

# Appendix L: Response to Comments Received on the Draft CCP

The Midwest Region of the U.S. Fish and Wildlife Service received approximately 500 comments on the Draft Comprehensive Conservation Plan for Swan Lake NWR.

The Draft CCP's comment period ran for 30 days and ended on July 5, 2010. The Service addressed those comments by creating a new alternative, Alternative 4, and selecting it as the preferred alternative.

Three objectives drew the most comments:

- The proposal to vary water levels in Silver Lake instead of maintaining the impoundment at full pool.
- The proposal to restore all 1,400 acres of existing cropland to native habitat.
- The proposal to manage Refuge grasslands to support the eastern massasauga rattlesnake.

The comment period for Alternative 4, the new preferred alternative, ran for 30 days and closed on Oct. 4, 2010. The Service received approximately 50 comments on the new preferred alternative.

This appendix includes two sections, Draft CCP Comments and Alternative 4 Comments. To avoid repetition, all of the comments expressing identical opinions are not included in this appendix. In cases where there were multiple comments expressing the same opinion, one representative comment and the Service's response to that comment are shown. In other instances, several comments are listed that share a common response.

## Comments on the Draft CCP

### **Waterfowl hunting in and around Swan Lake NWR would be drastically reduced if management of Silver Lake changes.**

The CCP states that water management on Silver Lake will not change until we have collected additional hydrological data. That is expected to take a minimum of 5 years. We expect waterfowl use of the Refuge and the quality of waterfowl hunting to continue at or above present levels.

### **Lack of sufficient hunting blinds has diminished the quality of goose hunting on the Refuge.**

The Service recognizes that goose hunting on the Refuge has changed over time. . As identified in the CCP, hunting opportunities on the Refuge will be re-evaluated so that the Service can provide hunting opportunities that are consistent with purposes for which the Refuge was established.

### **Swan Lake NWR should be treated as a wildlife sanctuary with no hunting or trapping allowed.**

Trapping is not allowed as a recreational activity on the Refuge. The National Wildlife Refuge System, is guided by laws enacted by Congress and the President as well as policy derived from those laws. The 1997 National Wildlife Refuge System Improvement Act identifies hunting as one of six priority public uses to be facilitated when compatible with the purposes of a refuge and the mission of the Refuge System. Hunting is consistent with the purposes of the Refuge. While National Wildlife Refuges are managed first and foremost for wildlife the focus is on perpetuating populations not individuals.

**Hunting on the Refuge should be limited only to those individuals unable to hunt in the traditional manner due to disabilities.**

The Service has and will continue to provide recreational opportunities to hunters with disabilities; however, we will not limit these opportunities to disabled hunters.

**Regarding the proposed hunting changes, we would rather see waterfowl hunting in the present areas only.**

**Expand hunting opportunities, but carefully consider the location, duration, and extent of new opportunities.**

**We desire more public access for waterfowl hunting and feel it is appropriate to allow duck hunting on the Refuge.**

**We desire more public access for small game hunting and feel it is appropriate to allow it on the Refuge.**

**We support providing limited goose hunting and deer hunting opportunities.**

**Please open up more hunting opportunities at Swan Lake. We need all the public hunting land we can get for people who don't have access to private land.**

The selected alternative (Final CCP) calls for introducing duck hunting and small game hunting on the Refuge as well as maintaining existing hunting opportunities for geese and white-tailed deer. The details regarding new hunting opportunities must be evaluated in a subsequent analysis that requires additional public involvement and review. The location, duration, and extent of hunting opportunities as well as maintaining a portion of the Refuge as a sanctuary free of hunting will be important considerations as we develop the Refuge hunting plan. We expect this process to begin within two years of approval of the Final CCP.

**We support providing hunting opportunities for youth and people with disabilities.**

The Service shares this view and will identify areas that will be accessible to persons with disabilities when a new hunting plan is prepared for the Refuge. We expect the plan to be complete in 3-5 years.

**The decline of quality goose hunting is directly related to not providing quality water and crops for the geese during migration.**

The relationship between migrating geese and hunting opportunities is complex and in all likelihood is constantly changing. The number of geese in the local area as well as the distribution and movement of whatever numbers are present are factors that affect goose hunting opportunities. Canada Goose use of the Refuge has declined from a peak of 181,000 in 1977 to present levels of 20,000 to 40,000 birds. The decades following the peak saw a steady decline in the num-

ber of geese wintering on the Refuge despite a steady increase in Canada Goose numbers within the Mississippi Flyway. During this same time there was abundant water on the Refuge and according to Refuge records about 2,000 acres of cropland maintained annually. This supports research that shows distribution of wintering geese is influenced by factors beyond the Refuge which include increased availability of habitats across the landscape, fall and winter weather conditions, and variations in hunting pressure along the migratory flyway. Locally, movement and distribution of wintering geese are influenced by the availability of rest areas and food resources. Historically, cropland was used to provide food for wintering geese, but current Service policy calls for restoring native habitat. Cropland is not native habitat, and although it attracts wildlife including geese, it is not as diverse as native habitat and the food produced is available to a limited number of species. Swan Lake NWR is part of a larger conservation network, the National Wildlife Refuge System, and is not solely dedicated to providing food for wintering geese. The primary purpose of the Refuge is to provide habitat for migratory birds. In addition to waterfowl, this includes many other water birds and migrant landbirds.

**Area residents and visitors highly value fishing on Silver Lake.**

We received many comments regarding the value of fishing on Silver Lake; these ranged from its economic value to its value in building family connections. It is clear many people have a strong association with this activity. Nevertheless, the establishing purpose of the Refuge primarily is to provide for the needs of migratory birds. This includes Silver Lake, which was originally constructed to benefit migratory birds. While we recognize the value of fishing to many Refuge visitors, we are obligated to provide the highest quality habitat for the wide range of migratory birds that use the Refuge. Under the selected alternative we will continue to provide fishing opportunities at Silver Lake, but also will continue to collect additional data to help develop options for managing the water levels in the lake to increase the amount of food for migratory birds. If water management occurs, it would impact the amount and type of fish in Silver Lake as well as the opportunities to fish there.

**The Refuge should improve Silver Lake's access, upkeep and fishery.**

Under the CCP fishing opportunities at Silver Lake would continue, but could be affected if water levels are managed to increase native foods for waterfowl. The primary purpose of Silver

Lake is to help the Refuge meet its mandates for providing Refuge and a breeding area for migratory birds and other wildlife.

**Silver Lake is more accessible for elderly and disabled anglers than bank or river fishing.**

Providing accessible wildlife dependent recreational opportunities for the public is a priority of the Service. Under the CCP fishing opportunities at Silver Lake would continue, but could be affected if water levels are managed to increase native foods for waterfowl. If water levels are changed and fishing continues to be allowed on Silver Lake, the Service will ensure that fishing opportunities are available for persons with disabilities.

