



November 17, 2015

Ms. Tina Chouinard
Natural Resource Planner, U.S. Fish and Wildlife Service
49 Plainsbrook Place
Jackson, TN 38305

RE: Felsenthal NWR Habitat Management Plan

Dear Tina,

Please accept this letter as Delta Waterfowl's official comments related to the proposed Habitat Management Plan for Felsenthal NWR. We greatly appreciate the opportunity to provide our perspective on this important issue. Felsenthal is an incredibly important resource for duck hunters in southern Arkansas and northern Louisiana. Additionally, we fully recognize the important habitat it provides to ducks including key foraging and loafing areas.

Tina, first let me commend you and your team for a very thorough and well developed Plan. The material provided well described the key resource needs, the range of management opportunities, the limitations on management (especially the limitations on traditional GTR management) as well as your well founded concerns for healthy stands of bottomland forest. I found your citations and references robust and well describing the current state of the literature.

Tina, we will constrain our comments to the issues of key importance to Delta Waterfowl and our constituents (duck hunters). Generally, we value the Service's development of the plan which provides high value duck habitat while also prioritizing extensive public use (duck hunting). While we recognize that there are tradeoffs in this sort of planning process, we appreciate the Service's efforts to balance the resource needs and management regimes with providing high quality hunting opportunities. We also understand the Service's concern about the degradation of bottomland forests and the need to relieve flooding pressure on these timber stands. While we recognize that some fractional hunting opportunity may be sacrificed by a bit lower pool elevation, we certainly understand the Service's rationale for doing so.

Tina, based on the material provided, our review and input from our stakeholders, we are supporting the key elements as described in Alternative C. Our rationale is provided below:

1. The GTR management as described in Alternative C provides an optimum balance in our view of relieving flooding pressure on bottomland forests to aid in timber health, while also providing for the high quality timber hunting for which the Refuge is well known. The flood up regime as

described in Alternative C will provide hunting opportunities that the public can depend on again while easing pressure on timber stands from prolonged inundation. Additionally, the actions under Alternative C provide greater hunting opportunity and the status quo in terms of inviolate sanctuary (the existing 9,050 acres as currently exists) better than Alternative B. This ensures that the twin needs of high quality public use with ensuring key resting and loafing areas are met in the plan.

2. The moist soil management plan offered in Alternative C should provide excellent foraging habitat which should significantly increase the carrying capacity of the Refuge. A modest reduction in peak pool elevation for this purpose is certainly warranted. We appreciate the Service's inclusion of moist soil management in the Plan.

Tina, we understand that after weighing the public comments and finishing the stakeholder engagement process that Alternatives sometimes can become "entangled" especially as various interest groups with specific concerns and/or suggestions bring their perspectives to the table, but we would sincerely appreciate your consideration of the two primary issues described above impacting ducks and duck hunters in your formulation of your final prescription.

Again, we greatly appreciate your consideration of our perspective and look forward to working with you on the Plan as it is finalized and implemented.

Sincerely,

Comment: I Like "B" Proposal
Take out sanctuary north of Highway
and add to Shallow Lake. Alternate
Sanctuary from Shallow Lake + Wildcat
every other year.

November 17, 2015

Mr. Michael Stroeh, Project Leader
United States Department of the Interior
Fish and Wildlife Service
South Arkansas Refuge Complex
5531 Highway 82 W
Crossett, AR 71935

Dear Mr. Stroeh:

Thank you for providing a copy of the Felsenthal National Wildlife (Refuge) Draft Habitat Management Plan and Environmental Assessment (draft HMP/EA). This matter is of paramount interest to myself and the constituents in my district, and after careful review, I have concerns. Therefore, please accept this letter as a statement of proposals. The table in your correspondence dated Oct 25, 2015 that gave comparison of the three alternatives (copy enclosed) caused much concern and I respectfully request that my proposals are given careful consideration.

For instance, in Plan C I would agree with the table if it reflected two tenths a day instead of one, and only draw down every other year instead of every year. The refuge was formed for waterfowl and without any water above 65 feet there is no GTR for the waterfowl. This would mean the refuge is no longer being managed for what it was form for. This is a concern of mine because my family land was taken at \$189/acre for this purpose. They were promised ducks. They were given thousands of ducks up to the last 6 years where there has been no flooding of the timber. I heard at the public meeting the public petitioning for water and the citizens was willing to give a little and only asked for the 30 day flood versus the old 90 day flood. This is a big step in playing a natural flood time line. This should allow the water to only be at 68 feet for 15 days then fall off (at a two tenths a day rise). The goal is to attract more hunters to our area, and one of the ways to accomplish this is to flood the timber and have green timber hunts. This process would not only bring more hunters in, it would bring tax dollars to the area. You (Refuge) said yourself that you were struggling with the fact of the hunter becoming

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extinct and this being your funding source (duck stamp sells). Federal government just this year raised the price of the stamp to close some of this gap.

