

Appendix K: Response to Comments on the Draft CCP

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The following is a summary of the comments received on the Draft CCP and how the issues are addressed in the final plan.

1. One organization opposes the expansion of hunting on the Refuge.

Hunting is one of the six wildlife-dependent public uses of national wildlife refuges specifically encouraged by the National Wildlife Refuge System Improvement Act of 1997. Whenever a particular type of hunting is compatible with the Refuge's purposes, goals and objectives, and can be conducted in a sustainable manner, it may be permitted. Wildlife populations are monitored, and where a population is below target levels, hunting is suspended or reduced until the population recovers.

2. One organization contends that trapping of furbearers poses a hazard to threatened and endangered species and that certain trapping methods are inhumane and thus inappropriate for facilities protection.

Limited trapping is conducted at Sherburne NWR to control predators of ground-nesting birds; i.e., mink and raccoon. In addition, trapping is used to control the number of furbearers that damage Refuge infrastructure, namely muskrat and beaver. The trapping by several permittees is on a sustainable, relatively small scale. In addition, trapping is restricted to "conibear" type killing traps and water sets using leg-hold traps that incorporate drowning locks and with sufficient water depth to ensure rapid submergence and drowning of an animal. There are several additional special conditions within the trapping program that avoid potential negative impacts on non-target animals, including threatened and endangered species. A draft compatibility determination on trapping of furbearers, containing more detail, was published as part of Appendix D in the Draft CCP.

3. One organization asserts that the Draft CCP for Sherburne does not meet the requirements of the National Wildlife Refuge System Improvement Act of 1997 because insufficient investigation of biological integrity, diversity and environmental health were undertaken prior to plan preparation. They state that rigorous biological analyses need to be conducted of wildlife populations to ensure that there is a surplus, before making any compatibility determinations about the killing of wildlife.

The Draft CCP listed a number of wildlife surveys and censuses that are conducted at Sherburne NWR including those for deer, waterfowl, marsh birds, and furbearers. These studies, in sum, provide an adequate basis for making informed decisions on the compatibility of hunting and trapping. In addition, the year-to-year trapping records themselves, and long-term trends in these numbers, furnish valuable information that can be used in opening or closing seasons. Recognizing that it does not have limitless budgetary and personnel resources to conduct ideal surveys that would yield perfect information on wildlife population sizes, the Refuge and Service use adaptive resource management, several features of which are monitoring, feedback, flexibility, and making adjustments in midcourse whenever the data indicate the need for change.

4. One commenter expressed concerns about the amount of time and money that may be dedicated to off-site programs. Specifically, the commenter believes that vital Refuge resources may be used during times of reduced budgets and staffing.

The preferred management alternative, Alternative 4, calls for a modest expansion of the existing private lands program and new contacts with local governments, land developers and non-government organizations to encourage habitat conservation on lands surrounding the Refuge. The Refuge does not intend to divert staff and financial resources from on-site programs. However, habitat corridors and buffer areas around Sherburne NWR will complement the needs of many wildlife species and the conservation efforts occurring on-Refuge.

5. One individual suggested some sort of record or memorial for the landowners who sold their land to establish the Refuge. Specifically, a public display of photographs of original farms was offered as an idea.

The cultural history of the land and its inhabitants is an important part of Sherburne NWR's identity. The CCP outlines several new cultural resource strategies including development of an oral cultural history to preserve the "community memory" about the area prior to Refuge establishment. We also plan to incorporate cultural history messages into programs, exhibits and other media. Historical photographs and narratives will certainly be a vital part of this endeavor.

6. One individual does not want to see an increase in hunting on the Refuge.

Comment acknowledged. Please see previous response on the appropriateness of hunting on the Refuge. A spring Wild Turkey hunt for hunters with disabilities is the only new hunting opportunity proposed in the CCP.

7. The Sherburne County Board of Commissioners suggested that the CCP should "identify, support, and place emphasis on the need for regional trail systems and to plan and collaborate with local units of government on the development of regional trails that link to, travel along side of, or perhaps travel through the Sherburne National Wildlife Refuge."