**I would like to see the inner refuge roads remain open for wildlife viewing/photography.**

The CCP includes direction to provide public access to the entire Refuge from early March through late October, and allow limited access to selected portions of the Refuge from late October to early March.

**We support expanding visitor services opportunities on Swan Lake NWR, but not at the expense of the sanctuary function of the Refuge.**

We agree. Under the CCP a portion of the Refuge will continue to be maintained as a sanctuary.

**Witnessing the spring and fall migrations of birds and viewing whitetail deer are what many people come to the refuge for.**

Viewing annual bird migrations as well as white-tailed deer are popular activities on the Refuge. We expect migratory birds and white-tailed deer to continue using the Refuge and the CCP includes direction to provide wildlife observation opportunities.

**How do you plan to segregate the hunters and birders?**

We will complete a hunting plan as part of a broader plan for all visitor services. As part of that planning effort, we will work to minimize conflicts between user groups.

**We prefer the visitor opportunities available with open water on the Refuge.**

Open water and the visitor services associated with them will continue under the CCP. The amount of water in Silver Lake, which makes up the majority of open water on the Refuge, is not proposed to change until completion of additional study and completion of a habitat management plan. If water levels in Silver Lake are managed it would affect the amount of open water and associated opportunities.

**The bird check list Appendix C is out of date.**

We reviewed and revised the bird list.

**We disagree with some aspects of Alternative 3 but like its environmental education elements.**

Alternative 4 was selected as the CCP for the Refuge. Alternative 4 differs from Alternative 3 in a number of ways, but retains the objective for environmental education.

**As tax payers, we expect the Service to maintain Swan Lake NWR in the manner that area residents want.**

The establishing purpose of the Refuge primarily is to provide for the needs of migratory birds. We are obligated to provide the highest quality habitat for the wide range of migratory birds that use the Refuge.

**Unhappiness over Refuge planning will reduce visitation and volunteerism at the Refuge as well as private conservation efforts.**

Many people continue to visit and support the Refuge. We will work with the Friends group and others to grow those numbers as we implement the CCP. We will also continue to encourage private conservation efforts. At times comprehensive conservation planning produces conflict. It is challenging to produce a plan that addresses issues identified by the public, the Service, and others in a way that fulfills the purposes of the Refuge and the mission of the National Wildlife Refuge System, and that also adheres to Service policies. We have invited public comment throughout this process and made changes based on those comments. We will continue to engage the public and build support as we carry out the direction in the CCP.

**It appears that the FWS doesn't care about area residents.**

The Service has invited public comment throughout this process and made changes based on those comments. We will continue to engage the public and build support as we carry out the direction in the CCP.

**Partner with MDC and Ducks Unlimited.**

The Service has and will continue to partner with MDC and Ducks Unlimited.

**Some of the people who offered comments said that they strongly value having large flocks of migratory waterfowl on Silver Lake both for observation and hunting purposes. They said that changing water levels in Silver Lake will diminish the spectacle of annual migration and the quality of hunting opportunities at Swan Lake NWR and could compromise the health of migratory waterfowl.**

As identified in the CCP, any future changes on Silver Lake will only be taken after further review of the hydrology of the watershed. Chang-

ing water levels on Silver Lake will only move forward if the Service believes that it will improve habitat for migratory birds and other wildlife at the Refuge.

**Some people expressed strong opposition to draining Silver Lake. Some people noted that there are other ways to control carp, some said that the impoundment is important to managing habitat, some said the Refuge has an obligation to preserve Silver Lake the way it is, and some said that it is an invaluable draw for tourists.**

The Service is not proposing to drain Silver Lake. We recognize that Silver Lake provides water for other wetland management units on the Refuge; however, the Service does not have an obligation to preserve Silver Lake. We have an obligation to manage the Refuge for its establishing purposes, which is for migratory birds and other wildlife.

**Many people summarized their view on management of Silver Lake as “if it ain’t broke don’t fix it.” While this sentiment was the bottom line, the reasons why people believe Silver Lake functions well included: quality fishing, quality duck hunting, ability to maintain a guaranteed source of water, preserving community heritage, the need to improve the lake.**

As identified in the CCP, no change in the management of Silver Lake will occur unless future hydrological studies suggest that active management of Silver Lake water levels will benefit migratory birds and other wildlife.

**Some people opposed changing the management of Silver Lake because they see it providing a guaranteed source of water for moist soil management at no cost to the Refuge. Additionally, converting and maintaining habitat within the Silver Lake basin would be more expensive than open water.**

The Service is not proposing to drain Silver Lake. We recognize that Silver Lake provides water for other wetland management units on the Refuge; however, the water being maintained within Silver Lake does have costs. Maintaining reservoir conditions in Silver Lake precludes the establishment of other wildlife habitat. Additionally, maintenance of infrastructure associated with Silver Lake is not without its costs. Periodic dam safety inspections, vegetation control and a variety of other maintenance costs must be considered when suggesting that the Silver Lake reservoir is maintained at “no cost” to the Refuge.

**People opposing the proposal to vary water levels in Silver Lake said that the Service has an obligation to improve the lake and manage it as open water, and they suggested a variety of techniques for doing so.**

The Service does not have an obligation to improve the lake and manage it as open water. The Service is mandated to manage the Refuge,

and its habitats, for its establishing purposes, which is for the benefit of migratory birds and other wildlife.

**Many people voiced concern that changing Silver Lake in any way would diminish recreational uses to the point where the local and regional economy would be imperiled.**

The CCP is not proposing changes for Silver Lake. Any future changes of the management of Silver Lake will take into consideration those effects on the recreation and the socioeconomic effects.

**Many people voiced concern that the proposed management would result in a fish kill similar to what occurred in 1989 when Silver Lake was completely drawn down.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. If future changes to the management of Silver Lake are proposed the Service will take fishery management issues into consideration during that planning effort.

**Sumner is known as the “Goose Capital of the World,” and many people expressed concern that changing the management of Silver Lake would be detrimental to geese and, with it the community’s identity. In addition, Silver Lake has been central to family outings over the years and many people said that proposed changes to how the lake is managed would diminish good memories and lessen opportunities for future family outings at the lake.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made without an assessment of how such changes would affect migratory bird habitat and the value of the Refuge to the American public.

**Silver Lake serves as a catch-basin for reed canary grass seeds, slowing or preventing the spread of the invasive plant on the Refuge.**

Reed canary grass and other invasive species travel via a number of pathways and it requires constant action to slow or eliminate their spread. A number of strategies in the CCP call for treating known infestations of invasive species and monitoring common invasive pathways such as streams, waterways, roads, and trails to aid in early detection.