Again, thank you for all your effort in this matter. However, I am sure you will agree that these concerns must be addressed in order to move forward on this matter. Should you have any questions or comments, please do not hesitate to contact me. I look forward to hearing from you. Thank you for your time.

Sincerely,

Tina, first of all thanks for allowing public comment as to the proposed Alternative Plans as to HMP for our Felsenthal NWR. I attended the meeting last evening in El Dorado and really listened intently to the presentation and then took time last night and early this morning to read over the information handed out and the studies performed on the Forest Health of this South Arkansas Gem. I also heard the outcry from users of the Refuge (mostly enthusiastic duck hunters). If I understood correctly, the Plans could be combined to some degree to create a Combination Alternative and that would not impede on each of the six objectives that encompass the overall HMP Plan. If that is the case, no one had any issues on Objectives 1, 2, 3 or 5, all the questions and outcry was on Objective 4 and 6. I would ask that consideration be given to raising the water level to 68' msl starting November 20th or so and then begin to let down January 16 of each year, which would provide water for the ducks and the hunters. I really do not see what is gained by closing the roads being that they are a small percentage of the land base and I would find it hard to believe that the issues raised for the closing has much of an overall impact on total NWR forest health and water quality.

I am not a professional forester, but the tree loss in the NWR (bottomland) is due to the change of the overall ecosystem. This was set in place with the creation of the lock and dam, when you impede natural water flow and pinch it down you change the ecosystem, this was bound to happen no matter what is done as to the manipulation of the water level during the dormant season. It all has to do with the water getting off the timber during the growing season, which starts in the Spring which is the time of the year this water shed is at its highest level. With the lock and dam in place, it takes longer for the water to pass through and the trees are stressed. You are documenting the inevitable. So unless you are going to take the dam out, I would suggest you work with what has been created, which is not all bad, sure the trees are gone, and would be 100 years to get them back and again, if that is the plan, need to work to remove the locks and let Nature take its course.

I believe drawing the one foot down during the summer would be greatly beneficial to the whole ecosystem as pointed out and would provide a food source for the winter duck migration. I would also suggest that during this draw down, why not plant some sort of native plant that would even give greater benefit to the ducks and other wildlife, be money well spent.

Again, thanks for the opportunity to comment and I know everyone is wanting the best for our NWR.

To Whom It May Concern:

Let me start out by saying you have screwed up the hunting and fishing when you first took over. I was raised at Shallow Lake. My grandfather James Thomas Bolding run a boat ramp down there until 1975. I also had a Great Uncle named Claude Bolding that you took his block house away from him then also.

I would like to see the GOVERNMENT OR REFUGE let us alone. We don't need any more land taken away from people. We are all ready having problems with the bears you brought in down there. When are you going to open season on them. We can't deer hunt down there now for the bears taring everybody's stuff up. I think maybe you need to be more worried about them than taking stuff away form citizens. Where can we start sending you bills for our equipment they are taring up. Between you and the timber company get through with everything a man can't afford to keep paying for equipment to hunt with and the bears taring them up.

All I am asking is PLEASE DON'T TAKE NO MORE LAND AND LEAVE THE REFUGE ALONE.

Strong support for the 1 foot drawdown every year to promote moist soil growth as a food source for ducks. Strongly suggest that this option be explained at subsequent meetings. This is the one item which would improve duck hunting at Felsenthal. Food is the primary reason ducks use a particular area and this would provide good duck food in large quantities.

Most of the controversy at the meeting concerned the green tree reservoir feature. Additional research needs to be accomplished to boost confidence in manipulation used. Most people in Arkansas know of reservoirs which have been hunted and flooded for many years, often 70 to 80 years which continue to have healthy trees and

good duck usage. Given the wide interest levels, an intergovernmental research effort which drew on the experience of existing private duck clubs would be beneficial. Mickey Heitmeyer has the confidence of governmental and private groups and the expertise to conduct such a study.

Finally, the proposed alternatives as to GTR management that involve fluctuation of depth would seem to be beneficial. This could help utilization of moist soil areas by making access less difficult. It also would seem that fluctuation over the mid-November to late January or early February would make the most food available to ducks, as well as easing access at times.

Finally, thank you for the presentation and the effort behind it.

Buy moving the sanctuary to shallow lake this will eliminate a lot of productive hunting ground. My thoughts on that are not to do it ducks are repopulating as fast if not faster than they are being harvested. As far as timber dying I believe that problem can be eliminated by not allowing plum creek and others to spray chemicals on their clear cuts. The chemicals get in the ground, and when it rains they come down stream through the saline and quachita rivers and kill timber. I believe as far as water levels raising it would not be an issue. I love waterfowl hunting and management and I love hunting felsenthal as I did overflow. I believe we should not change anything for felsenthal other than water levels. I have already stopped hunting over flow due to water levels and poor management. And would do the same if felsenthal gets ruined and I'm sure I speak for other waterfowlers that are scared to speak up. I hope this helps make a decision thank you for taking the time to read this. GOD BLESS YOU ALL.

