

**Grays Harbor National Wildlife Refuge
and the
Black River Unit of Nisqually National Wildlife Refuge
Scoping Report CCP/EA
August 2011**

This scoping report summarizes the issues, concerns, and opportunities identified by the Service, its partners, and the public during the public scoping phase for the Comprehensive Conservation Plan and Environmental Assessment (CCP/EA) for Grays Harbor National Wildlife Refuge and Black River Unit of Nisqually National Wildlife Refuge. Early in the planning process, the Service developed a list of preliminary issues, concerns, and opportunities for the CCP. These planning issues were presented at public scoping meetings (open house) on May 18 and 19, 2011 as well as in a Planning Update 1 (newsletter) and in the Federal Register Notice. Information gathered through these and other sources of information is reflected in this public scoping report.

Public Outreach

The first Planning Update was published and distributed on May 6, 2011 to a mailing list of approximately 500 recipients. A press release was also sent to 25 media sources for distribution. In addition, the Planning Update was posted on the Refuge website and copies were available at the CCP open houses, along with a comment form. On June 8, 2011, the Notice of Intent to Prepare a Comprehensive Conservation Plan and associated NEPA document was published in the Federal Register.

The preliminary issues distributed with the Planning Update posed the following questions for Grays Harbor National Wildlife Refuge:

- **Habitat Management and Restoration.** *What actions are needed to sustain and restore priority species and habitats over the next 15 years? How is sedimentation impacting shorebird habitat quality? What will the effects of climate change and sea level rise have on Refuge habitats and species?*
- **Invasive Species Control.** *Invasive plant species degrade habitat quality for shorebirds, migratory birds, and many other fish and wildlife. Invasive animals may compete with native fish and wildlife for limited resources. How can we reduce the incidence and spread of invasive species?*
- **Visitor Services and Education Opportunities.** *Wildlife observation, interpretation, photography, and environmental education are provided at Grays Harbor NWR. How can we improve these services and programs? What visitor services facilities are needed or planned? What volunteer programs and partnerships can be developed or strengthened to improve outreach and education? Trespassing, vandalism, and other illegal activities take place at the Refuge. What can be done to reduce these activities and improve wildlife and habitat protection?*

The preliminary issues distributed with the Planning Update posed the following questions for the Black River Unit of the Nisqually National Wildlife Refuge:

- **Land and Water Protection.** *What actions are needed to sustain and restore priority species and habitats over the next 15 years? How can we help improve habitat protection and connectivity, and reduce habitat fragmentation? How can we improve water quality and quantity in the Black River system for fish and wildlife?*
- **Habitat Management and Restoration.** *Most habitats have been altered by human actions and are in need of management and restoration to increase value as fish and wildlife habitat. What actions will help provide important information on key species, habitat*

composition, and the management prescription needed for the Black River Unit? What will the effects of climate change and sea level rise have on Refuge habitats and species? How can we enhance Oregon spotted frog recovery?

Invasive Species Control. *Invasive plant species degrade habitat quality for migratory birds, fish, amphibians, and many other forms of fish and wildlife. Nonnative animals may compete with native fish and wildlife for limited resources. How can we reduce the incidence and spread of invasive species?*

- ***Visitor Services and Education Opportunities.*** *The Black River Unit has remained largely closed because of the fragmented nature of current Refuge land ownership. Trespassing, vandalism, and other illegal activities take place at the Refuge. How can we reduce these activities and improve wildlife habitat and protection? What wildlife dependent priority public uses should be considered at the Black River Unit?*

The Service held two CCP public open house meetings; May 18, 2011 in Aberdeen, Washington and May 19, 2011 in Littlerock, Washington. Press releases notifying the public of the open houses were sent to several daily newspapers (including The Daily World and The Olympian). In addition, The Daily World and The Olympian published articles regarding the planning meetings.

At each open house, the Refuge Project Leader gave a brief presentation and explained the CCP process; the Refuges purposes and current management; and preliminary management issues, concerns, and opportunities that had been identified early in the planning process for each Refuge. At the end of the presentation Refuge staff was stationed at tables to write down comments and questions on flipcharts regarding the Refuges and planning. They also answered questions from attendees and took written comments. A total of 44 private citizens and representatives from various organizations attended the open houses, providing comment on the issues and opportunities presented. Eight people attended the open house in Aberdeen and 36 people attended in Littlerock.

