Deer hunting occurs 3 days per year on 41 percent of the Refuge usually during December or January. The area is closed to the public during this time to minimize conflicts. Conflicts with other public uses will be minimized since the Snow Goose hunt would occur on only 3 percent of the Refuge (about 200 acres) and will not be permitted within one-quarter mile of the auto tour route. Hunting is one of the priority wildlife-dependent public uses on refuges as well as being a useful population management tool in this instance.

Comment 12	<i>Allowing hunting on the Refuge will cause Snow Geese to avoid the Refuge along with Bald Eagles that follow the flocks. Fewer geese would make the annual migration less of a spectacle and cause fewer people to visit the Refuge.</i>
Response 12	We do not anticipate any adverse effects of the Snow Goose hunt on Bald Eagles or wildlife viewing during the annual migration. The Refuge provides important migratory habitat in an area where migrating waterfowl have few alternative stopover sites. Allowing hunting on 3 percent of the Refuge is not anticipated to disrupt Snow Goose use. Snow Geese primarily use the Refuge for roosting, and the areas where this occurs are within the 97 percent of the Refuge that will not be open to Snow Goose hunting. We expect large numbers of Snow Geese to continue to use the Refuge. The reaction of light geese (Snow Geese and Ross's Geese) to this hunt will be closely monitored by Refuge staff and appropriate measures will be implemented if necessary to minimize any unintended impacts.
Comment 13	<i>Convert croplands (specifically corn) to native grasslands to attract fewer Snow Geese.</i>
Response 13	As noted in <i>Section 4.5.2 Wildlife and Habitat Resource Management</i> (pg. 121 Draft CCP) under the Preferred Alternative, 279 acres of cropland would be converted to grassland or prairie, but this is not likely to affect the number of Snow Geese using the Refuge. Snow Geese predominantly use the Refuge for roosting and feed in cropland outside the Refuge.
Comment 14	<i>Construct a boardwalk from bone yard to bluff pool.</i>
Response 14	This was not considered as a part of this analysis because the proposed boardwalk would be long (more than 1 ½ miles in length), costly to build, and travel a narrow strip between Davis Creek and private property. It would also present a potential safety hazard during hunting seasons since hunting occurs on private property adjacent to the refuge boundary along this location.
Comment 15	<i>Buy as much land as possible to add to the Refuge.</i>
Response 15	All of the alternatives include a provision to acquire up to 400 acres from willing sellers within the existing authorized boundary (<i>Objective 1.9 Land Acquisition</i> , pg. 49; Table 1, pg 90). We considered Refuge expansion, but chose not to pursue it at this time. See <i>Appendix A, Section 2.2 Alternatives Considered But Not Analyzed in Detail</i> (pg. 88 Draft CCP) for more information.

Comment 16	<i>There is no need to add a law enforcement officer, fire specialist, and part-time clerk. The present staff does a wonderful job with burns and law enforcement.</i>
Response 16	<p>Presently, no one on the Refuge has law enforcement credentials, but there is a need for law enforcement. In the past law enforcement activities were included as part of a wider range of duties for some of the Refuge staff. The role of law enforcement officers has grown more complex, and maintaining law enforcement credentials has become more demanding in terms of time and training. In response to these changes the agency is shifting towards full time law enforcement officers. The law enforcement strategies included under <i>Objective 3.12 Health and Safety</i> (pg. 65 Draft CCP) of the preferred alternative reflect this trend.</p> <p>Likewise, the knowledge, skills, and abilities required to carry out a safe and legally compliant prescribed fire program have become more demanding, and require a position largely dedicated to these tasks. The prescribed fire specialist position referenced under <i>Objective 1.2 Wet Prairie</i> (pg. 45 Draft CCP), <i>Objective 1.3 Bottomland Mesic Prairie</i> (pg. 46 Draft CCP), and <i>Objective 1.4 Loess Hills Prairie</i> (pg. 47 Draft CCP) is necessary to carry out management of these habitats.</p> <p>Finally, more than 130,000 people visit the Refuge annually, most during the spring and fall migrations. During these peak times we are unable to meet the demand with present staffing. The seasonal clerk position noted under <i>Objective 3.2 Environmental Education</i> (pg. 59 Draft CCP) would help meet this demand and also help implement the other strategies described under this objective.</p>
Comment 17	<i>Maintaining a small bison herd on the Refuge would provide a unique wildlife viewing opportunity that would draw visitors.</i>
Response 17	Although within the historic range of the bison, most of the grasslands within the Refuge are in the loess bluffs adjacent to wetlands and are not suitable for bison. Presently, five National Wildlife Refuges in the United States are authorized to preserve and propagate remnant herds of nationally and/or historically significant animals such as bison. Squaw Creek NWR is not one of the five.