I'm unable to make it to any of the meetings concerning this issue so I thought I would send an email with a few of my thoughts. Looking over the proposals I am inclined to lean more towards a combination of the proposals. From talking with other waterfowl hunters it seems more people lean towards Proposal C and the reason most of them do that is to have the guarantee of flooding in December and January. I do agree that it would be nice to have some sort of a guaranteed ability to hunt flooded timber. But over the past few years we have gotten water at some point every year throughout duck season anyhow. A lot of hunters don't realize that the Northern (above 82 Bridge) part of the refuge floods because all they pay attention to is the reading at the lock and dam. Another reason a lot of waterfowl hunters lean towards Proposal C is Shallow Lake area does hold a lot of ducks at certain times of the season. They have killed ducks there before at some point or another and a lot of them are afraid of change in all honesty. My opinion of the Shallow Lake area of the refuge is different than some. I believe it to be an overrated mud hole. The only things that can be done with the vast majority of the land that is proposed to be taken in as the new sanctuary in the fall/winter: is to raise some wood peckers and allow a few ducks to play in the mud. You can't go down there and do any other type of hunting at Shallow Lake besides duck hunting. Really the only people that should have a legitimate complaint about losing that end of Shallow Lake and Fishtrap would be fisherman. The hunters I know that grew up hunting the refuge through the 80's and 90's and had water every year in the timber would most certainly prefer trading the lands North and West of the Saline River for Shallow Lake. In my opinion, if the Refuge is truly managed for hunters and recreational purposes then Shallow Lake would be gone and the timber above the bridge would be able to be hunted. It makes the sanctuary smaller - meaning more land overall to be hunted. Hunter participation is a term that gets thrown around a lot when concerning public lands. I'm really not sure why taking away existing ATV trails would benefit anyone other than the people who maintain them to begin with. It doesn't help anyone that visits the refuge in any shape or manner.

Therefore here are my suggestions (Proposal D).

1. Take in Shallow Lake area as proposed. The wood peckers seem to be a driving force behind some of these changes so go ahead and knock that out first. But if that is taken in then give the hunters everything North of the Ouachitia River.

2. Scheduled flooding as proposed Dec 15th - Jan 15th. This is a key point for hunters supporting any changes. Other areas around the state such as Bayou Meto, Black River, Hurricane, Cutoff, Seven Devils (to name a few) have flooding in hardwood bottoms every year for waterfowl and do not seem to have an issue with timber dying. Reason we have timber dying still is because the spring floods keep water in the woods up until late May not because of water in December and January. The deadening areas in the refuge are just simply gone. Can't do anything for them short of blowing up the dam and letting everything return to true historic flooding and water levels.

3. Practice the proposed draw downs as best agreed upon by knowledgeable experts (1-3 year draw down etc). But clear primary boating lanes and access points of debris and other things to maintain public safety. As long as, dropping the water allows everyone to get to their favorite fishing holes without ripping the motor off of their boat then I see no reason why anyone would be against this practice.

4. Leave the ATV trails alone. I don't even use any of these trails but there are plenty of people who do. Elderly and handicapped refuge users would be restricted even more so if some of these trails are phased out. They are already in place and it does not require anymore effort to maintain them then what is currently being used.

I realize that there is no perfect answer to any of this and you will always have a group or groups that are unhappy. The way to appease the waterfowlers is a simple solution. Guarantee some flooding during duck season and most will be content.

As an out-of-state and non-resident hunter of Felsenthal NWR for several years, I fully support alternative A of the Proposed Habitat Management Plan. This is a beautiful tract of land that is historically known for providing refuge to waterfowl and other migratory birds. It would be ashame to ruin this breathtaking scenery with a forest management plan.

Sincerely,

Hello Tina,

The Felsenthal website suggested to send comments to you via email. After reviewing the management options that are proposed by the USFWS, I feel as if Alternative C would provide the NWR with habitat that will most effectively satisfy the desires of a diverse community of wildlife as well as pleasing the public to the best of the NWR's ability. The NWR currently provides quality habitat for many species present across the land, except for the community that was initially targeted (waterfowl). One of the main purposes and concerns among creation of the Felsenthal NWR was to provide excellent waterfowl habitat throughout the winter months, and create the largest green-tree reservoir in the area (21,000 acres) as the proposed Habitat Management Plan states, "The primary objective of the refuge is to provide high-quality wintering and resident waterfowl habitat..." .