In addition to comments recorded by staff during the public open house meetings, a total of 18 responses were received from individuals or organizations in writing from May 6 through June 2011. Ten of these were comment forms returned by mail or fax, at the public meetings, or hand delivered to the Refuge. Five comments/letters were sent via email and three were letters received through the postal service.

Summary of Oral and Written Comments Received During Public Scoping

The Service planning team developed a list of preliminary issues for each Refuge and presented them to the public in the Planning Update 1 and at the public meetings. Additional public concerns, issues, and opportunities outside the preliminary issues are also described and addressed under issues.

Grays Harbor NWR

Preliminary Issue: Habitat Management and Restoration

What actions are needed to sustain and restore priority species and habitats over the next 15 years? How is sedimentation impacting shorebird habitat quality? What will the effects of climate change and sea level rise have on Refuge habitats and species?

Summary: Many comments were received regarding shorebird habitat, some comments were reflected as questions, and some comments were general wildlife questions. Many comments focused on sediment build-up on the mudflat including: how to deal with the sedimentation issues, managing the sedimentation issue with dredging to offset loss of shorebird habitat, what would happen to shorebird prey species if it were necessary to dredge the bay, and where would shorebirds go if the basin filled in with sediment? A commenter asked if sedimentation rates and sea level rise would keep pace with each other. A few commenters suggested identifying threats and working to minimize stressors impacting shorebirds, wildlife, their health, and habitat.

Concerns were raised regarding disturbance to shorebirds from aircraft using the Bowerman Airport, which is adjacent to the Refuge, and one commenter noted that removal of the berm in the eastern portion of the Refuge would not provide much habitat benefit due to the roads. One commenter said funding should be used for waterfowl habitat and not salmon or visitor access.

Some commenters suggested monitoring habitat changes and an organization suggested an inventory and monitoring program to assess shorebird habitat changes, vegetation changes, sedimentation, as well as doing a water resource assessment. One organization stressed working with other natural resource agencies and private landowners to develop habitat connectivity to other natural areas. Another comment was to protect low tide areas in other parts of the Grays Harbor estuary. Commenters also suggested protecting, monitoring, or evaluating specific shorebird habitat outside the Refuge boundary, such as around Ned's Point and areas west of Bowerman Basin. Another commenter suggested considering Refuge expansion in 15 years but not in this planning process.

A few commenters and one organization stated concerns regarding global climate change, its effects to Refuge resources and planning for sea levels to rise. A commenter asked if shorebird migration is being affected by climate change. Some commenters asked specific questions about wildlife such as osprey, bald eagles, and red knots.

Service Response: *Providing quality wildlife habitat will be a priority in the development of the CCP/EA, since this is both the purpose of the Refuge and part of the mission of the National Wildlife Refuge System. The Service will consider and evaluate threats and changes to all habitats on the Refuge in the development of the CCP/EA. Throughout the CCP process, the Service will assess what is currently known about global climate change, how it affects the species and ecosystems that depend on the Refuge, which issues can be further studied at the Refuge and ecosystem level, and how this information can be incorporated into management of the Refuge over the life of the plan and in some instances into the future.*

Preliminary Issue: Invasive Species Control

Invasive plant species degrade habitat quality for shorebirds, migratory birds, and many other fish and wildlife. Invasive animals may compete with native fish and wildlife for limited resources. How can we reduce the incidence and spread of invasive species?

Summary: A number of respondents stated support for control of invasive/exotic species. Invasive species of particular concern included knotweed and phragmites. Several respondents were supportive of the use of chemicals/herbicides and one expressed concern about the use of chemicals (off-Refuge) to control shrimp to benefit oyster growing.

Service Response: *The CCP/EA will address invasive species in detail. The control of invasive species has been and will continue to be a management issue for the Refuge. One of the key questions to be considered in developing Refuge management alternatives is which area and/or species will be prioritized for treatments and whether those treatments will involve eradication or suppression.*

Preliminary Issue: Public Use - Visitor Services and Education Opportunities

Wildlife observation, interpretation, photography, and environmental education are provided at Grays Harbor NWR. How can we improve these services and programs? What visitor facilities are needed or planned? What volunteer programs and partnerships can be developed or strengthened to improve outreach and education? Trespassing, vandalism, and other illegal activities take place at the Refuge. What can be done to reduce these activities and improve wildlife and habitat protection?

