

# Chapter 7: Public Comment on Draft EIS and Response

The following is a summary of the comments received on the Draft EIS/CCP and how the issues are addressed in the final document. Written comments were received from 18 individuals, two special interest groups and two governmental agencies. These comments contained 48 issues, concerns, or questions that the U.S. Fish and Wildlife Service responds to in this chapter.

Comments received on the Draft EIS/CCP are presented at the end of this chapter, beginning on page 175.

## 7.1 Comments on the Planning Process

- 1) ***The U.S. Environmental Protection Agency indicated that they had a lack of objection to the plan and did not identify the need for additional information or consideration of environmental issues.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 2) ***Three people expressed general support for the plan and the Refuge.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 3) ***One person commented on the failure to advertise nationally or contact animal protection groups.***

*Response:* Chapter 6 on page 164 summarizes the outreach and consultation that occurred during the preparation of the plan. More than 200 groups and individuals were contacted directly; many more attended public meetings and workshops. More than 2,600 people were mailed updates and all proceedings and copies of drafts were available on the Service's planning web site. Notices of availability were published nationally in the federal register and notices for public meetings were published in local print, radio, news and electronic media. The Service made every effort to contact a wide range of interested parties.

- 4) ***The U.S. Environmental Protection Agency requested that additional National Environmental Policy Act (NEPA) analysis and documentation be completed when implementing specific projects.***

*Response:* As required, any projects likely to have a significant impact on the environment will comply with NEPA and have the appropriate documentation. Appendix H on page 275 lists the step-down plans that will be completed to identify details specific to each action. These step-down plans will include NEPA evaluation and public involvement as appropriate.

## 7.2 Comments on Goal 1: Landscape

- 5) *The Nature Conservancy commented that they would like to see more protection and restoration of blufflands adjacent to the Refuge.*

*Response:* Authority for land acquisition, either in fee or easement, stems from the Record of Decision signed by the Regional Director for the 1983 Refuge Master Plan. That plan did not identify bluffland areas for addition to Trempealeau NWR. The CCP does not alter the approved Refuge boundary established by that earlier authority. Many agencies need legislative authority for acquisition, but in the Service, that authority still rests with the agency, although major expansion now require Director's approval and new NEPA compliance documentation.

- 6) *The U.S. Environmental Protection Agency requested additional information on how the Refuge would integrate with the Navigation Ecosystem Sustainability Program (NESP).*

*Response:* NESP was recently authorized by Congress, but appropriations for implementation of projects have yet to be authorized and are uncertain. The Refuge will consider how it might integrate NESP with the goals and objective of the CCP depending on how funding and projects are authorized and administered.

## 7.3 Comments on Goal 2: Wildlife and Habitat

- 7) *Three people commented that they would like to see increased efforts to manage for shorebirds, including appropriately timed pool drawdowns.*

*Response:* Wetland management, including drawdowns will consider the needs of shorebirds (see Objective 2.2 on page 69). Timing of drawdowns is important for these migrants, however, high spring flows often preclude lowering pool levels during the appropriate time. Mudflats will be available in the fall during years when the pools are lowered. This

will not occur every year, because other issues such as invasive plant and fish management, and costs of pumping must be considered.

- 8) *Eleven people expressed support for the variety and quality of habitats, restoration of prairies, and control of invasive and exotic plants.*

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 9) *One person opposed prescribed burning due to impacts on frogs and release of mercury into the air.*

*Response:* Impacts to wildlife from prescribed burning are short-term and not expected to significantly effect populations. Burn units are situated on upland grassland areas and adequate escape cover is adjacent to all units. A smoke management plan is prepared before any burn and strict guidelines are followed to ensure that smoke does not cause a human health hazard.

Mercury emissions from prescribed fire of natural vegetation are expected to be minor and present no added environmental threat. No changes were made to the plan in response to this comment.

- 10) *One person commented that the over population of cormorants is depleting game fish, especially walleyes.*

*Response:* Trempealeau NWR does not have a breeding population of Double-crested Cormorants nor does it support a viable walleye population. This comment would be more applicable to adjacent Mississippi River waters. The plan does not have any objectives that call for increased populations of cormorants. No changes were made to the plan in response to this comment.

- 11) *One person requested more management emphasis be placed on management of Osprey.*

*Response:* The Refuge currently maintains four nesting platforms for Osprey. Osprey require large breeding ranges and rarely are all four platforms used in the same year. In 2007, three platforms had successful nests.

Forage fish are plentiful in Refuge pools. It would seem that abundant habitat is available for these birds. Other factors beyond the control of the Refuge staff, like competition from increasing Bald Eagle populations may be contributing to low Osprey numbers. No changes were made to the plan in response to this comment.

**12) Three people commented that the plan needed more focus on grassland birds and neotropical migrants.**

*Response:* Objectives 2.1, 2.3, and 2.4 all call for habitat improvements to grasslands and forests. In addition, the plan calls for the writing of a Habitat Management Plan (HMP) by 2010. The HMP will describe in detail the specific methods, timing, and location of management actions and how those actions are expected to benefit various types of songbirds. The Service recognizes the importance of the Refuge to songbirds and Objective 2.5 outlines plans for monitoring both birds and habitats. No changes were made to the plan in response to this comment.

**13) The Nature Conservancy supported increased emphasis on improvements to tributary streams.**

*Response:* Comments acknowledged. Objective 4.4 on page 83 calls for increased staffing and effort to restore tributaries in the upper watersheds of the Trempealeau and Buffalo Rivers.

**14) The Nature Conservancy supported the protection of threatened and endangered species and the reintroduction of extirpated species.**

*Response:* Comments acknowledged. Objective 2.6 on page 74 outlines the strategies for protection of threatened and endangered species.

**15) One person opposed the release of insects for biological control of invasive plants.**

*Response:* All insects released as part of biological control programs on the Refuge undergo rigorous testing for many years before the U.S. Department of Agriculture approves them for release. These insects are specific to the host plant and do not impact other plants. Biological control is strongly

preferred as an alternative to chemical control that can have secondary impacts to fish, wildlife, and other plants. No changes were made to the plan in response to this comment.

**16) One person opposed logging pine plantations.**

*Response:* The goal of habitat restoration on the Refuge is to more closely emulate the historic, pre-settlement conditions of the area. Prairie/oak savanna is a rare habitat throughout its former range due to conversion to agriculture, residential developments, invasive plants, and the need for periodic fire or grazing to maintain it. The roughly 800 acres of prairie/oak savanna on the Refuge is virtually all that remains of the historic “Trempealeau Prairie” that once covered thousands of acres across the lower half of the county. The objective is to restore the maximum amount of prairie/oak savanna. Non-native, pine plantations fragment the prairie units and provide few wildlife benefits. These pine plantations will be thinned or removed to provide larger, more contiguous areas of prairie. Specific details of the timing and location of pine removal will be detailed in a step-down habitat management plan as per Objective 2.1 on page 68. No changes were made to the plan in response to this comment.