I do agree with the plan on the fact that prolonged flooding has increased the mortality among red oak species that provide quality food for dabbling and perching ducks. These red oak species are essential to supplying adequate food supplies and habitat for waterfowl. However, flooding during the dormant period is/was not the problem with the current mortality of trees. The kill of these species is primarily due to the "prolonged" flood periods in which the water was not removed from the forested areas before the trees began to enter into their growing season. In depressions in which water remains throughout the growing season, even hardwoods native to the area may succumb (Broadfoot & Williston, 1973.) Also within the proposed Habitat Management Plan, it is mentioned that the mortality and lack of regeneration is primarily within the lower lying areas of the NWR. This could be due to the rise of the water table from the introduction of the permanent pool, but this was never discussed within the plan. Raising the water table for the area can result in root kill of the trees eventually resulting in high mortality. The rise of the water table would alter the silviculture of the surrounding forest to more of a wet-land type forest, which from the proposed plan, seems to be the reason for the red oak mortality. When addressing the problems with tree mortality, the surface water is not the only aquatic aspect that should be taken into consideration.

Alternative C suggests removing the flood waters earlier than the original plan. With earlier removal of the artificial flood pool the mortality from spring-early summer flooding should be reduced. Therefore by implementing this alternative, the initial goals of the NWR can still be met while maintaining a healthy bottom-land forest. Alternative C also offers the highest number of RCW clusters in the objectives for maintaining the endangered species.

I feel that by achieving the initial goals of the NWR, the public will be able to utilize the area in the fullest extent. It will supply great habitat for different game species such white-tail deer, eastern-wild turkey, and also various species of waterfowl. The fluctuations in water levels throughout the year should also increase habitat for various fishes. In return, more sport fishing would be conducted across the NWR. This seems to be the most versatile Alternative, that would increase the various usages of the NWR and maximize its potential.

I am an avid hunter and fisherman who spends a lot of time using the resources the Felsenthal provides. In my opinion the best alternative is a mixture of plans B and C.

As a duck hunter the raising of water is paramount. If there's no water, eventually the ducks will stop coming to our area. This plan also alleviates the issue of moving the sanctuary further south.

As a fisherman, I understand the benefits of a drawdown. Lake Chicot has been doing this every few years with great benefit to the bass population. The lake itself and the fish caught appear very healthy.

With all that being said, my proposal for an acceptable option for all concerned parties would be C's plan of raising water annually with B's every three year drawdown.

Comment: I attended the meeting at Warren on 11-10-15 and Listen to your proposal and the comments that were made. Every few years or with a new leader at Felsenthal a new plan is prepared seeming to get away from the original intent of creating the refuge. The original plan and the way it was sold to taxpayers was to develop navigation and develop a wintering waterfowl refuge. The original plan worked and then somebody decided to start changing things. If it's not broke don't fix it, go back to at least something similar to the original plan and stewardship of this resource. As promised when the refuge was formed many hunting and recreational opportunities were provided. Now not so many as seen by the declining use of the refuge.

To whom it may concern:

First, I am appreciate and commend you that you are taking time to host informational meetings in Union, Bradley and Ashley Counties and allowing individuals to voice their opinion through these meetings or through emails such as this. I am an avid outdoorsman which grew up hunting and fishing Felsenthal. To this day, I still frequent the refuge for various activities. I want everyone to keep in mind that this National Refuge is the "People's" Refuge not the "Governments" Refuge.

Water Management:

I am having a very hard time buying into the reason why the decision makers are not wanting to hold water every year for duck hunting is because it is damaging/killing the trees. This land has been in existence for hundreds if not thousands of years with natural flooding's occurring very frequently. You cannot tell that the reason the trees are dying is because of the water! The reason why the trees are dying is because this is nature's way of taking care of itself. Also, Bayou Meta has been in existence since 1948 for the purpose of, and I quote, "to accommodate the desire by state residents for more public hunting and fishing". This is the exact same reason why Felsenthal National Refuge was created. Correct? Since Bayou Meta was established 1948, this land has been flooded artificially every year for the purpose of duck hunting. We hear no correspondence/argument from the Arkansas Game and Fish Commission that the water is killing the trees. I ask the question, what is the difference? So again, artificially holding water for a short time during the winter

while the trees are dormant, is not killing them. **I am for Alternative C as proposed in your Habitat Management Plan.**

ATV Trails:

As stated in the previous paragraph, this is the "People's" Refuge. If you continue to take away ATV trails, how will the people be able to access the land? There are all different types of demographics that utilize this land. Young, Old, and Disabled just to name a few. How do you explain to an elderly or disabled person that they cannot access the majority of the land because they cannot drive their ATV? It can't be explained. **I am for Alternative C as proposed in your Habitat Management Plan.**

Again, I appreciate your time and effort to listen to all opinions. I would be willing to discuss this with anyone in greater detail at your convenience. I have also asked several questions within the body of the email that I would appreciate feedback on. I have also listed these questions below for your convenience.