Comment 18	<i>Convert the ditches to a more natural state.</i>
Response 18	This was considered under Alternative B Restore Historic Wet and Mesic Prairie. See <i>Appendix A Section 2.3.2</i> (pg. 89 Draft CCP), <i>Section 4.3</i> (pg. 118 Draft CCP), and <i>Section 4.7.2</i> (pg. 123 Draft CCP).
Comment 19	<i>It would be good to see more management of invasive plants including use of herbicides.</i>
Response 19	Prescribed burning, mechanical, and chemical (which includes the use of herbicides) measures to slow the spread of invasive plants are included under all alternatives. Numerous strategies throughout <i>Section 4.2</i> (pg. 41-52 Draft CCP) address control of invasive species.

Comment 20	<i>Allow some harvest of American lotus by the public as part of the control measures.</i>
Response 20	American lotus blooms in July and produces seed pods thereafter. The pods are generally ready to harvest in the fall. However, this coincides with the fall waterfowl migration. Harvesting the pods during the fall would cause a disturbance factor to waterfowl and other marsh and water birds that are present since lotus is found in the deeper water areas that are used by waterfowl, particularly Snow Geese. The only efficient way to harvest any large number of pods that would be an effective control measure would require the use of a boat or canoe. Hence, a greater amount of disturbance.
Comment 21	<i>Perhaps the trees accumulating by the bridge on Squaw Creek can be removed from the water and placed in the woods to decay.</i>
Response 21	Removing and transporting trees and other woody debris that accumulates at the Squaw Creek water control structure would be time intensive and unnecessary. There is no shortage of woody debris in the surrounding uplands and eventually it will provide habitat for fish and other aquatic wildlife somewhere downstream. Trees, trash, and other debris from upstream sources is a concern that we will address in our work within the Davis and Squaw Creek watersheds. See <i>Objective 1.10 Watershed Improvement</i> (pg. 49 Draft CCP) for more information.
Comment 22	<i>Consumptive use of the Refuge should be kept to a minimum.</i>
Response 22	Presently, consumptive uses on the refuge include white-tailed deer hunting, cooperative farming, haying, fishing and mushroom picking. Snow Goose hunting is the only consumptive use being added. White-tailed deer hunting is an important management tool to reduce an over-population of deer that continue to cause damage to woodlands and cropland. Haying is on a very limited scale and is used as a supplement to our prescribed burning program and for grassland management and brush control. The refuge has little viable fish habitat and fishing is limited to ditches and creeks or snagging of non-game fish when excess water is released from Eagle Pool. Mushroom picking season is limited to 40 days in the spring and generates very little interest most years.
Comment 23	<i>Landowners depend on the income from hunters. Offering hunting on the Refuge would hurt the local community by drawing hunters away from private lands.</i>
Response 23	Conflicts with landowners renting out hunting rights will be minimized since the Snow Goose hunt would occur on only 3 percent of the Refuge (about 200 acres). The limited duration and extent of the Snow Goose hunt is not expected to draw hunters from nearby private lands. Hunting is one of the priority wildlife-dependent public uses on refuges as well as being a useful population management tool in this instance.