Summary: Commenters provided a wide variety of suggestions. Several commenters requested additional trails and/or bike paths on Refuge lands as well as along Paulson Road, Airport Way, and State Highway 109. Additional and improved signage was requested to locate the Sandpiper Trail, the Refuge itself, and to raise the profile of the Refuge in the City of Hoquiam. Additional suggestions included making the Port of Grays Harbor gate access area more inviting and to make the airport hangers inaccessible or secured from public access. Other comments included the enjoyment of walking on the boardwalk and the need to balance human wishes for trails and facilities with wildlife needs.

Environmental education or outreach suggestions included the need for information signs, trail information, and the need for on-site staff. Some commented about the need for more educational opportunities throughout the year such as guided walks and talks. Several commenters suggested the Refuge build a visitor/interpretive center and some suggested it be developed and shared with partners including the city and county or that it should be small. One commenter asked how realistic a visitor center is in this economic climate. Commenters encouraged partnerships and development of “champions” for the Refuge.

Service Response: *Providing appropriate and compatible wildlife-dependent recreational uses is part of the mission of the Refuge System and will be an important component in the development of the draft CCP/EA. Improvements or changes in interpretation, education, and other wildlife dependent visitor programs will be considered and included in the draft CCP. An analysis of the funding and staffing needed to implement each alternative will also be prepared as part of the draft CCP. The Service will examine current partnerships and new partnership opportunities and identify how this information can be incorporated into management of the Refuge. Partnerships and volunteer programs are essential to achieving the mission and goals of the National Wildlife Refuge System and Grays Harbor National Wildlife Refuge.*

Additional public issues, concerns and opportunities

Public Use Hunting and Fishing

Summary: A majority of hunting related comments suggested federal funds generated by hunters purchasing the ‘duck stamp’ allowed the creation of the Refuge and thus hunters should be given access to hunt. A commenter stated that people who provide the primary source of funds should have input on management. One commenter suggested hunting should be allowed to the fullest extent safety allows, one suggested hunting if it were safe, and another suggested only a portion of the Refuge should be open to hunting. Some commenters focused only on hunting waterfowl, while others suggested ‘all hunting’ and some requested fishing access. One request was for better hunting and fishing access for handicapped individuals. One commenter suggested including education in an attempt to bridge the gap of misunderstanding between hunters and non-hunters by explaining how hunting benefits wildlife populations and habitat conservation. A commenter stated the site should be an inviolate sanctuary.

Service Response: *The Refuge Improvement Act of 1997 identified six priority public uses that take priority over other kinds of public uses on National Wildlife Refuges, including hunting, fishing, wildlife observation and photography, and environmental education and interpretation. The CCP/EA will review all priority public use activities for appropriateness and compatibility. We recognize that any public use causes some degree of disturbance to wildlife. At the same time, providing wildlife-dependent public uses can increase public awareness of, and support for the mission of the Refuge System and help to fulfill Refuge goals and objectives. Disturbance to wildlife caused by public use will be considered when analyzing the environmental impacts of each alternative, as well as in compatibility determinations which will be updated as part of the final CCP. The area where public uses are allowed versus undisturbed sanctuary areas and timing of use will also be considered in developing refuge management alternatives. Visitor services alternatives will also consider quality of the experience, conflicts between users, and other criteria considered in Refuge visitor services programs. Retaining current public use facilities and use (no expansion of facilities or footprint of public use) will be considered as part of the “No Action” alternative. This will include an analysis of the effects of the alternatives on wildlife and the staffing and funding required to implement the alternatives.*

The lands that comprise Grays Harbor NWR were not acquired with funds from the sale of duck stamps. Acquisition funding was from the Land and Water Conservation Fund. It should be noted that nothing in the original Migratory Bird Conservation Act (MBCA) or subsequent amendments requires or mandates hunting on any lands purchased with “Duck Stamp” monies. The assertion that lands purchased under the authority of the MBCA are somehow required to be open to hunting or that hunting takes precedent because of the source of funds is inaccurate. The original intent of the MBCA was the lands purchased under the authority of the MBCA were to be managed as inviolate sanctuaries for migratory birds in which all hunting is prohibited. Amendments to this MBCA in 1949, 1958, and the Fish and Wildlife Improvement Act of 1978 modified the MBCA to permit hunting on lands purchased with “Duck Stamp” monies with provisions and if certain conditions were met.

