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FINAL CCP Scoping Summary Report – Klamath Basin NWRC

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BACKGROUND: We began the scoping process for the Klamath Basin National Wildlife Refuge Complex Comprehensive Conservation Plan (CCP) in spring 2010. Briefing materials and requests for input were posted to the website, circulated via newspapers and radio programs, and mailed to known interested parties. The Federal Register Notice of Intent to Prepare a Comprehensive Conservation Plan and Environmental Impact Statement was published on April 29, 2010. The scoping comment period ended on June 28, 2010. Public scoping meetings were held in Tulelake, CA (May 10, 2010), Medford, OR (May 11, 2010), Redding, CA (May 12, 2010), and Klamath Falls, OR (May 13, 2010). Approximately 72 people attended the four meetings, and written comments were recorded. Additional comments were received via letters, emails, and comment cards.

The following summary includes comments from individuals, organizations, elected officials, and other public agencies concerning issues to be considered throughout the development of the Draft CCP for the Klamath Basin National Wildlife Refuge Complex.

AGRICULTURE:

General agriculture: We received many comments related to agricultural practices. Several people asked us to continue existing farming and ranching on the refuges, and continue cooperative relationships with the local agricultural community. Several people suggested agriculture, wildlife habitat, and the economy are compatible and that repeated studies show agriculture enhances uses of the refuge by many waterfowl species. One specifically stated that agriculture, farming, and grazing is needed on the leaselands because according to the California Waterfowl Association, crops supply more than 50% of feed for the Pacific Flyway. Others encouraged us to determine agriculture is incompatible on national wildlife refuges. Some asked us to include a description of agriculture practices in the Klamath Basin, give a history of how agriculture has been displaced, and help the public understand that private lands also offer wildlife benefit. Some suggest that we continue to implement programs such as Walking Wetlands, fall flooding, flood fallow, and native grass burn practices, because they provide refuge habitat improvement at no cost to the Service. Some asked us to implement a voluntary buyout program for agribusiness leases. Others asked us to manage agriculture according to Best Management Practices. One suggested that we expand partnerships to research and develop methods for making agricultural practices more compatible with wildlife. One suggested that we continue to cooperate with the University of California Extension to maintain and enhance refuge farming (i.e. land rotation, walking wetlands, crop rotations, integrate wildlife

conservation). One suggested that we post notification of field flooding on the Oregon Straits unit before flooding. One suggested that we seek more coop farming on LKNWR and TLNWR to provide more food for waterfowl, while also allowing farming on the refuges.

Chemicals: Many respondents called for totally prohibiting the use of chemicals including pesticides and fertilizers, and one encouraged us to continue working within our community to education about the concern of pesticide use. Some argue that non-organic farming should cease, and organic and coop farming should increase. Others called for reducing the use of chemicals and using other methods such as, crop rotation, underseeding, clover and other legume for green manure, flooding, biocontrols, walking wetlands. Another suggested that we establish fertilizer management plans to ensure we meet water quality targets and suggested we monitor chemical use and take action on to address water quality impairment. Another cited a need for baseline data and the need to continue to evaluate pesticide effects on wildlife and monitor pesticide residue in leaselands and in runoff on water in later flows.

Commercial farming, general:
Many requested that we assess the commercial farming program, that we consider the number of leased acres, types of agricultural practices (i.e. pesticide application, tilling, etc.), timing and intensity of farming, water requirements, and the influence of these factors on the Service's ability to effectively manage waterfowl and carry out refuge purposes; and evaluate whether commercial farming is consistent with the Kuchel Act and compatible with the National Wildlife Refuge System. Several asked us to identify effects that commercial farming has on fish, wildlife, plants; and address how the lease lands might best be managed to enhance benefits to waterfowl, shore birds, and other water birds. If it is determined that agriculture is determined to be incompatible with waterfowl management, many called for limiting or terminating commercial farming citing that row crops do not provide quality wildlife benefit; agricultural practices harm wildlife; commercial farming uses scarce water at the expense of wetlands, fish, wildlife; commercial farming program uses critical land that could be used to store up to 100,000 acft of winter water. Others suggested curtailing commercial farming in years when the refuges don't received full water, by delivering water to wetlands rather than 22,000 acres of commercial farming. One suggested that when water is available that it would be beneficial wildlife if the lease lands were shallowly flooded following harvest.