## 7.4 Comments on Goal 3: Public Use

**17) Ten people commented that they would like to see more emphasis on birding and other non-consumptive uses.**

*Response:* Birding is generally included as a part of wildlife observation and is identified as a need in Section 1.4.8.3.1 on page 22 of the plan. Both wildlife observation and interpretation as well as photography are identified as priority uses of the Refuge System and are encouraged when compatible with the purpose of the Refuge. Objectives 3.1 and 3.3 on page 76 and page 77 respectively call for improvements to facilities and programming that will benefit birding and other non-consumptive uses. Additionally, waterfowl hunting (Objective 3.5 on page 80) will be restricted to less than one-third of the Refuge area and will be permitted to special groups

of new hunters or hunters with disabilities. Hunting pressure will be minimized by limiting the number and timing of hunts. The gun deer hunt lasts only 9 days. During most of the year the entire Refuge is open solely for use by non-consumptive users. We believe the plan calls for a fair distribution of consumptive and non-consumptive uses. No changes were made to the plan in response to this comment.

**18) *Two people commented on the need to increase public awareness of the needs of songbirds.***

*Response:* We agree. Objectives 3.3 and 3.4 both address increased public awareness of the needs of wildlife on the Refuge.

**19) *One person was opposed to any hunting or trapping on the Refuge.***

*Response:* We understand some citizens' concern with hunting on national wildlife refuges. However, hunting on refuges remains an important form of outdoor recreation for millions of citizens and a use that we are to facilitate when compatible with the purpose of the refuge and the mission of the Refuge System per the National Wildlife Refuge System Administrative Act (Refuge Administration Act). We have taken care to ensure the right balance between the needs of wildlife and people on the Refuge in keeping with the Refuge Administration Act and Service policy and regulation. We have also determined in a compatibility determination that hunting, with stipulations such as controlling the number of hunters, access, and timing of hunting, is a compatible use on the Refuge. We made no change to the rule as a result of this comment.

**20) *One person commented that birth control, rather than hunting, should be used to reduce deer populations.***

*Response:* Birth control has been used experimentally to control some wildlife populations. In the case of white-tailed deer, the logistics, cost, and effectiveness of using birth control methods on a wide ranging population is impractical and of doubtful success. No changes were made to the plan in response to this comment.

**21) *One person wanted more open water around the observation deck to improve waterfowl viewing opportunities.***

*Response:* The wetlands around the observation deck contain a diverse mixture of emergent plants that have increased over the years. The wetland emulates a 50:50 ratio of water to emergent cover that is ideal for waterfowl. It does however obstruct viewing as birds move in and out of the plants. The above water portions of the plants are present from about April to September, but die back during the fall when large numbers of waterfowl are present for viewing in the fall. Other species such as terns, herons, egrets and songbirds use the emergent vegetation in the spring and summer. All of the area around the deck is healthy and supports abundant wildlife throughout the year. The plan does not call for altering the habitat to improve viewing at the deck. No changes were made to the plan in response to this comment.

**22) *Five people commented that any recreational use should always be secondary to wildlife conservation.***

*Response:* We agree. In fact the National Wildlife Refuge System Improvement Act (see Section 1.4.4 on page 6) directs that each refuge shall be managed to fulfill the mission and purposes for which it was established, and that no uses may be permitted unless they are determined to be compatible with the fulfillment of mission or purposes. Compatibility determinations for all permitted uses are included in Appendix I of the plan. No changes were made to the plan in response to this comment.

**23) *One commenter asked that the Service not open or expand hunting opportunities on the Refuge citing concerns over compliance with the National Wildlife Refuge System Improvement Act, the National Environmental Policy Act (NEPA), and the Endangered Species Act, Section 7; and concerns that non-consumptive uses are not given enough emphasis.***

*Response:* This comment makes reference to a legal complaint filed in Federal Court, The Fund et al. v. Williams et al., Civ.No. 03-677. The complaint is under evaluation by the

court as of this writing and does not specifically discuss the hunting program on Trempealeau NWR. No changes were made to the plan in response to this comment.

**24) *Three people expressed interest in opportunities to view and experience native wildlife and plants in a quiet, scenic, natural and intimate way.***

*Response:* The vision for the Refuge (Section 1.4.7 on page 15) embraces the notion of the Refuge as a “scenic, beautiful place where a diversity of native plants and animals thrive...” The vision provides a simple statement of the desired, overall future condition of the Refuge and forms the basis of the goals and objectives. Implementation of the plan will provide ample opportunities for quiet, contemplative interaction with Refuge resources. No changes were made to the plan in response to this comment.

**25) *One person expressed support for continuing the hunting program for people with disabilities.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

**26) *One person expressed support for canoeing and kayaking on the Refuge.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

**27) *Two people suggested that access be improved for elderly people.***

*Response:* All new facilities or improvements to existing facilities will be accessible to people of all abilities as required by the Americans with Disabilities Act of 1992.

**28) *Two people commented that they liked the trail system, but one person opposed additional trails or signage.***

*Response:* The dike roads on the Refuge as well as the designated trails are open for hiking and other activities. At a minimum, people using the trails and dikes need interpretive information about regulations and safety. Additional interpretive signs are used to

enhance the visitor’s experience and to instill a better understanding of Refuge resources. Signs are carefully designed to be unobtrusive and to fit in with the environment. In addition, some facilities such as benches or observation decks are in place to ensure that people of all physical abilities may use them. No changes were made to the plan in response to this comment.

**29) *Three people expressed support for improvement to the bike trail; one person opposed improvements for biking.***

*Response:* The bike trail is managed jointly with the Wisconsin DNR and is used by thousands of bicyclists each year. The trail is an important asset to the Refuge and is an appropriate activity for enjoying the scenic beauty of the area in a non-consumptive way. No changes were made to the plan in response to this comment.

**30) *One person supported the construction of facilities for environmental education.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

## **7.5 Comments on Goal 4: Neighboring Landowners and Communities**

**31) *One person expressed support for the use of volunteers and in general for the volunteer program.***

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

## 7.6 Comments on Goal 5: Administration and Operations

- 32) *One person acknowledged the problem with the entrance road flooding, but would rather have funds spent on wildlife conservation than building a new bridge.*

*Response:* Staff and visitors need safe and reliable access to the facilities on the Refuge. Alternatives for providing year-round access to the Refuge for staff and the public have been evaluated numerous times over the years. The secondary entrance road at Marshland is actually a dike constructed in the early 1900s to divert the Trempealeau River. The dike was not designed as a major roadway and would need to be raised and widened, entailing significant wetland filling. In addition, the current access point to Highway 35/54 is on a corner, near a railroad intersection. The Wisconsin Department of Transportation has requested that the Refuge not encourage the use of this entrance by the public because of safety concerns at the highway/train intersection. The most prudent alternative is to replace the entrance road with a bridge that will provide access throughout the year. No changes were made to the plan in response to this comment.