**Reed Canary grass is capable of forming monotypic stands that preclude other herbaceous vegetation and is particularly well adapted to the wet soils typical of many areas of the Refuge.**

**Some individuals said that Alternative 3 would result in more flooding on neighboring land and a shift in the beaver population, which would be detrimental to neighboring land owners.**

Under any of the Alternatives, the Service would not intentionally flood neighboring land without a landowner agreement or flowage easement. It is difficult to evaluate how Alternative 3 would shift beaver populations.

**Please do not make any major changes, but return to similar management practices that were in place when MDC was in charge prior to 2000.**

The Service has managed the Refuge since it was established in 1937. At one time, MDC did carry out certain activities on the Refuge through an agreement with the Service. The CCP maintains many long standing management practices used on the Refuge, but it also includes a number of changes. Management direction included in the CCP helps fulfill Refuge purposes and responds to planning issues in a way that is consistent with Service policy.

**Managing water levels in Silver Lake is not consistent with Refuge purposes.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made unless the Service believes that those changes would improve habitat for selected migratory birds and other wildlife.

**Silver Lake as a stable open water body is key to wild-life-dependent recreation in the area. It is a place where families can introduce children to fishing and nature, seniors can enjoy fishing and observation,, and everyone can enjoy the lake's beauty.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made without an assessment of how such changes would affect migratory bird habitat and the value of the Refuge to the American public.

**Silver Lake provides unique opportunities for the local area.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made without an assess-

ment of how such changes would affect migratory bird habitat and the value of the Refuge to the American public.

**The Refuge's management has diminished Swan Lake's value for wildlife habitat and food, and varying its water levels will have the same effect on Silver Lake.**

Multiple years of high water in the area have prevented the Service from managing Swan Lake for the greatest benefit of migratory birds. As Swan Lake has converted from a wetland dominated by plants typical of early successional communities (millet, smartweed) to one dominated by plants typical of later successional communities (river bulrush), food resources for migrating ducks likely have decreased.

**Managing water levels in Silver Lake will not reduce sedimentation.**

We agree, upstream land practices are the key to the amount of sediment entering Silver Lake.

**Stable open water provided by Silver Lake is essential as habitat and food for wildlife, including waterfowl, fish, and the predators that depend on them.**

The amount of water in Silver Lake is not proposed to change until completion of additional study and completion of a habitat management plan. Open water is important to some species, but maintaining reservoir conditions in Silver Lake precludes the establishment of other wildlife habitat. If water levels in Silver Lake are managed it would affect the amount of open water and associated species.

**Managing water levels in Silver Lake puts an otherwise guaranteed source of water at risk. Especially in dry years, there won't be enough water to manage refuge wetlands and support waterfowl numbers, which could change migration patterns. Managing water levels in Silver Lake should not happen at all, or should not happen without further study.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made unless the Service believes that those changes would improve habitat for selected migratory birds and other wildlife.

**Pumping ground water to compensate for lack of surface water would be expensive, may not be sufficient or timely, and could affect the local aquifer. This should not happen at all, or should not happen without further study.**

We agree that further study would be necessary to assess the feasibility of groundwater use.

**We like how the plan decreases open water and increases emergent wetland, wet meadow, shallow emergent wetland, shrub swamp and maintains bottom land Forest. It appears the Refuge is going to become a better waterfowl location than it is currently.**

It is the intent of the Service that the CCP result in a Refuge with more favorable habitat for migratory birds, including waterfowl.

**Base management on hydrology studies, then conduct drawdowns incrementally and monitor results before proceeding.**

The Service is not proposing to alter management on Silver Lake until further hydrological studies are complete. That is expected to take a minimum of 5 years. Any future changes on Silver Lake would not be made unless the Service believes that those changes would improve habitat for selected migratory birds and other wildlife.

**If you do anything, you should plant more row crops and increase the surface water.**

Service policy restricts the use of non-native plant communities (e.g., row crops) unless they are needed to meet the purposes of the Refuge. The Service believes that the Refuge will better meet its purpose by converting 1000 acres of row crops to more natural habitats. Surface water can provide resting areas to certain species; however, the Service believes that wetlands with diverse plant communities will provide better habitat resources to a wide range of migratory birds.

**Reduce cropland acres incrementally and, as desirable wetland plants replace them, monitor the effects before proceeding.**

The conversion of cropland will occur incrementally over the next 15 years. The CCP also calls for developing an Inventory and Monitoring plan that links monitoring to management information needs.

**Converting land from row crops to wetland vegetation will cost more and require more effort from Refuge staff.**

In some cases managing wetlands or native vegetation requires more effort from staff, in other cases it requires less. Cost is an important factor, but it is not the sole factor in determining management actions. Converting cropland to native habitats is consistent with Service policy and provides habitat for a wide range of migratory birds and other wildlife which helps fulfill Refuge purposes.

**Cropland on the refuge greatly reduces the crop depredation on private landowners' crops; eliminating crops on the Refuge would suggest that the Service doesn't care about impacts to neighboring lands.**

Crop depredation by wildlife is a challenge for any farming operation. The Missouri Department of Conservation sets population objectives for resident wildlife and the Refuge works closely with MDC to help achieve the objectives. Maintaining wildlife populations at specified levels helps alleviate crop depredation. As far as waterfowl impacts on agriculture, Alternative 4 will leave some crop lands on the Refuge that will emphasize more winter browse for migratory birds.

**There is no way that natural habitat will provide sufficient food for wildlife, and reducing the amount of corn and soybeans available at Swan Lake NWR will force waterfowl and other wildlife to move elsewhere.**

Agriculture draws some species of wildlife, however native habitat is a better source of food and it is a source of food for more species than row crops. Typically, highly adaptable species like white-tailed deer and Canada Geese respond to agriculture; declining species, grassland bird species for example, have a greater need for native habitat. Refuges throughout the Midwest have reduced their farming programs without experiencing lower numbers of migrating waterfowl or other wildlife.

**Instead of the "all or nothing" approach as outlined in your Alternatives 1 & 2, why not compromise and leave possibly a third of the crop land as food plots?**

This is the approach included in the selected alternative (CCP). Cropland will be reduced from 1,365 acres to approximately 400 acres by the end of the planning period.

**Continue to farm existing croplands on Swan Lake NWR because cropland:**

- adds to the diversity of Refuge habitat
- provides food and cover for wildlife
- holds ducks on the Refuge
- enhances wildlife observation opportunities
- creates income for farmers

Agriculture draws some species of wildlife, typically highly adaptable species like white-tailed deer, mallards, and Canada Geese. However, native habitat is a better source of food and it is a source of food for more species than row crops, especially those with declining numbers such as grassland birds. Reducing the amount of row crops is not unique to Swan Lake NWR's CCP. Service policy requires refuges to maintain or restore habitat to historic conditions if doing so is feasible and does not conflict with refuge pur-

poses. Farming is not an establishing purpose at Swan Lake NWR, and we cannot justify the existing acreage in row crops. However, the availability of native seed, staff, and funding limit the amount of cropland that can be restored to other habitats in any given year. Therefore, the change from cropland to other habitats will be gradual over a number of years. By year 15 of the plan, approximately 400 acres will still be in crops, as well as additional periodic cropping within moist soil units.