Others pledged support for the lease land program, as a "win win" for Klamath agriculture producers, Klamath Basin economy, and refuge management, citing that lease land payments in lieu of taxes was as much as $209,000 annually. The leaselands were cited as a model for foundations who invest in farmland with wildlife and agriculture fully integrated. Several, urged us to uphold agriculture on the refuge, as required by the Kuchel Act.

Interpretation of the Kuchel Act was the topic of several comments. Several reminded that agriculture is a refuge purpose, per the Kuchel Act. Someone suggested that Kuchel Act/crops bring water to the refuge. One emphasized highest, best use, primary use of refuge for wild beast and birds and other uses consistent therewith. Another suggested that agriculture is second only to proper waterfowl management.

Several suggested moving the lease land program administration from the U.S. Bureau of Reclamation to Service.

Commercial farming, crops:
Several asked that we minimize crops of minimal habitat value. Row crops, especially, were cited as minimal wildlife use, more water intensive, and require pesticides and fertilizers. Some claimed that alfalfa is a hazard to nesting waterfowl and that leases are too long; and recommended that alfalfa be kept to a minimum and located only where it is needed to improve soil conditions. Another questioned whether alfalfa is a waterfowl crop when it seems like it can kill duck nests and eggs. We were asked to review crop rotation for feed quality and water usage. One suggested that a balance between cereal grains and marsh on Tule Lake and Lower Klamath NWRs is needed. Another suggested it would be nice to explore other crops like peas or wild rice and assess waterfowl use of these crops compared with traditional grains and grass pasture. Several others suggested that grass habitat strips be left around all field edges. One suggested that we enhance forage to reduce goose depredation on private lands. One suggested that if it was possible to increase sustainable crop yields on these lands, some of the land could be permanently returned to wetland management. One questioned if under the Kuchel Act, waterfowl is the focus, why are any crops planted that aren't known to benefit waterfowl directly, crops like sugar beets and onions shouldn't be allowed in the leaselands.

Commercial farming, Walking Wetlands:
The Walking Wetlands program received many comments. Many urged us to fully analyze all aspects of the Walking Wetlands program including the effects on long-term biologically integrity, diversity, and environmental health; how birds use walking wetlands and respond to management changes and crop selection; how various wetland types (i.e. seasonal, semi-permanent) and durations (2 years vs 3 years) affect soil productivity, pest control, foraging/nesting for key bird species; agronomic costs and benefits, infrastructure costs and maintenance; and effects to water quality. Some suggest that we should address how Best Management Practices could be identified and implemented to maximize sustainable crop yield while increasing benefits to wildlife.

Some applaud the program and asked us strive to identify new programs or funding mechanisms as incentive for farmers to expand Walking Wetlands on additional acreage off/on the refuges. Some who support Walking Wetlands suggested they remain on refuge property only, not on private property. Some call for increasing funding for dikes and water control structures to increase the Walking Wetlands program. Some prefer that Walking Wetlands in the conversion of marsh hunt area in Lower Klamath NWR be for no more than 2 growing seasons in grain, as is it delays hunt value for 6-8 years; shortening the grain cycle may return hunt value in 2-3 years. One suggested that a component of Walking Wetlands be committed to water quality treatment. Another suggested that Sump1A be part of Walking Wetlands by flooding part of the SW sump.

Others suggest that the Walking Wetlands program has demonstrated the enormous benefit of eliminating commercial farming, so the Service should consider the Walking Wetlands program as an interim measure while phasing out commercial farming and restoring permanent wetlands instead. Some urged that Walking Wetlands not be used as justification to maintain commercial

agriculture on the refuges. Some requested that we analyze how water availability from KBRA will affect Walking Wetlands; some ask that we disclose if there will be reduction of water delivery to Lower Klamath NWR due to Walking Wetlands and others urge us not to create reason to reduce water to Lower Klamath NWR.