Contaminants

Summary: Several commenters asked about potential sources of contaminants (sewage treatment ponds, former local landfill site, fill used for the airport) on and around the Refuge.

Service Response: *The Service has started a Contaminant Assessment Process (CAP) for Grays Harbor NWR which will summarize current knowledge on contaminant issues and identify information gaps. The CAP will be used in the development of the draft CCP/EA. The draft CCP/EA will include a summary of contaminant issues and objectives and strategies where feasible to address issues that are identified.*

Planning Process

Summary: A commenter suggested we complete an Environmental Impact Statement (EIS) instead of an Environmental Assessment (EA). An organization urged the Refuge to consider climate change in the CCP planning process.

Service Response: *The CCP planning process was designed to follow National Environmental Policy Act (NEPA) guidelines. This process has been designed to encourage and include public participation at various stages in the planning process. Part of the process of CCP development is determining if an Environmental Assessment or an Environmental Impact Statement is warranted. Climate change will be considered in the development of the draft CCP, based on current knowledge and within the scope of planning for the next 15 years.*

Black River Unit of Nisqually National Wildlife Refuge

Preliminary Issue: Land and Water Protection

What actions are needed to sustain and restore priority species and habitats over the next 15 years? How can we help improve habitat protection and connectivity, and reduce habitat fragmentation? How can we improve water quality and quantity in the Black River system for fish and wildlife?

Summary: A number of commenters shared concerns about the lack of protection of wildlife habitats in the unique and diverse Black River watershed and suggested expanding the current acquisition boundary of the Black River Unit to protect and enhance critical prairie and oak woodlands, grasslands, wetland, and forest habitat, and protect habitat for Chinook and chum salmon and the Oregon spotted frog. Several commenters were very specific in their descriptions of high quality lands/habitats they felt were in need of protection. They identified habitat linkages/wildlife corridors to the west connecting with the Capitol Forest and south or downstream to lands of the Confederated Tribes of the Chehalis or to the confluence of the Chehalis River. Specific encouragement to enlarge the Unit acquisition boundary to include prairie and oak woodlands was provided because of the political uncertainty of protection. Additionally the Satsop River was noted as being worthy of Refuge inclusion and conservation because it is one of the largest unprotected freshwater habitats along the Chehalis watershed and would complement the Black River Unit and Grays Harbor NWR. Additionally a request to expand the Refuge to include small tributaries and wetlands north of 88th Street to the east of the current boundary was made. Commenters were also interested in the land acquisition priorities within the current Black River Unit acquisition boundary and timeline. A few commenters suggested working with other natural resource agencies, landowners, and organizations to protect the network of habitats in need of conservation. One commenter suggested working with inholding landowners to increase the quality of their lands for wildlife if money for acquisition is not available. One commenter noted that the original authorized boundary had been increased and requested that the boundary be reduced to the original size.

Service Response: *Measures to protect and sustain priority habitats and species will be key components in developing the draft CCP.*

Regarding land protection and acquisition, it will continue to be a priority to acquire lands inside the existing approved acquisition boundary, if funding is available and there are willing sellers. The original authorized boundary has been increased to incorporate two important properties with key natural resources at the request of willing sellers. NEPA guidelines were followed in that limited expansion; reducing the current authorized boundary will not be included as part of the CCP. During the planning process, the Service will consider recommendations for boundary expansion and identify partnerships that could play a role in the protection and restoration of habitats outside the current Refuge boundary.

Preliminary Issue: Habitat Management and Restoration

Most habitats have been altered by human actions and are in need of management and restoration to increase value as fish and wildlife habitat. What actions will help provide important information on key species, habitat composition, and the management prescription needed for the Black River Unit? What will the effects of climate change and sea level rise have on Refuge habitats and species? How can we enhance Oregon spotted frog recovery?

Summary: A large number of commenters shared their interest and ideas in protecting, managing, and monitoring wildlife habitat and protecting species. Questions were raised about identifying Refuge habitats and the overall accuracy of the vegetation maps. Some commenters identified the current elk habitat and raised concerns about potential changes that would eliminate elk grazing thereby eliminating the opportunity to see elk.