**Perhaps agriculture can be used as a tool for managing more natural environments on a rotational bases as opposed to planting the same areas over and over.**

Cropping is a valuable tool to maintain agriculturally developed areas until resources are available for restoration. We also recognize its value in management where agriculture can be utilized in moist soil management to set back succession of perennial vegetation and other undesirable plants. It can also be utilized in areas overly infested with invasive plants as a first step in restoring more native habitats.

**More deer moving off the refuge and across highways will cause much more danger to motorists also.**

We work closely with the Missouri Department of Conservation to help achieve white-tailed deer population objectives by providing hunting opportunities on the Refuge. Maintaining deer numbers within specified levels reduces habitat degradation and helps reduce deer/vehicle collisions.

**Is it feasible to restore historic conditions and eliminate cropland under the refuge purpose to provide habitat for migrating waterfowl and other resident wildlife?**

Converting cropland to native habitats does help fulfill the Refuge purpose of providing habitat for migratory birds and other wildlife. Agriculture draws some species of wildlife, typically highly adaptable species like white-tailed deer, mallards, and Canada Geese. However, native habitat is a better source of food and it is a source of food for more species than row crops, especially those with declining numbers such as grassland birds.

**How will the Refuge manage succession, especially woody vegetation, as it moves from crops to restoring native habitat?**

Management tools such as prescribed burning, grazing, and mowing will be utilized to manage succession.

**We support the proposal to reduce cropland on Swan Lake NWR. Most waterfowl managers would agree that the need for corn to feed the Eastern Prairie Population of Canada geese has been diluted with time, and a large chunk of the area is already planted to row crops.**

It is Service policy that when feasible and consistent with refuge purpose(s) we restore and manage habitat to maintain or increase biological integrity, diversity, and environmental health.

**We also suggest consideration of an "engineered wetland community" using the CP-23 E practice used elsewhere in Missouri. For example, by obtaining a topographical survey of the site, the Service could restore and manage an emergent wetland/moist soil/rowcrop area buffered by a wet mesic prairie on this higher deck crop ground.**

We will consider a variety of options for habitat arrangement as we develop a step down management plan with additional details on the location of future habitats. The step down plan will draw on the results of a hydrogeomorphic study of the Lower Grand River Watershed as well as additional monitoring data.

**Adequate moist soil habitat exists on Swan Lake NWR without draining Silver Lake.**

The amount of water in Silver Lake is not proposed to change until completion of additional study and completion of a habitat management plan. Specific actions and arrangement of habitats will be included in a step down management plan which will be guided by results of a hydrogeomorphic study as well as additional monitoring data.

**Converting moist soil habitat to wet meadow is a terrible idea. Moist soil habitat is more valuable to waterfowl and other wildlife than wet meadow habitat, especially in cold weather, less expensive to maintain, and would lead to reed canary grass infestation.**

The CCP includes direction to increase the amount of wet meadow habitat, but not at the expense of moist soil habitat.

**Any management action promoting the eastern massasauga rattlesnake at Swan Lake NWR is unwelcome for a variety of reasons:**

**Venomous snakes are a threat to children and other visitors, as well as hunting dogs.**

**An expanded range for the snake would translate to limitations on management actions on the Refuge.**

**The Refuge has enough eastern massasauga rattlesnakes.**

**The Refuge was established to provide waterfowl habitat, not snake habitat.**

The Draft CCP included "Objective 2.3: Eastern Massasauga Rattlesnake," however the objective was not included in Alternative 4, which is the basis of the completed CCP. The Eastern massa-

sauga rattlesnake is a candidate for listing under the Endangered Species Act. Although we eliminated the objective for the snake, the Service is obligated to manage habitat in a way that helps maintain the existing population that occurs on the Refuge.

**Figure 11 only shows a small amount of emergent wetland and Silver Lake is non-existent. How will the land cover on this map provide habitat for migrating waterfowl?**

Figure 11 in the Draft CCP is not the future land cover map, it shows potential water movement and likely associated vegetation. Figure 12 shows the 15-year desired land cover and includes Silver Lake and emergent wetland habitat.

**Both open water and row crops are essential to keeping waterfowl on and in the vicinity of the Refuge.**

Open water and crops benefit certain migratory bird species; however, other managed habitats, such as moist soil managed areas also provide beneficial resources to waterfowl and a variety of other wetland species. Open water does provide rafting areas for waterfowl, including diving ducks, but these open water habitats are devoid of vegetation and lack food resources for waterfowl. While picked crop fields (e.g., corn) can provide feeding opportunities for species such as Canada geese and mallards, they provide little to no food resources for diving ducks, rails, herons, egrets and many other migratory waterbirds.

**Alternative 3 would result in decreased numbers of waterfowl on Swan Lake NWR, which would:**

- Diminish the spectacle of migration
- Affect species that prey on ducks, such as eagles
- Diminish the area's ability to absorb changes in migration that might occur because of the devastating Gulf oil spill

We believe all alternatives suggested within the CCP would continue to allow the Refuge to meet its purpose to provide habitat for migratory birds and other wildlife. While waterfowl numbers may vary between alternatives, each would provide critical migration habitat that would likely result in relatively large concentrations of migratory birds.

Because Swan Lake NWR is a mid-migration stop-over, it cannot be conclusively stated that habitat at this latitude mitigates negative consequences of the gulf oil spill.

**Is native upland prairie a suitable habitat for migrating waterfowl?**

Typically, upland prairies are not flooded and only provide nesting cover for waterfowl.

**What benefit does wet meadow habitat provide to migrating waterfowl?**

When flooded, particularly during spring migration, wet meadows provide suitable habitat for migrating waterfowl. During spring migration, waterfowl are engaged in pairing and courtship behavior and flooded meadows provide food resources and areas for courtship and pair bonding activities.