Grazing:
We received many comments about grazing. Several people asked that grazing continue, others asked that grazing be eliminated. Several suggested that grazing is effective range management to reduce invasive species and fuel loading, and maintain wildlife habitat. Some highlighted success stories with local grazing permittees and agencies working collaboratively to restore sage steppe and remove junipers and hoped that the Service would continue to work closely with these partners. Others suggested that grazing introduces non-native vegetation. Some suggest that grazing is consistent with the Kuchel Act, and compatible with wildlife habitat (i.e. sage grouse, antelope, and deer.)

Lava Beds National Monument (LABE) raised some concern about Tulelake NWR leaseholders subleasing livestock grazing due to numerous issues with trespass onto (LABE) which is made worse when grazers walk livestock to/fro rather than drive them. They would prefer prohibiting subleasing on Tule Lake NWR, or if continued, greatly increasing subleasing regulations.

FIRE:
We received a few comments about the use of prescribed fire. Some asked us to consider implementing a test program for developing alternatives to agricultural field burning as a means to control weeds and pests. Some suggested that we reduce field burning frequency and acres. Other suggested that we continue to use fire as a management tool, in general, and to improve upland habitat and reduce the need for hay-growing. Some suggested that our fire program personnel need to be better informed in wildlife biology. Others asked to consider minimizing burning and consider timing (i.e. burning only after nesting season) and to ensure that burning doesn't extend beyond the road shoulder. We were asked to update the 2001 fire management plan conserving wildlife habitat as highest priority. We were asked to identify existing and proposed fuel breaks, use of prescribed fire, mowing, other vegetation treatments, and fire use in wilderness and managed areas. We were asked to describe the natural and historic role of fire and other occurrences that affect ecological processes.

HABITAT:
General Habitat:
We were asked to identify the distribution, migratory patterns, and abundance, of birds, fish, wildlife, plants, and habitat. We were asked to ensure protection of biodiversity, to protect and preserve the refuges, and to manage for conservation, stewardship, and restoration of birds, fish, wildlife, and Oregon native species. We were asked to manage for the primary purpose of conservation of migratory birds and native wildlife. We were asked to stay focused on the best interest of waterfowl.

We were encouraged to conduct a landscape scale analysis to create a diversity of habitats (i.e. more shallow water and mudflat habitat during key migration periods as well as nesting and reducing disturbance on colonial and non-colonial water birds). Several asked to manage the

KBNWRC for maximum habitat benefit for a full diversity of birds including, all native birds and raptors, not just waterfowl. Specific types of habitat suggestions include: areas for migrating shorebirds, perches for raptors, shallow water favoring species (i.e. White Lake shouldn't be drained until mid-July under these species can raise families first), tricolored blackbirds (i.e. Service should ensure that burning doesn't disrupt habitat), yellowheaded blackbirds, killdeer (i.e. leave some areas along tour route for nesting), swallows (i.e. maintaining mud locations, constructing suitable perches, excavating areas for nesting holes), expand and enhance riparian habitat for song birds, and support should be given to any new bird species who begin nesting on KBNWRC. Others asked us to analyze the full range of alternatives on the Pacific Flyway birds, other wildlife, etc.

We received many comments about restoring the historic lakebed, marshes, and wetlands. Several asked us to address the frequent draining of wetlands. Several suggested that we increase and enhance wetlands and riparian areas; one specifically suggested that we restore shallow wetland and marsh acreage to 50% of pre-settlement levels. One suggested that we convert seasonal wetlands to permanent wetlands, create treatment wetlands, and enhance wetland function or expand wetland acreage to reduce nutrient and organic matter concentrations. Many suggested that the restoration of normative function of Lower Klamath Lake benefitting the Klamath River and Pacific Flyway should be fully considered and assessed. One specifically suggested that the wetlands on the south edge of Tule Lake should be restored, especially, the bay just north of Captain Jacks Stronghold east of Hovey Point, the bay northeast of Canby's Cross, and the larger area extending from Canby's Cross north and west to Hovey Point Access Road.

We received a few comments related specifically to the Oregon Straits: the Oregon Straits unit should be included in the refuge system (rather than managed by USBOR) to better manage water, add coop farming and walking wetlands; and increase habitat diversity on the Oregon Straits unit.