Concern over the water quality and quantity in the Black River was expressed by many individuals and organizations. Many suggestions urged an evaluation of the river hydrology and water quality; withdrawal amounts from the river itself and from wells including small and exempt wells; impacts from sedimentation, pollution, chemicals, and discharges; the amount of fecal coliform from septic run-off; river flow restrictions; effects of channelization and old drainage ditch/canals, and potential threats.

Many commenters had an interest in improving the health and diversity of habitats and wildlife populations that depend on them, especially state and federal listed species such as Oregon spotted frogs and their habitat, expanding oak and prairie habitat, anadromous fish habitat, rare animals, plants and habitats, and managing grasslands. Some commenters suggested expanding the Refuge boundary to include more habitats while others suggested working within the current boundary to improve habitats and another suggested developing strategies to improve habitat connectivity. A few commenters and one organization stated concerns regarding global climate change, the effects to Refuge resources, and methods to alleviate stressors to habitats and wildlife populations. One commenter stated in light of climate change planning for the Black River Unit was a waste of time.

Service Response: *Providing quality wildlife habitat will be a priority in the development of the CCP/EA, since this is both the purpose of the Refuge and part of the mission of the National Wildlife Refuge System. The Service will consider and evaluate threats and changes to all habitats on the Refuge in the development of the CCP/EA. The Service will assess what is currently known about the river, its hydrology and water uses, wildlife habitats and wildlife populations including state and federal threatened and endangered species, and critical habitats on the Refuge. Survey and research needs and priorities will be considered in detail in the CCP/EA, focusing on key issues within the scope of the CCP. An analysis of the funding and staffing needed to implement alternatives will be prepared as part of the draft CCP.*

Preliminary Issues: Invasive Species Control

Invasive plant species degrade habitat quality for migratory birds, fish, amphibians, and many other forms of fish and wildlife. Nonnative animals may compete with native fish and wildlife for limited resources. How can we reduce the incidence and spread of invasive species? Possible actions include invasive plant monitoring and management to protect and restore native wetland and upland habitats.

Summary: Several respondents stated interest and support for control of invasive/exotic species and one organization offered to help. Invasive species of particular concern included; purple loosestrife, knotweed, scotch broom, Himalayan blackberries, reed canary-grass, New Zealand mud snails, and feral house cats. Respondents were supportive of the removal of invasive species and one commenter suggested the Refuge provide information to the local landowners about invasive species control methods. Another commenter requested that Scotch broom be removed from the south end of the Refuge. One commenter requested judicial use of any herbicides. Another noted river access is impeded by vegetation.

Service Response: *The CCP/EA will address invasive species in detail. The control of invasive species has been and will continue to be a management issue for the Refuge in order to achieve Refuge goals and objectives. One of the key questions considered in developing Refuge management alternatives is which area and/or species will be prioritized for monitoring and control and what level of effectiveness can be achieved. Survey and research needs will also be considered to address this issue.*

Preliminary Issue: Visitor Services and Education Opportunities

The Black River Unit has remained largely closed because of the fragmented nature of current Refuge land ownership. Trespassing, vandalism, and other illegal activities take place at the Refuge. How can we reduce these activities and improve wildlife habitat and protection? What wildlife dependent priority public uses should be considered at the Black River Unit?

Summary: Many commenters shared concerns related to the safety, security, and illegal activities on Refuge property on and around the current facilities including; barns, unoccupied houses, illegal dumping activities, and other illegal uses. Comments included wishes for derelict structures to be removed. One commenter asked if the old buildings are eligible for the National Register of historic places, and if so that they should be maintained; if not, they should be removed. Some voiced concerns about visitation increasing at the Refuge and future impacts to their property from trespass and illegal dumping. One commenter suggested that the Refuge be managed and owned by the State of Washington for better accountability.

Service Response: *The Service will consider these comments in developing alternatives and objectives to reduce trespass, vandalism, and other illegal activities on the Refuge. Several of the properties that have been acquired at the Black River Unit had old buildings or houses on them. Many of these have been removed as funding has become available and in compliance with cultural resource requirements, but several still*

remain. Efforts have been made to secure these buildings until they can be removed but vandalism and trespass continue to be issues. The draft CCP alternatives will consider measures to improve wildlife protection and reduce these problems and other illegal activities.