## 7.7 Responses to comments by the State of Wisconsin Department of Natural Resources

- 33) *“We strongly support the primary land and water management goals in the Integrated Alternative such as: invasives survey and control; reduction of sedimentation; use of prescribed fire....; expansion of rare habitats such as sand prairie and oak barrens; and protected habitat for migratory birds.”*

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 34) *“We support increased resource inventory if data is collected by consistent and statistically valid means, and volunteers are given the same rigorous training and have the same ability as resource professionals to collect quality data”*

*Response:* We concur. Objective 4.3 on page 82 specifies that volunteers will be trained to effectively conduct biological surveys. No changes were made to the plan in response to this comment.

- 35) *“We support the expanded waterfowl hunting program geared to beginning and disabled hunters.”*

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 36) *“Due to the State’s interest in chronic wasting disease, we strongly support the continuation of deer hunting.”*

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 37) *“We are pleased that you plan to continue with the present trapping program as a sound resource management measure.”*

*Response:* Comments acknowledged. The Service appreciates this endorsement of its plan. No changes were made to the plan in response to this comment.

- 38) *The plan should include all “species of greatest conservation need” as identified in the State Comprehensive Wildlife Conservation Plan.*

*Response:* We concur. Objective 2.5 on page 73 has been amended to include “species of greatest conservation need” as identified in the State Comprehensive Conservation Plan.

- 39) *The Bald Eagle has now been officially de-listed as federally Threatened.*

*Response:* Changes were made to the document to update the current de-listed status of the Bald Eagle.

**40) The assessment for potential reintroduction of the Massasauga rattlesnake should include the entire Refuge rather than specifying any given location.**

*Response:* Concur: Objective 2.6 on page 74 was changed to assess the potential for reintroduction of Massassagua rattlesnakes to the Refuge.

**41) The potential for reintroduction of Karner blue butterflies should be assessed.**

*Response:* Concur. An additional strategy has been added to Objective 2.6 on page 74.

**42) A herptile management plan should be incorporated into future management. Turtles in particular many need special consideration.**

*Response:* We concur. An additional strategy has been added to Objective 2.5 on page 73 to include development of a Herptile Management Plan.

**43) Two State species of merit deserve special consideration in the plan: the State Endangered regal fritillary butterfly (*Speyeria idalia*) and the State Threatened brittle prickly pear cactus (*Opuntia fragilis*).**

*Response:* We concur. These species have been added to Table 5: Species with Special State Designation, on page 108. In addition, Objectives 2.5 on page 73 and 2.6 on page 74, define monitoring and consideration of species with special designations.

**44) Include reed canary grass and phragmites as key species needing control.**

*Response:* Concur. An additional strategy has been added to Objective 2.4 on page 71.

**45) Use mowing and herbicides as well as bio-controls on leafy spurge.**

*Response:* Leafy spurge is abundant on prairie areas in the Refuge, but rarely forms monocultures to the exclusion of native plants. The use of mowing and herbicides would impact all plants on the site including the desirable prairie species. At this time it is preferable to continue the biological control program that seems to be keeping leafy spurge somewhat in control at least to the

point that it is not excluding native prairie plants. No changes were made to the plan in response to this comment.

**46) Limit clearing of downed timber via fire-wood cutting to allow habitat for snakes, turtles and lizards.**

*Response:* Downed timber will be removed from areas that are within already established prairie burn units to facilitate efficient and safe burning operations. Low lying areas of forest used by most reptiles are generally not within the burn units. Adequate cover will be available for reptiles in areas adjacent to units where downed timber will be removed. No changes were made to the plan in response to this comment.

**47) We support the removal of pine plantations.**

*Response:* Concur. No changes made to the plan in response to this comment.

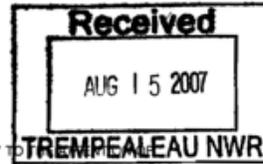
**48) Bell's Vireo habitat needs to be maintained and expanded.**

*Response:* The Refuge does support nesting pairs of Bell's Vireos. Understory restoration and removal of invasive shrubs will be phased so that habitat remains available to these birds until native plants reestablish. Specifics of grassland and forest restoration, and its relationship to Bell's Vireo and other species, will be described in the step-down plans listed in Appendix H, and will be available for comment before approval. No changes were made to the plan based on this comment.

## U.S. Environmental Protection Agency Comment, Page 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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AUG 01 2007

B-19J

Ms. Victoria Hirshboeck  
Refuge Manager  
United States Department of the Interior  
Fish and Wildlife Service  
Trempealeau National Wildlife and Fish Refuge  
W28488 Refuge Road  
Trempealeau, Wisconsin 54661

**RE: Comments for Draft Environmental Impact Statement for Trempealeau Wildlife & Fish Refuge EIS NO. 20070248**

Dear Ms. Hirschboeck:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U. S. Environmental Protection Agency (U.S. EPA), Region 5 has reviewed the Draft Environmental Impact Statement (EIS) and Comprehensive Conservation Plan (CCP) for the Trempealeau National Wildlife and Fish Refuge (Refuge). The Refuge was established by Executive Order 1936 to provide a refuge and breeding ground for migratory birds and other wildlife. The Refuge encompasses 6,226 acres of Mississippi River floodplain in western Wisconsin along the Mississippi River. The CCP will help ensure that this Refuge will contribute to fulfilling the overall mission of the Refuge system. The Draft EIS is to identify the new preferred alternative. Your agency has selected alternative C as the preferred alternative which calls for integrated public use, habitat, and wildlife focus.

Based on our review, we have rated the draft EIS as "LO". The "LO" indicates that we have a lack of objection and did not identify the need for additional information or environmental issues to be considered. However, we do offer the following comments for your consideration. These comments are on NEPA compliance and the relationship between the CCP and the Navigation Ecosystem Sustainability Program (NESP) which is led by the United States Army Corps of Engineers. We agree with the approach taken for this programmatic EIS to determine which broad thematic approach would be appropriate for the Refuge. Since the focus of a programmatic EIS is holistic, we can not agree that this document alone is suitable to provide specific project analysis to support future decisions under NEPA.

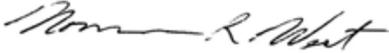
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## U.S. Environmental Protection Agency Comment, Page 2

Programmatic EISs are by nature not specific, therefore we believe that additional NEPA analysis and documentation that tiers from the Programmatic EIS is appropriate when implementing a specific project. We also recommend that the Final EIS provide narrative that explains how your agency will integrate the CCP for this Refuge with the NESP.

Thank you for the opportunity to review and comment on the draft EIS and Comprehensive Conservation Plan for the Trempealeau National Wildlife and Fish Refuge. If you have any questions or comments, please contact Al Fenedick of my staff. Al can be reached at 312 886-6872 or by E-mail at [Fenedick.al@epa.gov](mailto:Fenedick.al@epa.gov).