**How will the historic hydrologic functions benefit waterfowl at Swan Lake?**

Restoring hydrologic function may or may not benefit waterfowl depending on the location. Removing a flood control levee and permitting inundation of crop fields would increase wetland habitat and benefit waterfowl; however, removal of levees and restoring hydrologic function in another location may convert a man-made wetland into a prairie thus benefitting grassland nesting birds and other species such as Eastern massasauga rattlesnakes

**Will the results from the hydro geomorphic evaluation identify ample and adequate opportunity to provide suitable managed habitat for current levels of migrating waterfowl?**

The purpose of the hydrogeomorphic modeling (HGM) evaluation is not intended to identify suitable managed habitat for current levels of migrating waterfowl. It is intended to help identify restoration potential within the Lower Grand Watershed. While not the intended purpose of the HGM, the modeling effort should identify areas within the Lower Grand Watershed that would most appropriately be managed for migrating waterfowl.

**Draining Silver Lake and the fish that presently help to feed the Bald Eagles could only harm the present population.**

Any decision made during the Habitat Management Planning (HMP) process with regards to managing water levels on the Silver Lake Basin will take into consideration its impacts on all wildlife species especially migratory birds and endangered species.

**Manage the refuge for what it was intended for: waterfowl.**

The purpose of Swan Lake NWR is for the management of migratory birds which includes waterfowl as well as many other waterbirds, shorebirds, and landbirds. We recognize and understand the association of waterfowl and Swan Lake NWR. Waterfowl management will be an important management aspect of Swan Lake NWR for the foreseeable future. In the vast

majority of cases managing for all migratory bird species is not in contradiction to managing for waterfowl.

**Improve facilities including boat ramp access and rest rooms, and staff the visitor center on weekends.**

Facility management is an important part of delivering a quality visitor services program. Swan Lake will maintain and improve these facilities within budget and staffing capabilities. Improvements beyond the existing visitor use facilities will be outlined in the Visitor Services Plan.

Swan Lake NWR has already implemented a Work Camper program that allows work camper volunteers to keep the Refuge visitor center open on weekends from March through October.

**The livelihood of many people in the area depends on waterfowl, waterfowl hunters, and fishing. Eliminating fishing and decreasing waterfowl on the Refuge will decrease tourism, which will devastate area merchants and ruin the economy in Sumner and the entire surrounding area.**

National wildlife refuges do affect local economies, perhaps most prominently by attracting visitors. Management direction included in the CCP is expected to increase overall Refuge visitation. Improving the quality of habitat for waterfowl and other migratory birds, introducing duck hunting, and focusing on other visitor services all are features of the CCP that we expect will draw more visitors to the Refuge, which has the potential to benefit area businesses.

**Consideration should be given to the correction of any silt problems in Silver Lake by first conducting a cost/benefit ratio study, which the Army Corps of Engineers has used so successfully in addressing problems arising in providing benefits for the public.**

The Army Corps of Engineers and the National Wildlife Refuge System of the U.S. Fish and Wildlife Service are guided by different Congressional mandates. National wildlife refuges are managed to fulfill the purposes of each Refuge as well as the mission of the National Wildlife Refuge System. We address refuge related issues through comprehensive conservation planning and step down management planning in a way that meets our mandates and adheres to Service policy. Siltation of Silver Lake is a process that is best dealt with at its source. The CCP includes direction to work with others to improve erosion control within the watershed.

**Decreasing cropland on the Refuge will cause wildlife to invade neighboring farmland, which will decrease income as well as affect property values.**

Conversion of cropland on the Refuge will be implemented over a 15 year period. This will allow sufficient time for the Service to evaluate wildlife use as cropland is converted. The Refuge will work closely with Missouri Department of Conservation and local landowners to manage depredation problems.

**Fishing at Silver Lake attracts many people from outside the area that contribute to the local economy.**

National wildlife refuges do affect local economies, perhaps most prominently by attracting visitors. Management direction included in the CCP is expected to increase overall Refuge visitation. Improving the quality of habitat for waterfowl and other migratory birds, introducing duck hunting, and focusing on other visitor services all are features of the CCP that we expect will draw more visitors to the Refuge, which has the potential to benefit area businesses.

**This refuge is the staple of our community and if it goes the way it is planned it will be the demise of us.**

**Your plan will have a severe impact economically to Missouri as many out of State hunters use this area-bringing in much needed State Revenue.**

National wildlife refuges do affect local economies, perhaps most prominently by attracting visitors. Management direction included in the CCP is expected to increase overall Refuge visitation. Improving the quality of habitat for waterfowl and other migratory birds, introducing duck hunting, and focusing on other visitor services all are features of the CCP that we expect will draw more visitors to the Refuge, which has the potential to benefit area businesses.

**Many properties in the area are more valuable due to their proximity to Refuge lands, and stand to suffer considerably.**

According to Banking on Nature, a study of how the presence of a national wildlife refuge impacts local economies, managing land to benefit wildlife has very positive impacts on people. We expect that changes at Swan Lake NWR, such as expanding hunting opportunities on the Refuge, will have positive effects for surrounding communities.

**Property values will decline, and tax basis for local County governments will be impacted from lower sales tax and property tax assessments.**

National wildlife refuges do affect local economies, perhaps most prominently by attracting visitors. Management direction included in the CCP is expected to increase overall Refuge visitation. Improving the quality of habitat for water-

fowl and other migratory birds, introducing duck hunting, and focusing on other visitor services all are features of the CCP that we expect will draw more visitors to the Refuge, which has the potential to benefit the local area.

**Changes in Refuge management threaten income opportunities such as farming on the Refuge and renting land to hunters.**

The Service is mandated by law and policy to make management decisions based on the benefits to wildlife and habitat, and the changes at Swan Lake NWR are consistent with that mandate. Reduced farming is not unique to Swan Lake NWR; the Service has been steadily reducing the amount of farming for the past several years and we expect to continue to farm less as we restore more land Region-wide. Changes to Refuge management may reduce opportunities in some ways and improve them in others. For example, private land owners may see greater opportunity for renting land to hunters as the Refuge begins the process of opening land to duck and small game hunting.

**Opening up public duck and small game hunting in Swan Lake NWR will also bring economic benefits to the local businesses as well, with hunters seeking motels, restaurants, food, fuel and miscellaneous hunting supplies.**

“Banking on Nature,” a study of the economic impacts national wildlife refuges have on the local economy, supports this thought.

**There is no benefit of native prairie grass for migrating waterfowl.**

If flooded, particularly during spring migration, wet meadows consisting of native prairie grass and other herbaceous wetland species can provide suitable habitat for migrating waterfowl. During spring migration, waterfowl are engaged in pairing and courtship behavior and flooded meadows can provide food resources and areas for courtship and pair bonding activities.

**There will undoubtedly be more cost in maintenance of upland prairie and wet meadow to control succession of woody cover and undesirable plant succession. My understanding is that the current arrangement doesn't cost USFWS any money.**

Any type of land management costs money. When making land management decisions we first and foremost make those decisions based upon the best biological science we have and look at the best options we have to fulfill Refuge purposes. From that point we do consider the feasibility of management actions based upon staffing and budget limitations. There may be situations

where staffing and budget limitations do limit what we are able to accomplish with regards to the whole realm of habitat management.