Several suggested that we establish continual juniper removal and prescribed fire programs to improve upland habitat. Some suggest changing farmland into grassland which could be left standing for bird habitat including wild pheasant. Others suggested that habitat not be converted to farmland and habitat should be restored. We were advised not to let farming override the interests of native wildlife.

Some suggested that we should evaluate/assess opportunities for restoring migratory bird habitat and improving water quality on refuges and on adjacent private lands.

We were encouraged to identify areas of research that could fill most important information gaps needed to optimize the management of refuge resources (i.e. waterfowl habitat has been modeled, but comparable modeling for shorebirds and other nongame birds is needed.)

One suggested that we consider designated some areas as wilderness.

Upper Klamath NWR habitat - Some suggested that the CCP address how KBNWRC can be managed for migratory birds that move freely between UKL, and how the Service can influence

best management practices to address adequate lake levels, sedimentation, euthrophication, water quality, within refuges and within the larger context of Upper Klamath Lake.

Lower Klamath NWR habitat – General comments related to LKNWR included that the CCP address: how management can increase opportunities for colonial, non-colonial, and shorebirds by enhancing nesting substrate and manipulating water levels; the long term management of floating island and how to discourage nesting gulls while encouraging Caspian terns or other colonial water birds; evaluate flooding a substantial portion of LKNWR as a single large lake to mimic historic conditions from a phased and all-at-once implementation strategy to determine if this would be justified by substantially improved conditions for wetland birds.

One suggested that Service should take water available from Tulelake Irrigation District (TID) beginning September 1 each year to begin flooding LKNWR. Additionally, the Service should seek the removal of water restrictions on the Orem's unit. Some specific habitat suggestions include: keeping unit 3 as permanent marsh instead of unit 12c to reduce botulism kills, units 2 and 3 should be permanent marsh; other permanent marsh recommendations include 4b, 4c, 7a, 9a, and rotating 7b and 11b as permanent every 3 years; start flooding White Lake unit in late August with well water (pintails arrive in early September and need White Lake flooded when they arrive); leave standing grain in units that have been farmed in Oregon Straits unit.

Tule Lake NWR habitat – We were asked to assess opportunities in Clear Lake, Tule Lake, and Upper Klamath Lake, to enhance/sustain populations of 2 endangered suckers in all seasons and in all years; evaluate alternatives of enhancing populations of endangered fish and migratory bird habitat in Tule Lake; examine water management and circulation through wetlands and deep water refugia at Tule Lake to promote habitat for endangered suckers; address how the artificial island will be managed if it attracts large numbers of gulls which may prey on other species which prey on endangered fish; leave standing grain in all units that have been farmed.

Several suggested a need to identify how the Tule Lake sumps can be managed to meet sometimes conflicting needs of various bird groups, and increase and maintain higher waterfowl numbers and other birds species. One suggested that the Service work with TID to use water in Sump1B in early spring. One suggested that Sump 1A be managed as a seasonal marsh every few years to provide more productive marsh for migratory birds.

Bear Valley NWR habitat – We were asked to evaluate forest health issues and consider natural disturbance processes, such as fuel loading and overstocked tree densities, which potentially put bald eagle habitat at risk for catastrophic fire. A local neighbor greatly appreciates the function of BVNWR.

Clear Lake NWR habitat – We received several comments offering strong support for cooperative sage grouse restoration.

WATER:

Water, general:
We received many comments related to the water supply needs of the KBNWR. We were encouraged by many to manage the refuges with a more natural hydrologic regime. Many people advised that we explore means of securing water, one suggested that LKNWR alone needs at least 90,000 acft annually. Specific suggestions for securing additional water include: work to get higher priority in the water rights list; the Service and Secretary of Interior should consider acquiring all contracts, licenses, or easements needed for water delivery for the refuges and to improve the system to adequately serve refuge water needs; the Secretary of Interior should considering purchasing water rights for refuge to provide adequate and secure water supplies to these public lands; explore other methods of securing water, including purchasing water; winter and spring water could be stored on former lake beds which are currently used for commercial farming and used instead for fish, wildlife, and refuge purposes; transfer 1905 water rights associated with leaselands to refuge purposes; defend claim in Oregon Klamath Water Rights Adjudication for full amount needed by refuges, develop a plan to regulate junior water users; seek, improve, and increase all groundwater opportunities (i.e. sumps, drill more wells to support water on refuges); pursue all methods to remove irrigation ditches and diversion ditches and secure water rights needed to protect habitat; assess the potential to attain water from willing sellers, if there is potential, and the Service should develop a plan and implement the purchase of water from willing sellers. One questioned where water would come from, when it seems that salmon get 1st, 2nd, and 3rd choice on water, but ducks need water too.

