



7862

STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

February 10, 2006

Mr. Don Hultman, Refuge Manager
Upper Mississippi River NW&FR
51 E. Fourth St., Room 101
Winona, MN 55987

Dear Mr. Hultman:

The following are the Iowa Department of Natural Resources (Department) comments on the *Upper Mississippi River National Wildlife and Fish Refuge Supplement to Draft Environmental Impact Statement and Comprehensive Conservation Plan, Alternative E: Modified Wildlife and Integrated Public Use*.

The Department commends the United States Fish and Wildlife Service (Service) for listening to public, agencies, and other groups comments to the draft Comprehensive Conservation Plan. The language in this Alternative has shown that the Service made substantive changes in attempt to satisfy resource managers and users while meeting the vision and goals for the Upper Mississippi River Wildlife and Fish Refuge.

Iowa Department of Natural Resources staff has read the documents and have these general and specific comments concerning Alternative E.

General Comments:

The Department has jurisdiction over fisheries, navigation, and licensing requirements within the border of Iowa. The Department is concerned about Alternative E language related to the Service's permitting of fishing tournaments, commercial fishing, commercial mussel harvesting and commercial turtle harvesting. These activities are currently being actively managed and coordinated among the Upper Mississippi River states. The Department cannot agree with imposing additional rules and regulations for management of natural resources in which the Department has jurisdiction. We agree with the terms "one stop shopping" and "dovetail with" as described in Alternative E and as a way for the Service to comply with federal requirements without threatening state jurisdiction or causing hardship to user groups. The Department looks forward to working with the Service on elements of the plan that address jurisdictional issues in efforts to reach solutions that benefit the resources and its users.

Several "step down plans" are identified in Alternative E. The Service is encouraged to develop these additional plans in a timely manner, hold public meetings, and establish joint comment periods. This course of action will avoid confusion by the public and reduce staff time in coordinating agency responses.

The Service should include references to the Comprehensive State Wildlife Plans recently completed by all the states along the Refuge. The plan formulated for Iowa contains scientifically based information on the status of fish and wildlife species within its borders. It was formed by experts from throughout the Midwest including numerous members of the U.S. Fish and Wildlife Service. The Upper Mississippi Refuge and its staff will be a major partner in implementing the ambitious goals of this plan.

There is several additional public use areas identified in Alternative E. The Department feels access areas are limited in the refuge. The Service is requested to develop public use areas that provide easy access and are also available for multiple recreational uses. For example, the hiking trail identified in the Pool 9 map known as Kain Switch does not have a parking lot identified with it. For canoe trails, hiking trails or other public use areas, the Service is requested to consider landings, parking lots and other infrastructure needs to enhance these areas. The Department also believes all canoe landings should be available during ice-over conditions for access by ATV's to ice fishing areas. Wherever possible the Department requests the Service to increase shoreline-angling access to provide for quality fishing opportunities. Department staff looks forward in assisting the Service in implementing its public use goals.

Specific Comments:

3.1 Wildlife and Habitat. Under strategies, the Service should add that Refuge budget shall include special funding for operation and maintenance of habitat projects.

4.1 General Hunting. The Department recommends the Service remove the No Hunting Zone in Pool 11 identified as Goetz Island No Hunting Zone.

4.2 Waterfowl Hunting Closed Areas. The Department believes that the third paragraph, on Page 22, which begins with, "*Finally, the policy on evaluating....*" should be removed from the document. This subject is already covered in objective **3.2.4 Guiding Principals for Management Program.**

4.10 Wildlife Observation and Photography. The Service is encouraged to consult the States on all planned Environmental Management Program (EMP), Habitat Rehabilitation and Enhancement Projects (HREP's) currently proposed to make sure that implementation of auto tour routes, canoe trails, hiking trails, and observation towers areas are compatible with restoration project objectives. A good Iowa example is the Turkey River HREP. The slough associated with this project is proposed to be dredged. At the mouth at the Turkey River, it is suggested that the auto tour route be located near the railroad tracks. The route should begin at the Turkey River and end at the slough; each end should feature a shoreline fishing area. A wildlife viewing platform should also be placed along the tour route. With these amenities in place all aspects of the EMP project could be showcased.

February 10, 2006
Page 3 of 3

5.2 Electric Motor Areas. The Department requests that the Electric Motor Area identified as Guttenberg Ponds Area be deleted from the Alternative E plan. This area is not normally accessible to motorboats but does provide backwater-fishing opportunities during high flow periods. Deleting this proposed action will not cause conflict between powered boaters and canoers, kayakers, and paddle boaters.

Thank you for the opportunity to comment on the Comprehensive Conservation Plan, Alternative E proposal.

Sincerely;

A handwritten signature in black ink, appearing to read 'Jeffrey R. Vonk', written in a cursive style.

Jeffrey R. Vonk, Director
Department of Natural Resources