**Considering the highly altered extent of this system, we recommend the deck ground soils between Swan and Silver Lakes (old EPP crop ground) for restoration to wet mesic to mesic prairie instead of restoration to wet prairie/meadow.**

Upon completion of the hydrogeomorphic evaluation (HGM) we will have a better understating of what can be achieved and what might be difficult to achieve or impossible to achieve in certain locations. This information along with other biological information will be utilized in making decisions.

**We suggest the Service consider agriculture or other managed disturbances at appropriate spatial and temporal scales as management methods to emulate natural processes to achieve desired habitat conditions.**

Agriculture and other managed disturbances are important tools for moist soil management. We will continue to use these tools as appropriate to meet habitat objectives.

**Alternative 3 would encourage the spread of invasive species such as Reed canary grass, which is already occurring on the refuge in a significant fashion in unmanaged areas.**

Invasive species such as reed canary grass are a persistent problem on many national wildlife refuges including Swan Lake NWR. The CCP includes direction to treat known infestations of invasive species and monitor common invasive species pathways such as streams, waterways, roads, and trails to aid in early detection of invasive species introductions.

**The CCP needs to give more consideration to native species, such as promoting deer, turkey, rabbit and quail, and discouraging beaver, coyote, bobcat and mosquitoes.**

Promoting and discouraging native (non-migratory) species is generally within the jurisdiction of state conservation offices. The U.S. Fish and Wildlife Service is primarily responsible for migratory wildlife, interjurisdictional fish, and endangered and threatened species.

**The real goal of the Draft CCP is to cut costs at Swan Lake NWR.**

The goal of the CCP is to establish a management direction that improves Swan Lake NWR for wildlife and people and contributes to meeting the goals of the National Wildlife Refuge System. Some strategies called for in the CCP will increase the operational expense of the Refuge and will be contingent upon increased funding.

**Use volunteers to cut the costs of running all the current and future programs.**

Volunteers contribute a great ideas and enthusiasm, and the Service is very supportive of expanding opportunities for volunteers at Swan Lake NWR. The level of training required for many programs and the level of responsibility that go with them make it unrealistic, and even unfair, to expect volunteers to run them.

**Increase or at least do not decrease Refuge funding, and use funding to promote the Refuge's current management.**

Funding levels at the Refuge are determined annually based on congressional appropriations and regional priorities. Future Refuge funding will be used to implement the approved CCP.

**The Service needs to fund the biological and visitor services strategies outlined in the plan even though at the present time, needs such as the hiring of replacement personnel apparently cannot be funded. If staffing and maintenance cannot be funded, the Service should consider turning over management of the Refuge to the Missouri Department of Conservation.**

We always look for opportunities to partner with State and Local agencies to accomplish our mission and will do so in the future. Staffing on National Wildlife Refuges is significantly impacted by federal budgets and the Service does the best it can within those parameters to ensure that every refuge is adequately staffed.

**There has not been adequate funding for the Refuge in the past, and without funding all of the alternatives could be at risk.**

Implementation of the CCP is dependent upon future funding. If insufficient funding is available to implement all aspects of the preferred alternative, funding will be dedicated to the highest priority projects at the Refuge.

**Rather than waste the money spent on the Refuge for the last 73 years, it would be beneficial to operate it with higher staff levels. Why is it that the proposed staffing solution could not be implemented to improve the habitat that is already established?**

A number of things influence staffing levels at the Refuge including congressional appropriations and regional priorities. If regional funding increases, Refuge budgets and staffing are likely to increase.

**The maintenance and improvement of existing conservation areas is equally as crucial as the creation of new areas.**

We agree. The purpose of the comprehensive conservation planning process is to produce management direction for Swan Lake NWR, an existing conservation area.

**To help manage this put a user fee on the area for fishermen, hunters, and the other folks that use the area. Plus encourage volunteers to help manage these programs and activities.**

User fees are not included as part of the CCP. The CCP does include direction to continue developing the Friends group and to provide volunteer opportunities.

**We believe Alternative 2 should be implemented regarding Threatened and Endangered species including the bats that inhabit some of the bottomland hardwoods.**

Alternative 4 was selected as the CCP that will guide Refuge management for the succeeding 15 years.

**While we don't agree with the habitat objectives described in Alternative 3, we support other aspects of the alternative (Threatened and Endangered Species, Welcoming and Orienting visitors, Hunting, Interpretation, Friends and Volunteers, and Outreach).**

These elements of Alternative 3 were preserved in Alternative 4 of the Environmental Assessment, which serves as the foundation for the CCP.

**Some proposed changes in the objectives are favorable and some are not. Why do we have to accept any of the 3 alternatives as a whole instead of picking and choosing the best alternative for each objective?**

That is essentially what happened after the release of the Draft CCP in June 2010. Elements that drew the most criticism were changed or deleted from Alternative 4 and other elements were carried over from Alternative 3.

**U.S. Fish and Wildlife Service and the Missouri Dept. of Natural Resources need to work together to develop a master plan for the entire area. (Swan Lake, Fountain Grove & Pershing Park) These areas are so close together that a plan that does not look at the entire area as a whole could hardly be called comprehensive.**

The Swan Lake Refuge Manager is currently part of a working team for the Lower Grand River Conservation Opportunity Area (LGRCOA) which includes these three units. That group is what initiated and led to accomplishing the hydrogeomorphic evaluation (HGM). The results of the HGM will be utilized by the LGRCOA to help manage the area. The LGRCOA is also working on some preliminary strategic habitat planning to help facilitate partnership opportunities between units of the LGRCOA.

**We believe the HGM evaluation should be the basis, at least partially, for decisions concerning alternatives and which areas are suitable for conversion to specific native habitats. We are surprised and disturbed that the action to be implemented in the CCP is being proposed before the results of the study are available.**

The Draft CCP proposed a very broad direction for managing Swan Lake NWR. The HGM evaluation will be utilized as we develop a more detailed habitat management plan for the Refuge.

**We fear a half implemented plan, higher costs and almost triple the present budget – and if the habitat really suffers – abandonment without responsibility.**

Comprehensive conservation plans walk a line between being visionary and practical. We want to identify a higher level of achievement in a CCP, and we also want to identify how we can work toward a Refuge's vision assuming no increases and possibly decreases to current funding. The Swan Lake NWR CCP identifies staffing and projects that may or may not be funded, but it also establishes how the Refuge will manage habitat without additional funding. "Abandonment without responsibility" is an unlikely scenario for National Wildlife Refuge System lands.