Suggested Visitor Facilities/Enhancements

Summary: A number of commenters shared ideas for public use opportunities and facilities. Some expressed a wish for minimal structures while others specifically asked for a visitor center and information kiosks. Some shared concerns about too much development, the impacts to wildlife, and keeping some areas secure for wildlife. One expressed their wish for minimal access and trails while several requested a variety of off road parking and viewing areas to make it safer to view wildlife, including elk. Some suggested the development of trails (barrier-free) and access to the 123rd and 110th Avenue areas. Barrier-free viewing blinds were requested. Commenters also suggested finding a balance in providing new wildlife viewing opportunities while minimizing disturbance to wildlife. One commenter suggested coordination with the Rails-To-Trails plans in Thurston County.

Service Response: *Visitor services alternatives will be included as part of the draft CCP, with a focus on wildlife dependent recreation, which are priority public uses for the national wildlife refuge system. We recognize that any public use causes some degree of disturbance to wildlife. At the same time, providing wildlife-dependent uses can increase public awareness of wildlife and nature and encourage support for the refuge system. Alternatives will include consideration of areas open for visitor activities and closed sanctuary areas for wildlife. Development of draft alternatives will consider the various comments provided, but must also take into consideration the combination of public and private ownership that remains within the authorized Refuge boundary. The CCP/EA will review all public use activities for appropriateness and compatibility. Visitor facility alternatives will also be evaluated and incorporated within the draft alternatives. An analysis of the funding and staffing needed to implement each alternative will be prepared as part of the Draft CCP.*

Suggested Visitor Facilities/Enhancements (Boats and River Access)

Summary: A number of commenters requested the Service consider providing river access with many comments regarding access at 110th Ave. Some commenters requested that the Service should work with DNR to either acquire the 110th Ave access, redevelop the old boat ramp there, or create access and parking through a recently acquired tract near 110th. Additionally a comment suggested improving river access, boat launching, and parking at 123rd Avenue. Another commenter said that any water access should include parking, signage, access, and sanitation facilities. A number of commenters requested planning for non-motorized boat access only while another suggested access for small motorized boats. Two commenters suggested that jet skis and powerboats impacted wildlife and habitat and/or should be prohibited and enforced. River mile markers or channel markers from 110th to the north end of the river where it meets Black Lake was suggested.

Service Response: *Water access and related wildlife dependent recreation will be considered in the development of the draft CCP. Draft alternatives will need to consider the various land ownerships existing on the Black River within the authorized Refuge boundary. All visitor activities and facilities will be evaluated for appropriateness and compatibility. An analysis of the funding and staffing needed to implement each alternative will also be prepared as part of the draft CCP.*

Education/Outreach

Summary: A number of commenters suggested ways to improve and share information about the Refuge. Some suggested posting more information on the web site, providing educational materials and programs, and interpretive signs. An organization suggested building understanding and support for wildlife conservation and the refuge system as well as developing environmental education to address vulnerabilities of Refuge resources to climate change. One comment was to implement a volunteer program for the Black River Unit. Also, one commenter suggested outreach to current landholders to learn invasive plant control methods that will increase quality wildlife habitat.

Service Response: *Environmental education, interpretation, and outreach activities will be considered in detail in the CCP/EA. The Service will also consider improved or new opportunities for partnerships and volunteers to enhance education, interpretation, and outreach on the Refuge. Alternatives will include an analysis of funding and staffing needed to implement the draft CCP.*

Hunting and Fishing

Summary: A number of commenters requested the Service consider hunting opportunities on the Black River Unit. Most hunting related comments linked financing of the refuge system or the Refuge through 'federal duck stamp purchases' and taxes and the belief that this funding source should result in hunting access. Some comments suggested the entire area be opened to the fullest extent safety allows, others requested specific areas be opened to hunting, and two suggested hunting if it were safe. One commenter specified that only a portion should be opened and another recognized the need for balance between non-hunter and hunter user groups. Some commenters focused only on hunting waterfowl, while others suggested 'all hunting'. Some requested fishing access and one comment was for better handicapped hunting and fishing access. One commenter suggested including education in an attempt to bridge the gap of misunderstanding between hunters and non-hunters by explaining how hunting benefits wildlife populations and habitat conservation. A commenter stated the Black River site should be an inviolate sanctuary and another noted hunting should be strictly curtailed or prohibited.