1. Why was Felsenthal created?
 2. What is the difference between Felsenthal National Refuge and Bayou Meta as it pertains to holding water and the thought as to why it is perceived that water is killing the trees in Felsenthal and not in Bayou Meta.
 3. How do you explain taking away ATV trails within Felsenthal?
-

I am for Alternative C as proposed in your Habitat Management Plan.

Please see attached:

To whom it may concern:

Introduction

I would like to begin by thanking the U.S. Fish and Wildlife Service (USFWS) for continuing to improve the ecological system of the Felsenthal National Wildlife Refuge, as well as providing an opportunity for the public to provide feedback for the 3 management options. After perusing the Habitat Management Plan (HMP) and the Habitat Management Plan Fact Sheet (HMPFS), I, as an avid outdoorsman and recipient of a Bachelor's of Science in Forestry hope to provide qualified feedback. My fact-based and experiential opinion is focused on bottomland hardwood management. Alternative C would provide the USFWS with an opportunity to restore degraded and manipulated forested habitats while improving species management, particularly waterfowl at a greater rate than Alternative A and B.

Water Management Plan Response

Alternative C would provide refuge managers an opportunity to obtain similar historic conditions of the watershed found on Page 43 of the HMP. It is also important to note that the creation of the Felsenthal Pool altered and degraded roughly 15,000 acres of bottomland hardwood species when the pool stage was raised to 65' MSL in 1985 (p.50). One report stated that "Tree Vigor has decreased and subsequent mortality appears to be inevitable" (p.51). The HMP should factor in such losses and changes, and while a full spread regeneration is

highly unlikely and improbable, dropping the pool stage to 64' MSL can provide positive impacts on bottomland hardwood regeneration.

Areas inundated during the summer months in the current HMP would now have an opportunity to allow natural succession to occur thus promoting regeneration of more tolerant white and red oak species (*Quercus lyrata*, *Quercus phellos*, and *Quercus nuttalli*). A report conducted on the Felsenthal NWR revealed that 2.6% annual mortality had been discovered across the refuge and a mortality of 1% was desired. Pool levels roughly 1' below bankfull is a major factor in such mortality rates and a yearly draw down could limit mortality. Dropping the pool to 64' MSL would allow residual hardwood communities an opportunity to develop more extensive root systems that increase overall stand health and prevent common bottomland mortality events (i.e. Blowdowns). In closing this section, "The Lock and Dams have altered the hydrology of the area for a long time and vegetation communities are changing as a result" (p. 54), and intensive water management plans can directly influence desired ecological changes, in this case, bottomland hardwood regeneration and residual stand health.

Day Use Activities

With the objectives of the HMP outlined, consideration for active users of the refuge must be conducted. One area absent from the HMP was an estimated day use report that factored how many users and the types of activities they took part in while on the refuge. Based on common knowledge from utilizing the refuge for over 10 years, waterfowl hunting is the most common winter activity on the refuge. The Green Tree Reservoir plan established in 1985 was designed to bring the pool stage from 65' msl up 5' flooding an additional 21,000 acres (p. 50). The current management plan is to maintain the pool stage at 65' msl and allow for natural flooding to occur. Such actions during dry winters as witnessed in 2014-2015, drastically increases waterfowl hunting pressure on the refuge as the amount of waterfowl habitat is limited. The authors of the HMP cite that "An additional essential component of waterfowl wintering habitat complexity is sanctuary from human disturbance" (p. 66).

Alternative C allows for the hunting area to be increased as the water level is brought up to 68' msl. In addition, the same volume of hunters are now spread out across more acreage. Furthermore, this water level allows for migratory game birds to capitalize on forested sanctuaries and feed sources absent on the sand prairies that dominate the refuge. A progressive approach to flooding the area will allow for less hunting pressure and more available waterfowl habitat on the refuge. Ensuring that flood waters will be removed from the refuge as soon as possible is key in this management style in order to maintain stand health.

Conclusion

The Ouachita River and Saline River watersheds influence water management plans of the Felsenthal National Wildlife Refuge. Each plan is subject to rainfall totals. However, in years of normal rainfall, the proper water management plan can improve ecological conditions. Each alternative Habitat Management Plan has pros and cons, but I ask that the U.S. Fish and Wildlife Service factor the active users into the Habitat Management Plan selected. Alternative C appears to be the most sensible option factoring in stand health of bottomland hardwood species and accounting for active users of the refuge.

I have attached my comments in regards to the changes to the Felsenthal NWR Management Plan. I also want to take a second to reiterate how thankful I am for being able to be a part of this meeting and I hope you will involve local residents more in the management of the refuge in the future. I thought you and the other staff present at the meeting did a great job of hosting the meeting and even though I have some of my own differing

opinions about the future management of the refuge, I think the meeting and the way it was presented reflects a welcome change in the leadership of the refuge staff.