**The whole plan is such a waste of money that could be put to much better use.**

Planning is essential to achieving habitat and wildlife goals on national wildlife refuges, and it gives everyone interested in a refuge – neighbors, communities, state and local government – an opportunity to know what's being planned and to weigh in on it. Beyond being a good idea, it's a law: with the National Wildlife Refuge System Improvement Act of 1997, Congress mandated that the Service develop a comprehensive conservation plan for all land within the Refuge System.

**Romantic ideas about easily being able to return to historic, all-native habitat should be examined critically and closely for likely success before upsetting the current successful balance of the habitat, or may we suggest trying to root out the present infestations of reeds canary grass first?**

Service policy directs refuges to maintain or restore habitat to historic conditions if doing so is feasible and does not conflict with refuge purposes. We believe it is possible to increase the amount of native habitat and continue to meet the purposes of the Refuge and mission of the National Wildlife Refuge System. Specific actions and arrangement of habitats will be included in a step down management plan which will be guided by results of a hydrogeomorphic study as well as additional monitoring data. Invasive species such as reed canary grass are a persistent problem on

many national wildlife refuges including Swan Lake NWR. The CCP includes direction to treat known infestations of invasive species and monitor common invasive species pathways such as streams, waterways, roads, and trails to aid in early detection of invasive species introductions.

**The draft CCP Summary is written to skew opinions toward the proposed changes - i.e. naming Alternative 3 the (Preferred Alternative) and naming Alternative 1 the (No Action Alternative)...The name (No Action Alternative) subliminally gives the impression of an apathetic and non-aggressive approach to management.**

An Environmental Assessment has very specific requirements per the National Environmental Policy Act (NEPA). These requirements include developing a range of alternatives for how land is used, and one of those alternatives is required to be the current activity and must be labeled "No Action." This is a NEPA term, it is not unique to the Swan Lake NWR and it is not used to suggest apathy. Comprehensive conservation plans are based on an alternative developed in the Environmental Assessment, and we have to have a preferred alternative before we can write a Draft CCP and release it for public review. In general, it seems less than straightforward to release an Environmental Assessment without clearly identifying a preferred alternative. As the Service demonstrated at Swan Lake NWR and in other plans, sometimes the preferred alternative is revised following public review and sometimes a new alternative becomes the preferred alternative.

**This plan needs serious alterations to hold to the original scope on which the SWAN LAKE REFUGE was originally built for being the enhancement of wetlands for waterfowl and primarily the CANADA goose.**

The purpose of Swan Lake NWR is to provide for the needs of migratory birds and other wildlife. This includes ducks and geese, but also many other species of migratory birds. Management direction in the CCP provides for the needs of a wide variety of migratory birds with an emphasis on waterfowl and shorebirds.

**I'm beginning to think that perhaps the Swan Lake mission is being changed without anyone actually saying that's what they're doing.**

The purpose of Swan Lake NWR continues to be to provide for the needs of migratory birds and other wildlife.

**We are totally against the whole plan. The reports on how things will go cannot be believed, just like the bear attacks in Yellowstone that are all covered up. This is just another case of our agencies making up their own laws instead of obeying what is already in place and I think the government should do something about it.**

The U.S. Fish and Wildlife Service does not make up its own laws, we follow the laws and policies established by Congress. See Appendix G for a list of laws, policies and executive orders that apply to planning. The CCP and step-down plans that address all aspects of Refuge management are public documents.

**It was hard to hear people at the open house at Swan Lake NWR in June, and some participants would have preferred a presentation rather than an open house.**

We are sorry that the meeting style didn't meet people's needs. The Service prefers open house style meetings because, typically, they allow for more one-on-one conversations. Between the number of people who attended and the acoustics, the open house style was less successful than it could have been.

**I am quite sure that the Missouri Conservation Department has weighed in on this matter, that your department has totally ignored their opinions. I find that insulting to our Conservation Department, it's agents and Missouri Citizens.**

The Missouri Department of Conservation has been involved throughout this process and offered comments on the Draft CCP.

**Can you help educate the people in our community about the positive impacts this could have for Swan Lake's wildlife?**

Over time, we expect the CCP to provide education by demonstrating how changes to habitat management can have positive impacts for wildlife. Refuge's education programs and events will contribute to greater education about the CCP and its impacts on wildlife.

**I am putting my comments in on these future plans, not that it will make a difference. Because your mind is all ready made up and you have all ready destroyed the best Canada goose Refuge in the MidWest.**

Public comment resulted in the Service creating a new alternative that eliminated Objective 2-3: Eastern Massasauga Rattlesnake, eliminated Objective 1-1: Streams and Water Bodies, and created a new objective for managing Silver Lake that addresses concerns raised during the comment period. A new preferred alternative was selected. Your comments made a difference.

**It is time for us to scrap this plan that was so clearly dreamed up in a committee of people sitting in a room out of touch with what Swan Lake is really about, and to use some common sense to come up with a plan to solve the problems of Swan Lake without devastating this refuge.**

The CCP was developed with the participation of Refuge staff, Refuge System managers who have supervised Swan Lake NWR managers for decades and know it well, and state conservation officials. Public comment also shaped the completed CCP.

**I hope you will consider the real life application of these changes and the affect it will have on local people and wildlife, the economy and the visitors to Swan lake Wildlife Refuge.**

According to Banking on Nature, a study of how the presence of a national wildlife refuge impacts local economies, managing land to benefit wildlife has very positive impacts on people. We expect that changes at Swan Lake NWR, such as expanding hunting opportunities on the Refuge, will have positive effects for surrounding communities.

**Why have a public comment period if the concern of the public is not going to be taken into consideration prior to adoption of the proposed Draft CCP**

Public comments were considered and acted on throughout the Swan Lake NWR planning process. The CCP began with an open house and a 30-day comment period to find out what issues and opportunities people believed should be addressed in the CCP. Another open house and 30-day comment period were scheduled when a Draft CCP was available for review. A third comment period was held to give people an opportunity to comment on the new preferred alternative that was developed in response to public comment on the Draft CCP.

**I know that this proposed plan is very limited in it's scope. It revolves around only one species, completely ignoring the entire ecosystem that is Swan Lake.**

The CCP touches on all aspects of Refuge management to varying degrees. It provides management direction to address issues identified by the public, the Service, and others in a way that fulfills the purposes of the Refuge and the mission of the National Wildlife Refuge System, and that also adheres to Service policies. The purpose of the Refuge is to provide for the needs of migratory birds and other wildlife which includes hundreds of species.

**If the Draft CCP is an opportunity for everyone who cares about Swan Lake and its future to review the proposed management direction and comment on it, why is management so intent on selecting an alternative that makes sense to them and no one else? It's opposed by most of the locals, the hunting clientel, and numerous congressional representatives.**

A variety of conservation organizations supported the management direction proposed in the Draft CCP. While some people disagreed with the Draft CCP based on benefits to wildlife, much of the opposition was based on something other than wildlife issues. The Service is mandated by law and policy to manage the National Wildlife Refuge System for the benefit of wildlife first over competing interests.