Wildlife observation and photography are priority recreational uses of national wildlife refuges and properly placed trails can provide access for these activities.

The Refuge currently offers a 7.3-mile wildlife drive (auto tour and bicycle route) and 9 miles of hiking trails. The draft CCP identifies the need for some new interior trails in connection with the proposed visitor center.

The Service would certainly be interested in discussing proposed trails that would connect to the Refuge. However, some uses allowed on public trail systems, such as snowmobiling and horseback riding, are not compatible with the primary purpose of Sherburne NWR as a national wildlife refuge. The potential for filling wetlands and fragmenting wildlife habitat are additional concerns. Limited funding for construction and maintenance also play a part in trail decisions.

Based on this comment, we have added a trails coordination strategy to Objective 5.3 in Chapter 4.

8. One national organization and several individuals commended the Refuge for the strong ecological emphasis placed on future habitat management.

Comment acknowledged. The Service appreciates these statements of support for its comprehensive efforts to restore native biodiversity and vegetative communities on the Refuge.

9. The Sherburne County Planning & Zoning Administration asked that staff address the prevalence of oak wilt disease on the Refuge and the potential for control measures.

Oak wilt disease has been detected on the Sherburne NWR, throughout Sherburne County and central Minnesota. Many silviculturists believe that the disease is an endemic (native) pathogen that has long been a part of oak forests in the Midwest. The disease has likely served as a control measure for oak stands that become too dense or monotypic. The Refuge has not actively used any control measures for oak wilt infestations occurring in the interior of the Refuge. We believe that the disease is a natural part of the ecosystem and the historic disturbance regime of oak savanna.

However, the Refuge has actively participated in the control of oak wilt when it has been shown to be a threat to neighboring landowners and will continue to do so. Nonetheless, without a comprehensive county-wide strategy for managing oak wilt, control measures performed on the Refuge will be ineffective in stopping the spread of this disease on private and other public lands.

10. One individual expressed concern over habitat manipulations such as the flooding and cutting of trees and prescribed fire. Specifically, the comments expressed a desire for a “natural” landscape by letting all trees grow and for fires to occur naturally.

Comments acknowledged. The overarching mission for Sherburne NWR and other lands within the National Wildlife Refuge System is the conservation of wildlife. This requires active manipulation of the land to benefit wildlife. It is the goal at Sherburne NWR to restore the historic natural habitats and their associated wildlife. To achieve this, wetland and fire management actions are applied. Habitats in transition to their final state, such as large burned areas and newly flooded wetlands, are unsightly to some visitors and may appear unnatural. However, these actions, designed to mimic natural processes, will reap long term benefits to wildlife and their habitats.

11. The Minnesota State Historic Preservation Office (SHPO) commended the Service on the strategy to complete a Cultural Resources Management Plan, or survey plan, as a step-down plan to the CCP and suggests stating a target date for initiating the survey.

The Service appreciates this endorsement from a partnering State agency. We intend to initiate a management plan within 3 years of CCP approval. The target date of 2008 has been added to Table 13 in Chapter 5; a listing of step-down management plans. Toward this end, a baseline inventory of cultural resources on the Refuge was completed in 1994 and a summary of archaeological excavations was completed in 1997. Additionally, cultural resource surveys are completed whenever work is proposed on the Refuge that has the potential to impact archaeological sites.

12. The Minnesota SHPO encouraged the Service to evaluate the old schoolhouse near the Refuge headquarters to see whether it meets National Register of Historic Places criteria and, if it does, include its cultural value in any discussion of future reprogramming of maintenance and/or usage of the building.

Comment acknowledged. An evaluation of the eligibility of the schoolhouse for the National Register of Historic Places was conducted in 1994 by BRW, Inc. in conjunction with a Phase I and Phase II Archaeological Survey for the realignment of CSAH 9. This report deemed that the schoolhouse was not eligible for the following reasons: “1) the structure has been somewhat modified by additions and renovations, 2) no events or persons of national importance appear to be connected to the building, and 3) there are nearby examples of rural turn of the century school houses which would better illustrate and illuminate that slice of the American past.