Sincerely,



*for* Kenneth A. Westlake, Supervisor  
NEPA Implementation  
Office of Enforcement and Compliance Assurance

### Wisconsin DNR Comment, Page 1



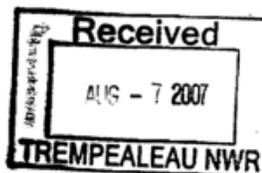
#### State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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August 1, 2007

Ms. Victoria Hirschboeck  
Refuge Manager  
USFWS – Trempealeau National Wildlife Refuge  
W28488 Refuge Road  
Trempealeau, WI 54661



RE: Draft Environmental Impact Statement and Comprehensive Conservation Plan – Trempealeau National Wildlife Refuge

Dear Ms. Hirschboeck:

The following comments represent the Wisconsin DNR comments on the Draft Environmental Impact Statement and Comprehensive Conservation Plan, Trempealeau National Wildlife Refuge. Our comments are organized in categories of General, Endangered Resources, and Invasive Species.

The Trempealeau National Wildlife Refuge is a large federal property located within the western border of Wisconsin. It provides tremendous opportunities for citizens to enjoy trapping, hiking, biking, and bird watching. It also provides unique opportunities for handicapped waterfowl hunting and special deer hunting seasons. From a natural resource perspective, the Trempealeau National Wildlife Refuge is one of the few and is the largest site on the Wisconsin side of the Mississippi River that features extensive uplands (mostly sand prairie, oak barrens, oak forest) in direct contact with the river corridor.

With this in mind we believe the overall plan represents a positive step forward for the future of the 6,226 acres over the next 15 years. We strongly support the primary land and water management goals in the "Integrated Alternative" such as: invasives survey and control; reduction of sedimentation; use of prescribed fire as a primary tool on appropriate upland habitat (prairie, barrens/savanna/ oak forest); expansion of rare habitats such as sand prairie and oak barrens; providing ample protected habitat for migratory birds. We support any opportunities to manage cooperatively with the Wisconsin Department of Natural Resources and other conservation land groups to help maintain the integrity of the area and in keeping with the NWR mission.

We support increased resource inventory, as the plan states, especially if data is collected by consistent and statistically valid means. The report also indicates that volunteers will be needed to complete these inventories. We assume a rigorous training program will be part of this program to help volunteers have the same ability as resource professionals to collect quality data.

Three recommendations of the plan are especially important to the Department in this Comprehensive Conservation Plan. First, we support the expanded waterfowl hunting program geared to beginning, youth and disabled hunters. Second, due to the state's interest in Chronic Wasting Disease we strongly support the continuation of deer hunting as an important measure to combat overpopulation and the spread of the disease. Finally, we are pleased that you plan to continue with the present trapping program as a sound resource management measure.



## Wisconsin DNR Comment, Page 2

### Endangered Species

The plan states that it will include occasions to work "with partners on endangered, threatened, special concern species". This should also include "species of greatest conservation need" as identified in our USF&WS funded and approved Wildlife Action Plan and also known as the Comprehensive Wildlife Conservation Plan.

The Bald Eagle has now been officially de-listed as a federally Threatened species. The document should reflect that changed status.

We support assessing the potential for massasauga reintroduction into the refuge with Wisconsin DNR. As a first step we suggest the location for this should state "into the refuge" rather than specifying any given location. The proposed River Bottom Rd area for reintroduction is likely not as viable for the snakes as the Wildlife Drive area due to its smaller size and lack of connectedness to the Trempealeau river. It will become more important to protect the Refuge from Mississippi river floods if this species is to be successfully reintroduced.

Similarly we would support the potential of reintroducing the Karner blue butterflies if sufficient lupine habitat is present. We can help provide a source of these insects when the habitat requirements are adequate in the Refuge.

A herptile management plan should be incorporated into future management. Turtles, in particular, may need special consideration when planning and implementing flowage management. Several turtles of high conservation concern occur on the Refuge (e.g., Blanding's and Wood turtles). We would extend the expertise of our Endangered Resources program to assist on such a plan and to work with you on the Wildlife Inventory Plan.

Two important state species merit consideration in this plan. The state endangered regal fritillary butterfly (*Speyeria idalia*) was documented on the Refuge in 1997 by Karl Leglar, Joan Berkopec and Ron Eichorn in S1/2 NW1/4 sec 12. Less than 10 populations of this species are known to still exist in WI with the TNWR population being one of them. Surveys should be conducted to verify that the population still exists. The larval host for this species is primarily Bird's foot and Prairie violets. Fire in burn units containing violets can reduce and potentially extirpate this species if consideration is not taken. The state threatened brittle prickly pear cactus (*Opuntia fragilis*) (may be referred to as *Opuntia humifusa* in the back of the document) was documented in 1991. On a visit to the refuge on July 5, 2007 it was documented again. Both of these species deserve special consideration in the next 15 years and beyond.

### Invasive Species

It would make sense to focus control efforts on those invasives that are most likely to spread into, increase in abundance, and seriously degrade key habitats (e.g., black locust and leafy spurge in prairie and barrens/habitats); reed canary grass in disturbed floodplain forest. A second focus might be to target those species that appear to be getting a foothold on the Refuge now, and which could be controlled relatively easily such as Phragmites.

Leafy spurge control should not rely on biocontrols alone, as control using this method has proved negligible at nearby Brady's Bluff at Perrot State Park. Instead, we recommend an integrated approach combining herbicide use, biocontrols, and carefully timed mowing. These methods have proved to be the most effective at Fort McCoy Military base.

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### Wisconsin DNR Comment, Page 3

We don't support increasing deer numbers (browsing pressure) as a means of controlling invasive shrubs (pg 22). Increased deer numbers are likely to reduce native plant species diversity, reducing the resilience of the system to thwart non-native species invasion.

Clearing downed timber via firewood cutting (pg 68) should be limited to allow some of this material to remain for thermo regulating opportunities and cover from predators for snakes, turtles, and lizards.

We support the removal of the pine plantations that fragment the open landscape context of the refuge prairies. The removal will benefit many rare and declining open landscape species such as grasshopper, lark, and vesper sparrows.

The Bell's Vireo, shrub habitat needs to be maintained and potentially expanded as well as situated so that potential conflicts with prairie restoration or invasive shrub control are minimized or eliminated. That said we continue to support black locust removal and control.

Thank you for the opportunity to comment on the Trempealeau National Wildlife Refuge – Draft Environmental Impact Statement and Comprehensive Conservation Plan. We look forward to working with you on this important refuge along the Mississippi River.