Other water-related comments include: analyze current water conveyance and storage infrastructure to evaluate whether improvements and upgrades could increase efficiency; scarce water should not be used for commercial farming unless wetlands are receiving their full allocation; if KBRA is legislated use the 20% of lease land revenue to well installation and pump costs only; provide as much water as possible to refuges and wet as many units as possible; aggressively pursuing water for the refuge would improve hunting experience; put money generated from leaselands in special account for water only to develop new wells and other water sources.

We were asked to integrate drought management to include a sustainable groundwater component on TLNWR to maintain refuge purposes when water supply from Upper Klamath Lake is greatly restricted.

Last, we were encouraged to analyze the full range of alternatives on flows in the Klamath River – including impacts to listed species and options to assist with recovery of ESA coho and other tribal trust resources; and prioritize water for ESA, state-listed, and restored native fishes.

Water, Klamath Basin Restoration Agreement (KBRA):
We received several comments related to the KBRA. Some reminded that Klamath Basin water users and Service cooperatively negotiated in KBRA to provide consistent water for agriculture and refuges and that we should be aware of the KBRA. One advised that CCP alternatives should specially describe the KBRA and what the Service needs to do to be prepared to fulfill the intent of KBRA. Another suggested that the alternatives describe an affirmative and negative

Secretarial Determination. Alternatively, one suggested that the alternatives that seek much needed and aggressive improvements to the KBNWR move forward unhindered by the KBRA and that without legislative approval and appropriations, the KBRA should not play a role in dictating the future of refuge management.

We were asked to describe how water will be most efficiently managed for wildlife benefit during the interim until KBRA is implemented and evaluate how water management will change under full KBRA allocations and which wetland birds will benefit at which seasons (i.e. will there be the more summer water for nesting birds when evaporation rates reach annual highs?). Others cautioned us against relying on the KBRA to solve water needs and not to reduce water deliveries to LKNWR on account of walking wetlands.

Water Quality:
We received several comments related to water quality. We were encouraged to analyze the full range of alternatives on water quality on the refuge, Klamath Straits, and Keno Reservoir. We were reminded that the Service is designated as a management agency responsible for implementing the TMDL plan. General comments related to water quality included: prioritizing water quality improvement; analyzing increased removal efficiency of nutrient and organic matter from existing wetlands; monitoring for compliance with TMDL allocations; monitoring for water quality standards; improving timing of water releases to benefit water quality; developing a comprehensive water quality management and monitoring plan for Oregon and California; documenting how TLNWR and LKNWR are managed (i.e. water temps, depths, etc.); determining how LKNWR could be used for water quality treatment and how water delivery and drainage could optimize wetland function; determining the ability to modify wetland structure or water flow to advance water quality; documenting the influence of irrigated agriculture on water quality; analyzing ways to use existing and future wetlands to provide habitat and improve water quality to achieve TMDL load allocations; and managing wetlands to recycle water and nutrients.