Service Response: *The Refuge Improvement Act of 1997 identified six priority public uses that take priority over other kinds of public uses on national wildlife refuges, including hunting, fishing, wildlife observation and photography, and environmental education and interpretation. The CCP/EA will review all priority public use activities for appropriateness and compatibility. We recognize that any public use causes some degree of disturbance to wildlife. At the same time, providing wildlife-dependent public uses can increase public awareness of, and support for the mission of the Refuge System and help to fulfill Refuge goals and objectives. Disturbance to wildlife caused by public use will be considered when analyzing the environmental impacts of each alternative, as well as in compatibility determinations which will be updated as part of the final CCP. The areas where public uses are allowed versus undisturbed sanctuary areas and timing of use will also be considered in developing refuge management alternatives. Visitor service alternatives will also consider quality of the experience, conflicts between users, and other criteria considered in Refuge visitor services programs. An analysis of staffing and funding required to implement the alternatives will also be included in the draft CCP.*

The Service acknowledges the long history that waterfowl hunters have played in supporting wetland protection through the purchase of duck stamps. In the case of the Black River Unit, a single parcel was acquired with migratory bird funds, but the great majority of lands that have been acquired there were acquired with funding from the Land and Water Conservation Fund and not through duck stamp sales. It should be noted that nothing in the original MBCA or subsequent amendments requires or mandates hunting on any lands purchased with "Duck Stamp" monies. The assertion that lands purchased under the authority of the MBCA are somehow required to be open to hunting or that hunting takes precedent because of the source of funds is inaccurate. The original intent of the MBCA was the lands purchased under the authority of the MBCA were to be managed as inviolate sanctuaries for migratory birds in which all hunting is prohibited. Amendments to this MBCA in 1949, 1958, and the Fish and Wildlife Improvement Act of 1978 modified the MBCA to permit hunting on lands purchased with "Duck Stamp" monies with provisions and if certain conditions were met.

Conservation Partnerships

Summary: A number of commenters suggested the Refuge develop a coordinated approach with other groups and agencies including Washington Department of Fish and Wildlife, United States Coast Guard, Washington Department of Natural Resources, Washington Department of Ecology, Soil Conservation Service, Thurston County, Fish and Wildlife Service Ecological Services, law enforcement agencies, Capitol Land Trust, and The Nature Conservancy in planning and management for the protection, restoration, and interpretation of lands and waters within the Black River corridor.

Service Response: *Partnerships are essential to achieving the mission and goals of the National Wildlife Refuge System and this Refuge. Partnerships are an important part of current management of the Black River Unit. Increased or improved partnerships will be considered and discussed in detail in the draft CCP/EA.*

Planning/Other

Summary: A variety of comments and concerns regarding planning included: providing information access on the web, requesting an explanation of why public uses are closed, making planning documents more user friendly, and including state agencies, USFWS Ecological Services, The Nature Conservancy, Thurston County, and others in planning. One commenter felt an Environmental Impact Statement (EIS) should be prepared over an Environmental Assessment (EA). Another respondent suggested the Refuge should be managed and owned by the State of Washington for better accountability. One commenter thought planning was a waste of time considering the threat of climate change.

Service Response: *The CCP planning process was designed to follow National Environmental Policy Act (NEPA) guidelines. This process has been designed to encourage and include public participation at various stages in the planning process. Part of the process of CCP development is determining if an Environmental Assessment or and Environmental Impact Statement is warranted. Refuges are considered closed to all public use until formally opened, which includes a detailed evaluation of appropriateness and compatibility. The draft CCP will include a thorough evaluation of proposed public uses and the rationale for each which will be available for public review and comment. The Service formally invites other land management agencies and Tribes to participate early-on and throughout the planning process. Staffs from state agencies (WDFW and DNR) are participating members of the extended planning team as well as staff from the Ecological Services division of the USFWS. The Service will provide current planning updates and documents on the Refuges website throughout the planning process.*

Outside the Scope of the Plan

Summary: One comment received said that the Nisqually River should be considered for boat access for Nisqually flats hunting at all times during bad weather. Another respondent focused on Willapa NWR and how it should be managed.

Service Response: *These topics are outside the scope of this CCP/EA which covers only the Black River Unit of the Nisqually NWR and Grays Harbor NWR.*