Sincerely,

  
Gretchen L. Benjamin  
Mississippi River Team Leader

CC: Scott Loomans, WDNR, Madison, WI  
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## The Nature Conservancy Comment, Page 1



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August 10, 2007

Vickie Hirschboeck, Refuge Manager  
U.S. Fish and Wildlife Service  
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W28488 Refuge Road  
Trempealeau, WI 54661

Subject: Comments on Draft Environmental Impact Statement and Comprehensive Conservation Plan for the Trempealeau National Wildlife Refuge

Dear Ms. Hirschboeck:

The Nature Conservancy (Conservancy) has reviewed the Draft Environmental Impact Statement and Comprehensive Conservation Plan (CCP) for the Trempealeau National Wildlife Refuge (Refuge). The Conservancy supports the preferred alternative, Alternative C, identified in the CCP. Implementation of this alternative would improve the protection and management of the important biodiversity found in this refuge.

**1. Conservancy's interest in the Refuge:** The Conservancy is a global conservation organization with about 1 million members worldwide. We work closely with communities, businesses, governments, and other organizations to preserve the plants, animals, and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Conservancy has identified the Upper Mississippi River as an important freshwater ecosystem and is focusing on restoring and conserving the ecological function, and dynamics of this floodplain-river ecosystem. The Conservancy is encouraged that we are not alone in seeking this goal as many other groups also have similar interests. We hope to accomplish our goals by working in partnership with others, including the U.S. Fish and Wildlife Service (Service). We view Trempealeau National Wildlife Refuge, with its matrix of floodplain forests, wetlands, and prairies, as an important element to the Upper Mississippi River system.

**2. Refuge vision and goals:** Overall, the vision statement and goals identified for the Refuge in the CCP are reasonable and appropriate.

**3. Priority actions needed to restore ecosystem health:** The Conservancy has identified the following goals as critical for achieving a healthy ecosystem for the Upper Mississippi River:

- a) Restore bluff-floodplain mosaic (i.e., the ecosystems extending from the main river channel through the floodplain and up to the bluffs), including functional interaction with the rivers that run through them by
  - restoring ecological function to the floodplain,

## The Nature Conservancy Comment, Page 2

- restoring more natural flows to the river and floodplain, and
  - addressing the threat of invasive and nuisance species.
- b) Restore the stability and integrity of tributary streams to naturalize flows and reduce sediment, nutrient and chemical loads ultimately being delivered to the Upper Mississippi River.
- c) Protect and restore bluffland and terrace habitats adjacent to the Upper Mississippi River.

Alternative C addresses all of these goals, directly or indirectly. As the Service moves forward with finalizing and implementing the CCP, we encourage you to emphasize actions that contribute to accomplishing these goals. This is important not only for the health of the Refuge but also for the health of the Upper Mississippi River.

Actions identified in the CCP that we feel are particularly important include:

- a) Increased water level management in summer to mimics natural conditions to the extent possible
- b) Undertake aggressive actions to reduce the introduction and spread of invasive plants.
- c) Improved protection of endangered and rare species and implementing reintroductions.

The Conservancy understands that the Service has limited resources to expend on management of Refuge, but we encourage you to set priorities as you implement the CCP that target protecting and managing biodiversity to ensure their viability into the future.

We hope these comments help you as you finalize the CCP. Thank you for considering them. We look forward to working with you in the future to restore and protect the health of the Refuge. Please call me at (608) 251-8140 if you have any questions or want to discuss these issues further.

Sincerely,



Mary Jean Huston  
State Director  
The Nature Conservancy in Wisconsin

## The Humane Society of the United States Comment, Page 1



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August 10, 2007

**VIA FAX 608-539-2703**

Trempealeau National Wildlife Refuge  
Attention: CCP Comment  
W28488 Refuge Road  
Trempealeau, WI 54661-8272

**RE: Comments on Draft CCP for Trempealeau National Wildlife Refuge**

Dear Refuge Manager:

On behalf of the nearly 10 million members and supporters of the Humane Society of the United States and The Fund for Animals (hereinafter collectively "HSUS"), over 200,000 of whom reside in Wisconsin, The HSUS submits the following comments to be considered on the Draft Comprehensive Conservation Plan (CCP) for Trempealeau National Wildlife Refuge (Refuge).

### Legal Precedence

The HSUS is opposed to the draft plan and believes that the action proposed represents a continuing violation of federal law, namely the National Environmental Policy Act (NEPA), given the U.S. Fish and Wildlife Service's (FWS) ongoing failure to prepare an Environmental Impact Statement (EIS) on its national wildlife refuge sport-hunting program or, more broadly, its overall refuge recreation program.

While the FWS apparently believes the National Wildlife Refuge System Improvement Act (NWRISIA) provides it carte blanche approval to allow sport hunting on Refuges, the Act retains and reemphasizes the compatibility requirements and imposes other standards that require more, not less, biological and ecological evidence to support decisions to open refuges to sport hunting activities. See 16 U.S.C. § 668dd(a)(2); see also Complaint filed in The Fund et al. v. Williams et al., Civ. No. 03-677. Nor does the NWRISIA relieve the FWS of its obligations to consider the environmental impacts of, and alternatives to, the agency's decisions with regard to hunting in the Refuge system when preparing CCPs.

**Promoting the protection of all animals**

2100 L Street, NW, Washington, DC 20037 ■ 202-452-1100 ■ Fax: 202-778-6132 ■ [www.hsus.org](http://www.hsus.org)

## The Humane Society of the United States Comment, Page 2

The HSUS does not believe that sport hunting is compatible with the purposes for which many Refuges were created. See 16 U.S.C. § 460k. Moreover, there is no indication that the FWS ensured the availability of sufficient funds before it approved sport hunting initially at the Refuge and must, therefore, do so now if the FWS intends to continue to authorize and/or expand hunting under the CCP. *Id.* § 460k(b).

The proposed CCP must take into account not only the effects of hunting on other wildlife species in the Refuge, but also the cumulative impacts of hunting on wildlife, migratory birds, and non-hunting visitors to Refuges throughout the Refuge System before permitting hunting to continue via CCP. The FWS has effectively admitted that its NEPA compliance on Refuge hunting and, indeed, all Refuge recreational and use activities, is lacking given its failure to ever complete its Refuges 2003 Plan and EIS (herein incorporated by reference). That Draft EIS, which was published on January 15, 1993, conceded that the National Wildlife Refuge System was experiencing a crisis in terms of increased use, increased damage to biotic and abiotic resources, increased user conflicts and, specifically, identified a number of potential adverse impacts associated with refuge hunting programs (i.e., disturbance to feeding or resting waterfowl; trampling of low ground vegetation; soil compaction and/or erosion; abandonment of nest sites and reduced productivity and survival; increased visitation resulting in a negative effect on refuge biodiversity; adverse impacts on the distribution, relative abundance, and sex and age composition of wildlife; changes in wildlife behavior due to increased disturbance by hunters).

To date, no final EIS has been published nor has the FWS explained the status of Refuges 2003 or why it has apparently elected to halt the process midstream. The FWS cannot, on the one hand, initiate an EIS process conceding that the environmental impacts of hunting and other Refuge uses have not been adequately evaluated only to, on the other hand, halt the process and then continue to open Refuge after Refuge to hunting with no substantive analysis of the Refuge-specific or program-wide impact of the activity on wildlife or the refuge system itself.