VISITOR SERVICES:
Visitor Services, general: We received many suggestions for improving our visitor services. Specific suggestions include: adding more informative displays in the visitor center (maybe a wildlife museum could be build in place of the current lawn); LKNWR should be a showcase in how to manage wildlife viewing (visitors should never see the area of the tour route without water); open more of the refuge to the general public; establish Saturday morning docent type tours and talks at Discovery Marsh; fix canoe trail signs at UKNWR; revise existing funding and staff to improve bird habitat, bird biological monitoring, better environmental education, better photography, better public information and better bird access opportunities; increase volunteerism and offer the public a chance to contribute to work of managing refuge for wildlife; improve observation platforms and photo blinds in sanctuary units; improve maps and signs; better utilize fire personnel to help with maintenance; place fire personnel under direct supervision of refuge manager; prioritize wildlife compatible recreation uses over non-conservation uses; open additional canoe trails in hunt and non-hunt areas in UKNWR; recruit

adult volunteers to help improve all programs (local and residential volunteers); retrofit exterior lighting on refuge buildings to reduce nighttime light pollution; significantly upgrade the visitor center and refuge HQ (model after the Park Service for making a ranger station look good); improve routine maintenance; allow more the public more access to public land.

Visitor Services, general hunting:
We received many mixed comments related to hunting. Some suggested that hunting should not be allowed on the KBNWRC. Many suggested that hunting uses remain unchanged. Several commented on not wanting a drawing system to limit hunting opportunities. Other general hunting-related comments include: recommend full refuge draw for opening weekend on LKNWR and TLNWR every year; funding raised from hunting should remain for hunting only; allow hunting on the lower refuges; better enforcement of rules and regulations will reduce poor hunting sportsmanship; current space blind and "free roam" fields offer choice opportunities, all hunt field "drive-ins" allow for better usage; prefer free-roam with little restriction of the hunt area; increase quote from 10 to 12-15 on Sump1B; there is no need for "motorless" units; provide more motorless opportunities (i.e. have alternating units as walkin only on Sheepy East, or on Orhms, alternate motor/motorless each year); do not add new blinds on LKNWR; TLNWR and LKNWR would be good areas for limited draw archery and/or muzzleloader deer hunts; hunters pay $25 and federal duck stamp, birders pay nothing – do not separate birding and hunting areas; expand hunting opportunities in BVNWR; open BVNWR to walk-in cougar, bear, and bobcat hunting, which would lead to better feeding opportunities for raptors; open the hunt area to dove hunting during the regular California dove season; if lead shot is used, it should stop; keep Sump1and Fryes as a quality hunt with daily draws; make hunting season passes more readily available online; assess funds generated by hunters versus other uses and allocate accordingly if this isn't already being done; the waterfowl hunt program on Oregon Straits should be reviewed; the Service should evaluate if are there opportunities for improved hunting on the Oregon Straits unit.

We were asked why sanctuary exceeds 60% of the refuge, why is the hunting area reduced to allow non-hunting use to be segregated from hunting, especially when non-hunters already have 100% access to the refuge every day of the year.

Visitor Services, hunting guides:
The use of guided hunting was controversial. Several respondents suggested that professional hunting guides should be reevaluated or eliminated. Others suggested that guides are important and a limited number of guides should be maintained. One person reported that there seems to be more guides than what is allowed, and that there needs to be a way to monitor unauthorized guiding. Arguments against continued guide use include: guides are highly motivated to use any tactic they can to end up in the most highly desirable hunting areas on KBNWRC; guides belong on private property, not crowding the public unattached hunter on a public refuge; guides can earn up to $1200/day which creates highly competitive attitudes which is not in the best interest of the non-attached public hunter; hunters who are willing to pay $150-$300 an hire someone to get into a refuge at midnight, set up at dawn where the general public are low budget and intimidated by guides and the public refuge is the last place to afford to waterfowl hunt; no other Service refuge allows professional guides; there is nothing unique about the KBNWR that justifies the need for professional guides; hunting will stop being sold to the highest bidder; in

drought years fewer hunting opportunities exist and guiding causes more completion for public hunters.

Visitor Services, pheasant hunting:
We received many comments related to pheasant hunting. Several suggested that Service allow pheasants to be planted on the KBNWR, others were opposed to pheasant planting. Several discussed how pheasant hunting opportunities have declined on KBNWR and that expanding pheasant hunting opportunities is needed, and would be beneficial to the Klamath Basin community. In addition to planting pheasants, other suggestions include: leaving more habitat strips between cultivated fields; enhancing habitat; prioritizing predator control (i.e. feral cats, raccoons, coyotes) allowing pheasant hunting after 10am in the waterfowl retrieval zones; allowing Unlimited Pheasants to plant pheasants could increase revenue from sales of entry permits; Service should return to manage for proliferation of pheasants; recurrent spring burning has a deleterious effect on pheasants (i.e removal of standing grain, tule patches, and ditch banks limit cover and nesting areas and relocates birds where predators are.); Fairchild unit, Oregon Straits, and other units offer good pheasant breeding habitat; even though pheasants are a non-native species, there could be better management of both pheasants and pheasant hunting to add to recreation opportunities without impacting waterfowl.