Comment 24	<i>If hunters abandon surrounding private lands in favor of the Refuge landowners may convert their lands to other uses, eliminating wildlife habitat.</i>
Response 24	See Response 23.

Comment 25	<i>Snow Goose hunting would have a negative effect on the spring migrating shorebirds</i>
Response 25	We do not anticipate a negative impact on migrating shorebirds from the spring Snow Goose hunt. The hunt would be limited to 3 percent of the Refuge and would be at least a quarter mile from any shorebird unit. Hunters would access the hunting area via Highway 118 to further minimize disturbance to shorebirds.
Comment 26	<i>I have no objection to the managed deer hunt. Hunt more deer.</i>
Response 26	As stated in <i>Objective 2.5</i> (pg. 54) the white-tailed deer population on the Refuge will be managed through controlled hunts to achieve a fall relative density of 20 to 25 deer per square mile.
Comment 27	<i>Hunting geese on the Refuge will cause them to leave the area. Local hunting clubs and the community would be hurt by the loss of revenue.</i>
Response 27	See Response 12 and Response 23 above. The reaction of light geese (Snow Geese and Ross's Geese) to this hunt will be closely monitored by Refuge staff and appropriate measures will be implemented if necessary to minimize any unintended impacts.
Comment 28	<i>It would be nice to have more wildflowers on the Refuge.</i>
Response 28	Part of the intent of <i>Objective 1.3, Strategy 11</i> (pg. 46 Draft CCP) and <i>Objective 1.4, Strategy 8</i> (pg. 47 Draft CCP) is to produce more wildflowers on the Refuge.
Comment 29	<i>Increase the amount of volunteer hours in Objective 3.7 from 7,500 to 10,000.</i>
Response 29	We agree. Objective 3.7 Volunteers has been changed to reflect this change.
Comment 30	<i>Prevent siltation of the Refuge by purchasing additional land to protect the watershed.</i>
Response 30	See Response 15.
Comment 31	<i>Develop cooperative agreements and conservation easements with watershed landowners to reduce the flow of sediment into creeks.</i>
Response 31	We intend to do this. See <i>Objective 1.10</i> (pg. 49 Draft CCP).
Comment 32	<i>The muzzleloader hunt is not adequate to manage the deer herd. Consider adding an archery hunt.</i>
Response 32	<i>Objective 2.5 White-tailed Deer Management</i> (pg. 54 Draft CCP) and <i>Objective 3.4 Hunting and Fishing</i> (pg. 60 Draft CCP) allow for the expansion of the muzzleloader hunt to help reduce deer numbers. In 1989 and 1990, the first two years of deer hunts at Squaw Creek, hunters were allowed to use muzzleloaders or bows. Hunter success rates were far greater for those using muzzleloaders. Expanding the muzzleloader hunt is a more effective means of reducing deer numbers.
Comment 33	<i>Any lands added to the existing Refuge should be left open to hunting if feasible.</i>
Response 33	The 400 acres that are presently approved for acquisition are primarily in cropland at this time. If acquired, they would be converted to either wetlands or grasslands. The sole hunting opportunities on these properties would probably be spring Snow Goose hunting.
Comment 34	<i>Refuge staff should work in coordination with the Arctic Goose Task Force to decide best measures for controlling the population.</i>
Response 34	The Snow Goose hunt is being offered in response to recommendations from the Arctic Goose Habitat Working Group as noted in <i>Section 3.1.2.4 Arctic Goose Management Initiative</i> (pg. 17 Draft CCP).

Comment 35	<i>Implement measures to reduce the population of Snow Geese, but attempt to do it in a way that does not drive geese away and detract from the annual migration spectacle.</i>
Response 35	The spring Snow Goose hunt will be limited to 3 percent of the Refuge, leaving most of the Refuge undisturbed. The reaction of light geese (Snow Geese and Ross's Geese) to this hunt will be closely monitored by Refuge staff and appropriate measures will be implemented if necessary to minimize any unintended impacts. See Response 23 and <i>Section 4.1.6 Snow Goose Management</i> (pg. 114 Draft CCP) for more on the environmental consequences regarding hunting of Snow Geese.