Considering the various reports published over the past several decades emphasizing the adverse impacts of Refuge uses, including hunting activities, and the abject failure of the compatibility determination process in preventing incompatible uses (see, e.g., Leopold Committee report, the FWS report entitled *Field Station Threats and Conflicts*, the FWS report entitled *Fish and Wildlife Service Resource Problems*, and the 1989 GAO National Wildlife Refuges: Continuing Problems With Incompatible Uses Call for Bold Action), the need for an EIS cannot be disputed. The biological, ecological, social, economic, aesthetic, and other impacts inherent to the FWS's decision necessitate the preparation of an EIS to properly, objectively, and comprehensively evaluate the full range of environmental impacts associated with this action. Until and unless an EIS is prepared, the FWS cannot finalize the proposed CCP.

In addition, in preparing the CCP and NEPA document, the FWS must analyze a full range of alternatives to the proposed action, including the hunting component of the Plan. This includes considering alternatives to sport hunting for achieving the FWS's management objectives for the Refuge and the wildlife that use the Refuge. NEPA requires federal agencies

### The Humane Society of the United States Comment, Page 3

to “study, develop, and describe appropriate alternatives to recommended courses of action . . . .” 42 U.S.C. § 4332(E); 40 C.F.R. § 1508.9(b) (requiring analysis of alternatives in EAs). NEPA’s alternatives analysis is “designed to insure that an agency’s single-minded approach to a proposed action is tempered by the consideration of other feasible options that may have different (and fewer) environmental effects.” *Sierra Club v. Watkins*, 808 F.Supp. 852, 875 (D.D.C. 1991).

Finally, Section 7 of the ESA requires that each federal agency shall “insure that any action authorized, funded or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered species . . . .” 16 U.S.C. § 1536(a)(2). To comply with this mandate, before taking an action which may affect listed species, the FWS must first engage in formal consultation with any agency taking such action and produce a Biological Opinion which details the steps necessary to avoid jeopardy. *Id.* § 1536(b). In this process, the FWS reviews “the best scientific and commercial data available or which can be obtained,” evaluates the status of impacted species, determines the cumulative effects of the action, and formulates its Biological Opinion as to “whether the action, taken together with cumulative effects, is likely to jeopardize the continued existence of listed species . . . .” *Id.* § 402.14. If so, the FWS identifies alternatives which, if implemented, will avoid jeopardy. *Id.* If the action will result in a “take” of listed species, the Service must provide a take statement identifying what level, if any, of take will be permitted. *Id.* In addition, the Service identifies discretionary recommendations which will further reduce the impacts of the project on listed species. *Id.*

Prior to engaging in the consultation which results in such a Biological Opinion, an agency must prepare a Biological Assessment which contains the information that is provided to the Fish and Wildlife Service at the inception of formal consultation. The BA must present an analysis of the effects of the action on species, “including consideration of cumulative effects,” and consideration of “alternate actions considered by the Federal agency for the proposed action.” *Id.* § 402.12(f). Only if the BA concludes that a project will not adversely affect any listed species, and the Fish and Wildlife Service concurs in writing, may the agency avoid formal consultation. 50 C.F.R. § 402.13. The ESA prohibits an agency from proceeding with a project which may impact listed species before the analysis required by Section 7 is complete. 16 U.S.C. § 1536(c)(1) (BA must be completed before project begins); *id.* § 1536(d) (agency may not make irreversible commitment of resources while consultation is underway). Indeed, all federal agencies have an on-going obligation to ensure that ESA listed species are not jeopardized by their actions.

The FWS has engaged in a pattern of compromising the biological and ecological integrity of our National Wildlife Refuges by providing hunters the opportunity to kill for fun and sport the variety of wildlife species that inhabit these Refuges. The fact that the public overwhelmingly rejects hunting of wildlife on National Wildlife Refuges – lands that most believe should be sanctuaries for wildlife – is evidently immaterial to the FWS.

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## The Humane Society of the United States Comment, Page 4

### The Role of Non-Consumptive Wildlife Recreation

The impact of hunters and hunting on non-consumptive Refuge users has also not been of significant concern to the FWS despite a fundamental purpose of the Refuge system to provide recreational opportunities (including non-consumptive opportunities). Considering that far more people use the Refuge to observe, enjoy, and photograph wildlife compared to the number of people who use this Refuge for hunting, the impacts of expanded hunting on the experience and potential socioeconomic contribution of these non-consumptive users must be taken into account.

The number of hunters has steadily declined over the last few decades. This trend is so startling, that the *Wildlife Society Bulletin* produced an issue dedicated to the topic of the changing trends in attitudes towards and participation in the “consumptive” use of wildlife. Data from the U.S. Department of Fish and Wildlife reveals that the number of hunters declined 18% from 1975 until 2000 with a 7% decline occurring between 1991 and 2001. <sup>i ii</sup>

A study in Alabama found that the precipitous decline in hunting license sales in that state could be attributed to a lack of time and interest on the part of former hunters. The study also revealed that 2/3 of all non-hunters did not want to see animals killed for recreation. <sup>iii</sup>

Surveys and studies reveal that social, economic, and cultural changes over the last 30 years have resulted not only in a drop in the number of hunters but also a shift in the focus of wildlife manager education from consumption to conservation. <sup>iv v</sup> In fact, one study indicated that those who had been in the wildlife profession for less than 5 years as of 1998 were much less likely to support the consumptive use of wildlife than those who had been in the profession for over 20 years. <sup>iii</sup>

A study that examined participation in wildlife-related activities in Canada revealed a similar trend. That analysis showed that the probability of participating in waterfowl hunting decreases with birth year and age. Not only is the number of young hunters decreasing every year, but the overall number of hunters is also decreasing. Additionally, the study revealed that the probability of participation in wildlife viewing has greatly increased over the last three generations. <sup>vi</sup>

From an economic standpoint, non-consumptive wildlife uses continue to increase revenue for local governments while the money spent on hunting has not kept pace with inflation. In 1991, non-consumptive wildlife enthusiasts spent \$18.1 billion on all aspects of their hobbies while hunters spent \$12.3 billion. <sup>vii</sup> In 1996, non-consumptive expenditures were up to \$29.2 billion while hunters spent \$20.6 billion. <sup>viii</sup> In 2001, the most recent date for which data is available, non-consumptive expenditures had increased to \$38.3 billion while hunting expenditures remained the same at \$20.6 billion, despite inflation. <sup>ix</sup> Even in this small subset for which data is readily available, it is clear that hunting expenditures and participation are down while non-consumptive wildlife activities are on the rise.