Visitor Services, wildlife viewing: We received several comments about improving our wildlife viewing opportunities, including: increase wildlife viewing and photography and expand education; other areas like Discovery Marsh should be limited to foot traffic only; build a system of nature viewing with walking trails and a boardwalk (no observation or blind should be in an area where hunting is allowed); place walk-in blinds to accommodate 6-8 people throughout the refuge; maximize wildlife viewing; establish and update bird observation on the internet (which could be run by Klamath Basin Audubon Society or other volunteer groups) and obtain an eBIRD kiosk for refuge HQs; shift funding from hunting to birdwatching; please remove motorized boats from UKNWR; would like to see areas that are safe and easy to access for wildlife viewing, considering using electric tour buses.

Visitor Services, coordinating with Lava Beds NM: We received a handful of comments asking us to coordinate closely with neighboring Lava Beds NM, including: display the LBNM monthly schedule in refuge HQs, work with LBNM to build a hiking trail along the top of Sheepy Ridge from Camp Tulelake to Gilliam's Camp, explore linking Tulelake tour route to LBNM via West Wildlife Overlook near Sump1B; and work with LBNM regarding WWII Valor activities.

Visitor Services, environmental education:
We received many comments related to improving environmental education opportunities. Specific suggestions include: seek outdoor education efforts with Klamath Bird Observatory, Klamath Outdoor School, local schools, The Nature Conservancy, Klamath Basin Audubon Society, Klamath Wingwatchers, etc.; increase environmental education hands-on efforts for students (could be assisted by volunteers); connect with the "connecting kids with nature" group in Klamath Falls; use the leaselands program to teach that agricultural practices are compatible with wildlife; coordinate local education entities to encourage more visitation by young people in

a way that recognizes science standards that local schools must address; highlight climate change in our environmental education program.

Visitor Services, Bear Valley NWR:
We received a few comments about access at Bear Valley NWR. Some would like to see walk-in access for walk-in photography and wildlife observation; others would like walking trails and equestrian trails after eagle nesting is complete each year. If access is not possible, perhaps the Service could prepare photos of the area with nesting bald eagles so the public can see first-hand what is there and why it is such an important roosting site. Another suggested that Service host ranger-led tours. One suggested that it would be great to work with the county and private landowners to see if it is possible to develop an improved out-flight observation/interpretation area for visitor use.

Visitor Services, roads: We received several comments about roads management including: routing commercial traffic off of Stateline Road; reducing the speed limit on refuge roads to 25mph for hunters and visitors, 15-20 for refuge staff, farm vehicles, and other support vehicles; enforce the speed limit; pave certain sections of roads to minimize dust; place mileage markers along the tour routes and signage to identify units; improve wildlife viewing from Stateline Road; work with CalTrans so the entire portion of Stateline Road that crosses LKNWR has a shoulder where vehicles can pull off safely; consider additional pull offs (White Lake and other areas); the connecting road from intersection D to the southeastern part of LKNWR should be open to the public as well as the road from the intersection D to the south and other roads; constructing pullouts on the Tule Lake auto tour route with foot trails to connect to former overlooks if LBNM doesn't remove east-west wildlife overlook spur roads; "right-size" the roads system; improve signs and directions around Clear Lake; recognize auto tour routes as informational, recommended, not mandatory routes; new tour routes should be built in areas where hunting or farming is not allowed and existing tour routes should offer maximum wildlife viewing opportunities; do not separate the auto tour route from the hunting program; question why auto tour route always has better roads than hunter access, do viewers provide more money to the refuge; look at opportunities to have vehicle tour route follow marsh and other wildlife habitat areas, currently few stretches of the route don't provide much opportunity for wildlife viewing; construct and maintain route signing on West Side Hwy designating UKNWR and one information sign; and construct signage along highways pointing out UKNWR and Hanks Marsh.