Comment 36	<i>Continue support of research of the Eastern massassauga rattlesnake.</i>
Response 36	We intend to do this. See Strategy 1 under <i>Objective 2.7 Eastern Massassauga Rattlesnake</i> (pg. 55 Draft CCP).
Comment 37	<i>Efforts to expand the Refuge should include potential habitat for the Eastern massassauga rattlesnake.</i>
Response 37	We considered Refuge expansion, but chose not to pursue it at this time. See <i>Appendix A, Section 2.2 Alternatives Considered But Not Analyzed in Detail</i> (pg. 88 Draft CCP) for more information. We do plan to convert 217 acres of cropland to bottomland mesic prairie, a habitat important to the Eastern Massassauga Rattlesnake. See <i>Objective 1.3 Bottomland Mesic Prairie</i> (pg. 45 Draft CCP) and <i>Objective 2.7 Eastern Massassauga Rattlesnake</i> (pg. 55 Draft CCP) for more information.
Comment 38	<i>In the areas of the Refuge used most heavily by the Eastern massassauga rattlesnake, habitat management should be directed towards meeting the needs of the snake. Any fires in these areas should be done when they will not harm the snakes.</i>
Response 38	As stated in <i>Objective 2.7 Eastern Massassauga Rattlesnake</i> (pg. 55 Draft CCP) management efforts will emphasize the Eastern massassauga rattlesnake in wet prairie and bottomland mesic prairie. Strategy 5 under <i>Objective 1.2 Wet Prairie</i> (pg. 44 Draft CCP) is intended to minimize adverse effects on the snake from prescribed burns.
Comment 39	<i>Efforts should be made to educate visitors to avoid snakes on Refuge roads. If necessary construct underpasses to allow snake movement and prevent mortality from vehicle traffic.</i>
Response 39	We have made attempts to educate the public about snakes, particularly the Eastern massassauga rattlesnake. We developed a leaflet that reminds visitors to avoid running over snakes on the road. It would not be feasible to construct underpasses on the auto tour route because snakes can be found crossing the roads throughout the entire 10 mile tour route.

Comment 40	<i>More land should be converted from heavily managed wetlands and crops/old fields to wet prairie and bottomland mesic prairie to meet the requirements of the Refuge Improvement Act's requirement to maintain biological integrity, diversity, and environmental health of the refuge. We agree with Objective 1.1 of alternative B's proposal to increase the acreage of wet prairie habitat well above 1,077 acres and we encourage the FWS to include this in the preferred alternative.</i>
Response 40	As noted in <i>Section 1.2 Refuge Purpose</i> (pg. 4 Draft CCP) the Refuge was established in 1935 as the "Squaw Creek Migratory Waterfowl Refuge" and its purpose is to provide habitat for migratory birds and other wildlife. The Refuge is used by numerous types of migratory birds and other wildlife, but it has a long history as a stopover for migratory waterfowl. Restoration of wet prairie would come at the expense of managed wetlands. Both are rare habitats in the Lower Missouri ecosystem. Converting the managed wetlands to wet prairie would reduce the amount of an important migratory habitat in an area where migrating waterfowl have few alternative stopover sites. Fish and Wildlife Service policy directs us to maintain biological integrity, diversity, and environmental health and where appropriate restore them in a manner consistent with refuge purposes and the Refuge System mission. Converting the managed wetlands does not best meet the purposes of the refuge.