Such a small segment of the population currently participates in hunting and this number is dwindling with each passing year. The minority status of hunters also extends to patrons of

## The Humane Society of the United States Comment, Page 5

National Wildlife Refuges. The 2004 economic benefit analysis of National Wildlife Refuge Visitation clearly states that 68% of the revenue from National Wildlife Refuges is from non-consumptive users, 27% from fishing activities and only 5% from hunting.<sup>x</sup> This report also states that “[s]urveys show refuge visitors would have been willing to pay more for their visit than it actually cost them.” This is known as a consumer surplus. This same survey revealed that 63% of the potential consumer surplus is derived solely from non - consumptive visitors.

FWS must begin to realize the revenue potential of non-consumptive wildlife patrons and begin to reform their revenue base around this rapidly increasing segment of the population. The Refuge should conduct a survey of consumptive versus non-consumptive visitors to the Refuge in order to assess the economic input of each group. These data may be used to assess whether hunting is an economically viable option for the refuge or if it is simply retained as a means to appease a vocal minority.

The FWS has ignored these data and failed to capitalize on the potential economic gain that would come from these non-consumptive users. This seems especially foolhardy in light of the fact that budget and cost woes are often highlighted in the *Refuge Update* newsletter.<sup>xi</sup> Additionally, the wildlife experience of non-consumptive patrons can only be enhanced by the elimination of hunting in these refuges. The current system of setting aside small parcels of land for non-consumptive visitors while opening up large portions of the refuge to hunters is nonsensical and only serves to marginalize a lucrative majority for the sake of a dwindling minority. Removing the dangers and disturbances inherent in hunting areas and allowing for a more complete exploration of these areas for non-hunters can only lead to increased visitation and a subsequent increase in revenue from this segment of the wildlife recreation community.

### Conclusion

For all these reasons, we respectfully request that the FWS not open/expand hunting on this Refuge. Thank you in advance for considering these comments.

Sincerely,



Andrew Page  
Campaign Manager, Hunting

### Endnotes

<sup>i</sup> U.S. Department of the Interior, Fish and Wildlife Service and U.S. Department of Commerce, U.S. Census Bureau. 2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 161pp.

<sup>ii</sup> Enck, J.W. et al. 2000. Status of hunter recruitment and retention in the United States. *Wildlife Society Bulletin* 28(4): 817 – 824.

## The Humane Society of the United States Comment, Page 6

- <sup>iii</sup> Mehmood, S. et al. 2003. Factors associated with declining hunting license sales in Alabama. *Human Dimension of Wildlife* 8(4): 243 – 262.
- <sup>iv</sup> Organ, J.F. and E.K. Fritzell. 2000. Trends in consumptive recreation and the wildlife profession. *Wildlife Society Bulletin*. 28(4): 780 – 787.
- <sup>v</sup> Riley, S.J. et al. 2003. Deer populations up, hunter populations down: Implications of interdependence of deer hunter population dynamic on management. *Ecoscience* 10(4): 455 – 461.
- <sup>vi</sup> Spence, M. 2002. The effect of age on the probability of participation in wildlife – related activities: a birth year cohort study. *American Journal of Agricultural Economics* 84(5): 1384 – 1389.
- <sup>vii</sup> 1991 National Survey of Fishing, Hunting and Wildlife – Associated Recreation. Online at: <http://www.census.gov/prod/1/gen/interior/index.html>.
- <sup>viii</sup> 1996 National Survey of Fishing, Hunting and Wildlife – Associated Recreation. Online at: <http://www.census.gov/prod/3/97pubs/fhw96nat.pdf>.
- <sup>ix</sup> 2001 National Survey of Fishing, Hunting and Wildlife – Associated Recreation. Online at: <http://www.census.gov/prod/2003pubs/fhw01-us.pdf>.
- <sup>x</sup> Caudill, J. and E. Henderson. 2005. Banking on Nature 2004: The Economic Benefits to Local Communities of National Wildlife Refuge Visitation. Division of Economics, U.S. Fish and Wildlife Service, Washington DC. 442 pp. Available online: [http://www.fws.gov/refuges/policyMakers/pdfs/BankingOnNature\\_2004\\_finalt.pdf](http://www.fws.gov/refuges/policyMakers/pdfs/BankingOnNature_2004_finalt.pdf).
- <sup>xi</sup> Archives can be viewed online: <http://www.fws.gov/refuges/refugeUpdate/index.html> (Accessed March 2007).







Hello,

I am one who thinks of Trempealeau NWR as one of my favorite places for birding.

Although, I am only able to make it up there a few times each year because of the long distance from home.

Comments:

1. It would be great if there could be more open water in front of the viewing platform.

Years ago there was much less growth there and it was possible to see more interesting birds much closer. There now are pockets for birds, apparently. But the only time they can be seen is when flying in or out.

2. I like the new viewing platform. The shade is especially welcome on hot sunny days.

3. The new scopes are of descent quality that I was able to see interesting birds clearly at a distance.

4. Any improvements for bikers would be appreciated. I love biking there, but am nervous that the gravel will cut my tires when I am in the middle of the loop.

I hope to enjoy the refuge for many years to come.

Thanks for any improvement.



I know the Refuge has tried to steer visitors to viewing of grassland birds as well as marsh/waterbirds with the viewing decks. Maybe that's all you can do with species that appear or sing, then disappear and remain silent, unlike water birds that are more conspicuous.

I know you don't like "billboard" signs on the Refuge. However, signing may mark sites where in May/June, nesting birds sing on territory. Maybe a "small" sign the shape of the singing bird would be appropriate: For example, a meadowlark with head thrown back as if singing, a bob-o-link in flight-song. These would not have to be on the grasslands, but along the road near the birds. They could be moved year to year as necessary. They would also be perches for the birds, although I take no responsibility that the birds will choose "their" sign!



I find that your use of the refuge does not provide for refuge for all species. The overpopulation of the cormorant in the Trempealeau area depletes the fish population. In many states and in many countries cormorant control is a priority, but not in our area. Over the years walleye populations have gone down substantially. It would seem to me that refuge for one specie that causes destruction of another is just a cheap way of not doing your job.





deis ccp comments

xviii - invasive plants - what efforts has management made to get local nursery profiteers to stop selling exotic invasive plants to avoid national taxpayers having to shell out millions to get rid of the exotic invasives. has any collaborative effort been made to help national taxpayers here?

deer mgt is not "mgt" at all - it is simply capitulation by nwr to perverted gun wackos who need to kill to be happy - as outrageous an act as anything can be. to encourage gun wackos is insane. wildlife watchers outspend these killers and shuld be encouraged. they are peaceful and dont hurt things.

xix - hunting/killing is insane promotion of gun violence. grown men pretending its still 1860 America and they fail to recognize its 2007 now. many think these gun wackos ought to grow up, get real and help wildlife and birds instead of being murderers of wildlife.

xxii - ban all hunting and trapping. the deer murdering by gun wackos should cease.

pg 3 - a refuge shuld be a place of peace for peaceful people and wildlife not a site for people with murder and killing and violence in their hearts. what a travesty this place is.

the 1936 act of providing a place of peace has been violated by gun wacko murderers with their perverted need to kill wildlife.

pg 4 - hunting should be banned. hunting is 60th on the list of activities that americans engage in. why are you catering to this murderous tiny group of perverts when there are 59 other activities americans do as activities?

pg 6 - if your goal is to maintain habitat for wildlife, you are deluding yourself. actually your main goal seems to be to provide opportunities for gun wackos to kill wildlife. that is what is factually happening so you have lost sight or relevance to your goal.