#### **Public Comments on Alternative 4**

**Retain the objective in Alternative 4 to introduce duck hunting and small-game hunting.**

The objective is included in the CCP.

**You also need to instruct the refuge manager to open the gates to south pool when freeze up occurs for the geese and ducks have open water. They have not been doing this and all the geese and ducks move to the Missouri river and don't come back till it warms up. Your lucky to have a few days of decent hunting in the last part of December and the whole month of January.**

The Refuge manages water as a habitat management technique. The Refuge does not and will not "artificially" attempt to maintain open water during inclement weather conditions in order to hold birds in the local area.

**Drawing down Silver Lake will eliminate fishing opportunities for people with disabilities; consider building a lake or pond that would be accessible.**

Providing access for people with disabilities is an important part of Refuge visitor services. Fishing opportunities and associated facilities will be addressed in a Visitor Services Plan.

**Another question is, when and if you draw down Silver lake will there be a special permit available to seine, hand fish etc. I believe this should be discussed before the draw down begins. It would be a shame for the fish to die, without the opportunity to get the fish.**

We allow the collection of rough fish, in accordance with Missouri State Regulations, on Refuge wetland units that are drawn down. State law prohibits seining or hand fishing for game fish.

**Finally, I continue to urge you to use the partner resources available...particularly Missouri Department of Conservation (MDC) and Ducks Unlimited (DU). I know that both have submitted constructive comments and are standing by to be helpful.**

The Service has and will continue to partner with MDC and Ducks Unlimited.

**Also thank you for attending the meeting on Sept. 17, 2010 in regard to the CCP. That proves to me you do care about this area and Silver Lake.**

Thanks for the feedback.

**It appears to me that all alternatives call for a draw down of Silver Lake.**

Alternative 1, the No Action alternative proposed to continue existing management direction and did not include a drawdown of Silver Lake.

**I am strongly opposed to changing Silver Lake into a wetlands program. If it has to be done, do it with Swan Lake itself.**

There will be no changes to Silver Lake management during the initial years of the planning period. Under current management water levels are manipulated on the Swan Lake impoundment. Management of Silver Lake will be addressed in a Habitat Management Plan that will be developed within the next 5-7 years.

**Increase the capacity of the Swan Lake water control structure to improve water management capacity for waterfowl habitat.**

This has been discussed and we are currently looking at options. A larger water control structure would enhance management capabilities of the Swan Lake Impoundment as well as decrease flood damage to existing infrastructure. We will look at future budget opportunities to do this and partnership opportunities with organizations such as Ducks Unlimited and the Friends of Swan Lake NWR.

**If the water level is dropped, the sprouting of willow trees will greatly reduce the water area and increase siltation on Silver lake. In addition you will have other invasive species that will have to be addressed.**

There will be no changes to Silver Lake management during the initial years of the planning period. Management of Silver Lake, including treatment of invasive species, will be addressed in a Habitat Management Plan that will be developed within the next 5-7 years.

**Continue to manage Silver Lake as source water for managing wetland units.**

There will be no changes to Silver Lake water management during the initial years of the planning period. The CCP includes an objective to increase the amount of native foods for waterfowl within the Silver Lake by managing water levels. We will continue to collect additional monitoring data and within 5-7 years of CCP approval develop a detailed habitat management plan for achieving this objective that draws on the monitoring data and the results of a hydrogeomorphic study of the watershed. The habitat management plan will identify source water storage and man-

agement actions which will be implemented incrementally and monitored. Increasing waterfowl foods within the Silver Lake basin will not be done at the expense of source water for wetland management across the Refuge.

**The recommended acreage of remaining crop ground should be guided by the results of the HGM.**

**Utilize farming to provide a low cost way to effectively manage as much suitable and feasible acreage as possible.**

Service policy directs refuges to maintain or restore habitat to historic conditions if doing so is feasible and does not conflict with refuge purposes. Farming is not an establishing purpose at Swan Lake NWR, and we cannot justify the existing acreage in row crops. However, the availability of native seed, staff, and funding limit the amount of cropland that can be restored to other habitats in any given year. Therefore, the change from cropland to other habitats will be gradual over a number of years. By year 15 of the plan, approximately 400 acres will still be in crops, as well as additional periodic cropping within moist soil units. Specific actions and arrangement of habitats will be included in a step down management plan which will be guided by results of a hydrogeomorphic (HGM) study as well as additional monitoring data.

**You also need to plant all 1,400 acres in row crops. Geese and ducks can live on grass and weeds early in the season but when it gets cold they need grain.**

The Refuge provides habitat for a diversity of ducks and geese (26 documented species; see Appendix C) which require high energy foods especially during migration and wintering. Crops, especially corn, do provide high energy food but it is available to only a few of the waterfowl species that occur on the Refuge (mostly mallards and geese). The CCP calls for converting about 1,000 acres of cropland to native habitats that include plants used as food by a diversity of waterfowl and many other migratory birds.

**Small game and waterfowl hunting is proposed in Alternative 4. Even though there is still goose hunting lets make sure we retain the small game and duck hunting for Swan Lake. If done right this could possibly rival the best waterfowl hunting that the state of Missouri has to offer. This would be a big economic boost to the entire Swan Lake Zone! We want duck hunting at Swan Lake!**

Regarding funding, the draft does not mention the possibility of adding partners and seeking a NAWCA grant to help pay for wetland restoration. This would seem to be prudent and it might be helpful to mention it in the final plan.

The CCP includes an objective to introduce duck hunting. We will further evaluate hunting opportunities available at Swan Lake as we develop a hunting plan and evaluate hunting through an Environmental Assessment. Specific habitat improvement projects will be identified in a habitat management plan. Once specific projects are identified we will seek suitable funding including North American Wetlands Conservation Act (NAWCA) grants.

**This refuge of 10,795 acres should have more key staff members.**

The CCP calls for increasing the amount of staff at the Refuge contingent on available funding.

**If you draw down the Silver lake without forming this small lake or pond Cindy and others that is handicapped will not have a place to fish. Cindy's daughter was at Sept. 17 meeting asking you about handicap fishing places. She feels she did not get a straight answer.**

We will ensure that public use opportunities are readily accessible to and usable by individuals with disabilities, unless it would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

**It seems that your strategy is to study, evaluate and delay till those in opposition to the plan to drawn down Silver Lake will tire or go away. Mr. Springer's closing remark was that after meeting with this group tonight, "I do not think that this is going happen."**

There is no effort to delay a decision until opposition tires or goes away. We have decided to collect more information to ensure that we make the best decision for wildlife resources and the public.