Comment 41	<i>We recommend that all of the cropland/old fields should be converted to bottomland mesic prairie and Loess Bluff prairie as proposed in Objective 1.7 of alternative B. The preferred alternative does not convert enough cropland/old fields and its timeline is too slow. We believe that removing the refuge's artificial habitats which these two species (white-tailed deer and Snow Geese) have grown accustomed to, should be maximized before increasing and initiating hunting on the refuge. The conversion to bottomland mesic prairie and Loess Bluff will also help by providing more habitats for the candidate Massasauga rattlesnake and for area songbirds which have seen a dramatic decline in numbers.</i>
Response 41	As noted in <i>Section 2.3.4 Alternative D</i> (pg. 94 Draft CCP) the preferred alternative seeks to maximize wildlife habitat and population management without adversely impacting current levels of wildlife-dependent recreation. To do this we chose to convert 279 acres of cropland to other habitats, and maintain 300 acres of cropland to serve as an attractant for wildlife and provide viewing opportunities. We modified the Environmental Assessment (<i>Appendix A</i> , pg. 119 Draft CCP) to note we will monitor the impacts of cropland reduction on wildlife viewing opportunities, and eliminated a number of references indicating a link between the amount of cropland and Snow Goose numbers and viewing. Snow Geese predominantly use the Refuge for roosting and feed in cropland outside the Refuge. The amount of cropland on the Refuge is not likely to affect Snow Goose numbers or use of the Refuge. Cropland does attract white-tailed deer and turkey, species popular with wildlife viewers.
Comment 42	<i>We feel that there should be guidelines in the compatibility determination on white-tailed deer hunting which outline how the refuge will inform hunters of the presence of the Massasauga rattlesnake and Western fox snake and ensure that these snakes are not harassed or killed.</i>
Response 42	Both of these species are hibernating during the winter months when the deer hunt occurs. This precludes any potential harassment from deer hunters.

Comment 43	<i>We fail to see how mushroom gathering is compatible with refuge purposes or the Refuge System mission. It has the potential to degrade the ecological integrity of areas where it is allowed especially if it becomes a commercial activity. We feel it should not be authorized on the Refuge.</i>
Response 43	<p>Mushroom picking is a non-wildlife dependent public use. Such uses can occur on National Wildlife Refuges where they are compatible with the Refuge System mission and the refuge purposes, and do not conflict with wildlife-dependent recreation. Mushroom picking meets these standards.</p> <p>The quantity of mushrooms produced in a given year is closely tied to variations in temperature and moisture. In general, wet years produce more mushrooms and dry years fewer. The temperature and moisture regime of northwest Missouri does not reliably produce conditions favorable to mushroom growth. Mushroom crops plentiful enough to interest pickers occur about once every 3-4 years. These sporadic crops are unlikely to attract those seeking large quantities of mushrooms for commercial use.</p> <p>Much of the concern regarding mushroom picking originated in the Pacific Northwest where climate and vegetative cover favor mushrooms including a number of rare species associated with old growth forests. There collection of large quantities of mushrooms for commercial use is common and has resulted in greater research and regulation to promote sustainable harvesting practices and protection of rare species. The Forest Service’s Pacific Northwest Research Station maintains a website regarding research and monitoring of commercially harvested forest mushrooms. They note that initial small scale studies on the impacts of edible mushroom picking show that careful harvesting does not diminish subsequent fruiting (http://mgd.nacse.org/fsl/MonitorPoster/).</p> <p>Commercial use is not anticipated nor is it permitted under the compatibility determination. Mushroom gathering is limited to 10 pounds per year for each individual and is not anticipated to adversely impact the ecological integrity of the Refuge. Archeological evidence from within the Refuge shows it has been inhabited by humans for more than 12,000 years. Many of the early inhabitants relied heavily on wild plants for food. It is reasonable to conclude that they harvested mushrooms when available and that permitting individual gathering today is consistent with the historic conditions of the area.</p> <p>The Missouri Mycological Society is engaged in a study to determine the effects of harvesting on the fungi <i>Cantherellus</i>, a species commonly collected within the state. The results of this and any similar studies will be useful in guiding future policy on this matter.</p>