LAW ENFORCEMENT:
Several encouraged us to add more law enforcement officers. One specifically suggested that law enforcement be increased on Oregon Straits Unit, including several weekends after opening weekend. One asked us to post law enforcement contact information, including on the back of the season passes.

ENVIRONMENTAL THREATS:
Weeds, invasive species:
We received a few comments related to managing weeds and invasive species. We were asked to assess the risk of invasive species to conservation targets and evaluate options for threat reduction. We were asked to consider supporting the Oregon Aquatic Invasive Species

Prevention Program in conducting roadside inspections of vehicles/boats and consider education materials informing the public about aquatic invaders. We were encouraged to conduct early detection rapid response for invasive plants and increase weed eradication and invasive plant control.

Climate changes:
We received several comments about climate change. We were encouraged to evaluate how crops, water availability (including ground water availability and surface water withdrawal), and wildlife species would be impacted by climate change. We were encouraged to describe anticipated climatic conditions (i.e. geographic, ecosystem setting, refuge resources, cultural resources, public uses, goals, objectives….) throughout the CCP. We were encouraged to acknowledge the important role climate change will play in shaping future conditions of the KBNWRC and that we should strive to promote ecosystem resiliency and evaluated how refuge management in the next 10-15 years should prepare for adaptation in the longer time frame. We were encouraged to coordinate with others throughout the region to investigate climate change and to develop a research and monitoring program as an early warning system for climate induced changes.

Misc:
Quarry operations on LKNWR needs to be stopped.

Consider placing existing overhead electrical lines underground, (use revenue from agriculture, leaselands to fund this.)

We were asked if the Service had an ear to the Obama Administration for more money.

Implement a stronger year-round predator management program, generally pertaining to egg eating critters.

Is there access to Barnes Ranch on Agency Lake? What is the expectation with removing dikes and Barnes/Agency in terms of wetland production, coverage, plant community makeup?

We received a comment re: private lands below Upper Klamath Marsh and above Kirk are along the Williamson River, drying up every summer, this area used to hold thousands of birds and provided better food than the refuge. How is refuge operations affecting this situation? (*This comment relates to Upper Klamath Marsh NWR and is out of scope of this CCP)

Coordinate with the Native American communities to help manage and use a variety of resources for cultural and educational purpose (i.e. tules, nettle, feathers, etc.)

PLANNING PROCESS:
A few commented that these refuges are some of the most important in the west and within the top 10 in the United States, and that LKNWR and TLNWR are known worldwide as important bird habitat. One commented that the Klamath needs greater protection than in recent history. Many people wrote in support of long term planning.

General planning process suggestions include: ensure compatibility of all refuge activities with purpose and mission of National Wildlife Refuge System; consider expanding the boundary of LKNWR (to the north, west, and northwest); evaluate access and options to alleviate management issues concerning current in-holdings; review administrative boundaries of the refuges (north and east boundary of UKNWR, including all lands below 4143'); dispose of smaller parcel of UKNWR (consider land trade proposal with private landowner); ensure that Service Region 1/8 Cultural Resources Team is involved throughout the CCP process; evaluate cumulative effects across the landscape; analyze direct and indirect economic benefits; ensure that economic analysis include ecosystem value with focus on economic value of fish, wildlife, and water beyond the Upper Klamath Watershed (i.e. value of migratory birds, tribes, fishermen, business beyond Upper Klamath Watershed); address ongoing environmental threats; identify mechanisms for public input during the next 10-15 years; address the treaty rights of Klamath Tribes; ensure consultation with Klamath Tribes; we were advised that the scoping notice materials did not completely describe the purposes of the refuge, so it was recommended that we include full text of all regulatory history so the public understands the agricultural purpose of the KBNWR; develop an open transparent process that the public can see how complaints are dealt with; the public should be introduced at the beginning of each public meeting so everyone knows who they represent; there should be an opportunity to share oral as well as written comments to protect the 1st Amendment; continue ALL activities outlined in the NWR System Improvement Act.