I hope you will seriously consider these comments and suggestions and know that I approach this as a user of the refuge but also as someone who wants to conserve and protect it as much as possible.

Tina Chouinard

Natural Resource Planner U.S. Fish and Wildlife Service

49 Plainsbrook Place

Jackson, TN 38305

Felsenthal NWR Proposed Management Plan

Comments and Proposed Changes

I want to thank you for holding the meeting, in El Dorado about the future management of Felsenthal NWR. Being the largest county in Arkansas and with El Dorado being the largest town close to Felsenthal, I think it is of vital importance that the citizens of this area be involved as much as possible in future meetings and decisions on the refuge. I don't think that has happened in the past. These changes will have major impacts to the future of the refuge. If the people running the refuge continue to operate in the environment of the federal government and if the refuge is run from Washington DC without the input of those who live here and use the refuge then the wrong decisions will be made. One of the biggest things I can say that I like about the proposed plan is that there appears to be some common sense going into the management of the woodpeckers. If the habitat not there, then it doesn't make sense to manage for the impossible. I wish something could be done about the timber companies' clear cutting practices on surrounding land and the lost habitat but that isn't something that Felsenthal NWR can tackle. So managing what you have with the resources available is what needs to happen.

However, I think the rest of the plan needs some work. I think an Option D would be better suited. Here is my proposed Option D

1: Over All Timber Management

As I've already stated, the information regarding the timber management for the

woodpeckers that was presented in El Dorado seemed logical. I don't have a lot of specific ideas on this area other than to say this. Lets keep future logging to a minimum. I feel like when the thinning operation took place a few years ago, it started out ok and then someone got greedy as the project went on. It seems to me that too many trees and prime hardwoods were cut in some areas. I'm not a forester, but that's my observation. At this point it would make me happy to never see another log pulled out of there.

As far the management of the refuge for pine or upland hardwoods goes, I'd like to see as much of it as upland hardwoods with mixed pine and bottomland hardwoods as possible. I believe that is what was in this area naturally. Far too much of south Arkansas has been transitioned to pine timber when naturally it should have a mixture of hardwoods and pine. I think this has caused major changes to the habitat in this area and I would hope that Felsenthal NWR would remain an oasis of native plants and animals for people years from now to be able to point to and say, "this is what south Arkansas is supposed to look like."

2: Draw down every 3rd year.

I think this part of the original proposal is good and should stay. I think this will help the fish as well as the waterfowl. The draw down should be used to repair the boat ramps that need work. Part of this proposal should also include dredging the cuts off of the main river channel that have silted to allow safe passage.

3: Begin to raise water to 68' beginning Nov1 and begin lowering by Jan 31

One of the primary reasons the lock was built in the early 1980's was to provide a means of seasonal flooding for waterfowl. Unfortunately, 30+ years of mismanagement of the water has killed the majority of the Green Tree Reservoir. That's the ugly truth of the matter. If people back then had known what was going to happen to the gorgeous river bottoms in the hands of the federal government, Felsenthal NWR would not exist today. Granted, we are all thankful that they aren't huge clear cuts in the hands of timber companies either, but still the refuge management over the past has forever impacted the environment only

in different ways. To now suggest with such a broad stroke that seasonal flooding for waterfowl is killing the trees is a failure to admit the obvious mismanagement exists. If you want natural flooding events, then remove the dam and plant native trees back where they belong in the 62'-66' msl range. In 100 years it might start to look right again.

In the mean time, I don't feel that there is conclusive evidence that the trees are being damaged by artificially flooding the GTR in general. Arkansas Game and Fish Commission and other private landowners have been successfully managing GTRs for longer than Felsenthal has existed. Granted, Felsenthal is larger and more diverse, but the same issues in regards to tree health exist in both places. The predominant factor is that in many years, the water levels in Felsenthal have been allowed to stay at or above flood stage well into the growing season. That factor alone is what is killing the trees and not the flooding during the dormant season.

Significant research by Dr. Heitmeyer and leading researchers suggest that waterfowl need flooded timber during late winter to help them as they migrate back north for nesting. A happy medium needs to be reached between this and the health of the trees. Doing away with the flooded timber is obviously not good for the ducks but flooding during spring and early summer is not good either.

Even with significant rainfall, beginning to lower the water at the end of January, should give you plenty of time to get the water out of the timber. During this draw down, some flooding during February should still exist for the ducks when hunting pressure is off.

I'd like to see a task group formed to collect data from the Corp of Engineers that addresses how quickly and under what conditions water can be pulled off of the refuge. In today's world of technology, I would think that with this data, the Corp of Engineers could do a decent job of predicting weather and adjusting river flow to make the refuge artificially flood yet also mimic natural flood patterns. I'd also like to see some cooperative efforts to work together with Arkansas Game & Fish

Commission and other GTR managers to address what makes those areas work that isn't working in Felsenthal. It seems like at times there is a turf war between the USFWS and AGFC and both organizations have shared goals. If additional data collected from these entities suggest changes to the management plan before this management plan period expires, then those changes should be made sooner rather than later.