7 hunting is not "compatible" at all with other activities. absolutely not.

pg 17 - what has management done to get local nursery profiteer businesses to stop selling exotic invasive plants - have they done anything at all?

pg 18 - no additional lands should be opened. migrating birds need protection from perverted gun wacko hunters who aer well known to shoot anything that moves.

pg 20 - the word "killing" could be substituted for "management" in almost every instance in this plan when wildlife or birds are mentioned. there is no other plan like birth control or moving animals or anything - the one method of population control is to kill the animal. what a horror that this agency isnt aware this is 2007 and birth control is available for many species. women have been using it for the last 70 years. the plan likes to deceive the public so it uses deceptive words continually. the "mgt" evidently doesnt want the public to become aware of the awful carnage that takes place at this alleged "refuge". "refuge" is misnaming this site when it operates as a killing field.

prescribed burning means when you burn mercury is released into the air. mercury is a killer. fine particulate matter is also released which can travel on air currents for thousands of miles. such fine particulate matter cannot be seen. it is microscopic. it causes lung cancer, heart attacks, strokes, allergies, asthma, and pneumonia and is a killer of people. such air pollution cannot be tolerated any more.

pg 23 - bikes are ok. letting in atvs and snowmobiles is quite another story. they are noisy. they pollute air. they scare animals and birds. this idea is horrible.

pg 42 - one has to wonder why disabled people who expect compassion from others because of their

disability can go out and wound and kill living creatures. it is maudlin. it is outrageous to allow this. it seems very perverted on the part of these people who of all should have compassion.

pg 53 - have the full ecological effects of fle beetle release been thoroughly investigated. some fo these projects end up terribly disruptive and in fact causing more harm than help.

i do not agree with tax dollars decimating black locust. leave this area alone. it is not a priority at all.

pg 58 - wildlife watching seems to be a stepchild at this "mgt". that is strange when it is the biggest moneymaker to improve economic conditions in an area. somebody in "mgt" is missing the boat here. mgt needs to look at the finances on how wildlife WATCHERS spend more than any other group.

pg 60 why arent your promoting contact with animal protection groups?

80 respect for outdoor and wildlife can be encouraged WITHOUT encouraging youth to pick up a gun to kill. to imagine that to be the right way to live is insane. i every much object to any tax dollars being used to encourage youth to kill wildlife or birds. teach them to be kind and respect God's creatures not kill. you encourage jonesboro, columbine, red lake, nickel mines and killing with this encouragement of killing.

pg 81 i object to encouraging youth to kill or to pick up and use instruments of death. this is the antithesis of civilization. i object to "learn to hunt" program. how about "learn to hike" programs - which would be more productive. i believe these program should be focused on "learn to hike" or "learn to camp". stop encouraging killing, violence, murder with tax dollars.

why are you picking choices that the public is forced into with choice a, b, c. the public can make up its own mind what it wants. they dont need to be forced into choices of govt employees. what happened to government by the people for the people?

267 - deer killing is not "compatible". crazed gun wackos put all living things at risk with this activity.

278 migratory bird killing is not "comptaible". crazed gun wackos put all living things at risk with this activity.

287 - trapping is not "compatible". all living things are put at risk with trapping.

290 ban all logging, leave the trees alone. they are needed by wildlife and birds.



I live in St. Paul and for many years have traveled to the Milwaukee area to visit my mother. The interstate is certainly the fastest route for that long trip, but because of my strong interest in birds and other wildlife, I often have chosen to extend my trip to spend time in areas where I can enjoy this hobby. Over the 30 years I have visited my mother, I would say that for at least half those trips I have deliberately chosen to spend time in the Trempealeau Refuge. Although there are a number of other attractive natural areas in western Wisconsin, it is Trempealeau that has most often ended up on my route. I always spend at least several hours there, and I relish being able to enjoy its rich bird populations and other wildlife, and its varied vegetation. It is a gem of an area, and I urge that these features be permitted to contribute prominently to the Comprehensive Plan. To diminish what they now provide to visitors to the Refuge would be a tragedy.



I am a recent graduate of Winona State University with an Ecology degree that resides in Winona. The plan is very good and would increase environmental awareness. If there is any employment opportunities please contact me. Thank You.



Since so many bird species are in decline across America, the Trempealeau Refuge could also distinguish itself by a focus on migratory bird conservation beyond that of waterfowl. Grassland birds are in dire straits due to habitat loss, and neo-tropical migrants face threats both here in their breeding grounds and on their wintering grounds. Projects helping these species with habitat and creating more public awareness are necessary. This is an area where the Trempealeau Refuge could really shine, since grassland birds and neo-tropical migrants are in evidence in the prairies and wet woodlands on the property.

We love visiting the Trempealeau Refuge and think that the prairie restoration is impressive. We also enjoy the diversity of habitat types that can be viewed on the property. My husband and I have seen wildlife there that we have not seen elsewhere. We have also experienced some thrilling up close and personal encounters with all manner of creatures. The Trempealeau Refuge is a gem in our region. Please continue to focus on conservation and habitat enhancement.

Sincerely,



To whom it may concern:

My husband and I visit the Trempealeau Refuge almost weekly year round for birding and wildlife watching. We also bird and hike there with our friends several times each year. We have also canoed and cross-country skied at the refuge on occasion. We have some comments on your Comprehensive Plan for the Refuge.

We would ideally like to see more emphasis placed on birding and other non-consumptive uses of the refuge. It seems so often that the focus at wildlife areas seems to be on hunting and fishing. There's a whole host of people like us, however, who are interested in bird conservation and opportunities to merely view and experience wildlife and native plants. We feel that we are sometimes overlooked.

We also feel that the primary focus at any wildlife "refuge" should be wildlife protection that encompasses habitat protection and enhancement; and conservation of native birds, plants, and animals. It seems that recreational users are pressing for more and more access for human use of refuge systems. It is our opinion that human recreational use of wildlife refuges is not the reason for their existence, and that any recreational uses should always be secondary to wildlife conservation and allowed only to the extent that they are not in conflict with that important mission.



Hello,

Anything you can do to maintain and enhance the opportunity for general migratory bird conservation and birdwatching at the Refuge would be helpful and appreciated. Many people enjoy watching birds and supporting the places that allow or improve the chances to see birds in natural habitats. Besides being a good way to spend time, birdwatching has positive economic impacts on surrounding areas. Please strongly consider the growing number of people interested in birds and their environment as you plan for the future of the Refuge. Thank you.