This water management plan is only slightly different from Plan C in that it allows duck hunters another week or so to finish the season before lowering the water. Not only does this allow the hunters to hunt this flooded timber, it also helps spread the hunters out which leads to my next point.

4: 4am Rule

In recent years, lower water levels during hunting season and the 4am rule combined with the increasing popularity of waterfowl hunting have created significant hazards as people race for hunting spots. I have hunted in Felsenthal for my entire life and as a kid and through my early 20's, I spent many nights sitting in the bottom of a freezing cold boat, cooking on an old Colman stove that belonged to my great grandparents and enjoying this time with friends and family while sitting in a hunting spot. However I never once saw the dangerous conditions that I see now from hunters as they try to get to their favorite hunting spot after 4 am. It has gotten to the point where I seriously question taking kids duck hunting with me and even hunting Felsenthal myself.

Part of the problem is not boat racing, it's the fact that with lower water levels in addition to the 4am rule, hunters go to the spot they want to hunt and someone beat them there. At this point the second group has to find a new spot. Whether it is a real time constraint or a perceived time constraint, the second group rushes to get to another spot. If an accident didn't happen on the way in, this is where it will happen or the second group doesn't move far enough from the first group. Tempers often flare as the two groups compete for the same ducks. A recent televised IPSC shooting match held at Smith and Wesson's factory range even

featured a practical shooting course scenario where people were duck hunting and a boat of angry hunters pulled up and began assaulting another hunting party. It's almost unimaginable that things have gotten to this point where people are training for self defense during a hunt, but they have, and hunting regulations on public land is at the root of the cause.

The best course of action that I see to deal with the problem is to remove the 4am rule and allow as much room for hunters as possible in both time and area.

While I agree that waterfowl shouldn't be disturbed all night long, I've seen no evidence presented that the 4am rule is truly beneficial to waterfowl in any way and it seems like it was enacted purely because other WMA's were doing it.

However, those areas have also experienced the same dangerous scenarios due to hunter crowding and boating accidents. I think the reality is that boats trickling into their preferred hunting location over the course of several hours is no more disruptive and possibly even less disruptive to the waterfowl than a lot of boats rushing in after 4am. Am I going to spend all night down there at this point?

Probably not. I'm not 21 anymore. But, removing the real or perceived time constraint and giving hunters ample time to move about the refuge will help avoid serious boating accidents or worse, violent action by someone who can't control their temper.

5: Sanctuary

Moving the sanctuary boundary to include shallow lake and giving up everything north of the saline river seems like a bit of a smoke and mirrors approach to appeasing duck hunters. On one hand you are taking a little and giving a lot, but that is only the case if flooding occurs on the north end. If flooding doesn't occur, then there is potentially less huntable area. In my proposal, I can go either way on this issue because as I've already suggested, Proposal D allows for seasonal flooding. I'd love to hunt some of those areas that are currently sanctuary on the north end, and personally, I don't like hunting in the mud hole that is currently shallow lake.

6: LEAVE THE ATV TRAILS ALONE and remove some of the restrictions on their use.

In the grand scheme of things there are not that many ATV trails in Felsenthal to begin with. The management plans presents the data in a way that leads one to believe that there is easy access to most of Felsenthal. That's a bit misleading.

The main access route to most of Felsenthal is by boat. Not by car.

I do significant work with wounded veterans and disabled youth. On a recent hunt in Louisiana, a specialized boat with a crane had to be used to hoist a disabled veteran into the boat to allow him and his wife to enjoy an organized event with fellow veterans. This boat cost well over \$50,000 and was provided to a nonprofit organization by sponsors for this type of activity.

The average person does not have these resources. Disabled veterans of all people should be able to use federal lands as much as possible. Removing any ATV trails reduces their access. All handicapped people should have access. In addition, a lot of people who use the trails whether it be for hunting or bird watching or other uses may not meet the legal definition of disabled but are still not physically able to walk ½ mile or more through the woods without these trails in place.

Most, if not all, of the ATV trails were in place long before Felsenthal or executive order 11644, E.O.

11989 existed but alas, section 9(a) of this order doesn't just say to close the trails, it says to close them "IF" damage is occurring. The management plan doesn't specify where, and what type of damage is occurring. It goes on to lists some broad, potential negative effects of hypothetical damage due to ATV use. However, I do not see where any data is presented that supports the assumption that these things are in fact happening in Felsenthal. Even if there is ATV Trail Damage and the hypothetical negatives are occurring. The executive order doesn't just say to close the trails for good. It says to close them "until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence."

Based on this, you need to present adequate evidence that damage is in fact occurring and specifically how it is negatively impacting the refuge beyond hypothetical examples before you do in fact close any trails. Without this information, it is impossible to assess what remedies need to be made to the trails and when they may be reopened. But the fact that trails that predate Felsenthal exist and are still in use does not mean that a problem exists on its own.

In addition, the regulations currently in place on the refuge ban most modern UTVs. For someone who is disabled, UTVs are much easier to get into and out of because the rider doesn't have to lift a leg up over the seat. Current production models of UTVs should not be banned. I understand that we don't want to turn Felsenthal into a mud bog and aggressive driving and aggressive tires should not be used on the refuge but most current production UTVs exceed 700ccs. The Polaris Ranger is the number one selling UTV in America. I believe they start at 800ccs and many UTVs are in the 900-1200cc range. If the concern with engine size is reckless driving and trail damage, then I would suggest a regulation that imposes fines for that and speed limit signs posted at the trailhead.

7: Eradicate the Hogs

Hogs are one of the biggest threats to conservation on the refuge. It is a far greater real threat to more species on the refuge than any other singular issue. Yet, some areas of the refuge look like log skidders have been through there due to hog damage and still I see almost nothing in the current management plan or the proposed changes that addresses the hog problem. It's a widely known problem and not enough is being done about it. Obviously hunting is only a piece of the solution but let us help you. Not only should you open the refuge to killing hogs on sight, I think you should add a quota hog hunt to encourage killing as many of them as possible and make it clear that this is not a hunting management practice. This is an eradication mission.

The management plan states "Methods for feral swine control/eradication include trapping and shooting by Service employees." Quite frankly, that is an appalling statement. Felsenthal NWR is not "the kings woods" and it is not a private hunting property for refuge staff appointed by the king. The current regulations restrict our ability to hunt these animals to a modern gun or muzzleloader quota hunt. I understand not allowing dogs to be used to hunt hogs, but beyond that; they should be shot on sight and there should be no further restrictions on killing them. PERIOD.

I understand the concern is that people might be shooting deer and claiming they are hog hunting. However, people are supposed to be innocent until proven guilty this regulation assumes that everyone is guilty until proven innocent. You have to have a little bit of trust in people because the vast majority of us are trying to do the right thing. So don't make rules that violate the principles of the 6th amendment and derail the objective of getting rid of the hogs.

8: 25 shell limit

I fully support restricting duck hunters to a 25 shell limit. In fact, I wouldn't mind seeing a 15 shell limit like Bayou Meto WMA. This prevents "skybusting" or

shooting at ducks beyond the effective lethal range of the shotgun and makes hunters take better, more ethical shots. But there are some issues with the wording of the current regulation.

Currently the refuge regulations state:

“Possession and discharge of more than 25 shot shells on persons or in vehicles is prohibited for all hunters during waterfowl hunting season.”

And

“Hunters may not enter the hunting area before 4 am. Hunting ends at noon each day. Only portable blinds are permitted. All duck hunting equipment (blinds, guns, decoys, etc.) must be removed by 1:30 pm each day, either to a designated camping area, vehicle or off the Refuge. Unlawful to discharge or possess more than 25 shotshells per person, per day except during Refuge Waterfowl Youth Hunt. September teal season shooting hours are from sunrise until noon.”

While these two statements from the use permit may seem similar, the key issue and difference between these two statements is that law-abiding hunters are being fined for having more than 25 shells in their truck when parked on the refuge. Its Not that they are hunting with more than 25 shells but that there just happened to be an extra box of shells in their vehicle. You can't just make blanket assumption that everyone with 26+ shells in their truck has criminal intent. Many of us live on the road and especially during hunting season.

Whether the person is traveling, camping, or something else entirely, there are a multitude of very valid and legal reasons, a person may have more than 25 rounds in his or her vehicle that doesn't include hunting with them. A person's vehicle is an extension of their home. This is echoed in Arkansas' gun laws in regards to the definition of a “journey” and many other legal precedents across the nation. The fact that a person has shells stored in their vehicle should not make them a criminal alone. However, if a person has more than 25 shells on their person, in their hunting coat, in their boat/atv while hunting, or is observed going back to their vehicle to get more than 25 shells, then I fully expect that

person to be charged for the violation.

At a minimum, the first section needs to be changed to clear up the confusion and mirror the second statement. A better statement would be as follows,

“Possession and discharge of more than 25 shot shells on persons or in vehicles is prohibited for all hunters during waterfowl hunting season.”

Lastly, I'd like to thank you again for the chance to attend the meeting in El Dorado and for a chance to submit comments in regards to the future management of Felsenthal NWR. The management of the refuge affects not only the wildlife and habitat within the refuge, but also the surrounding communities due to tourism dollars spent or not spent by people who use the refuge. I personally know a lot of people who have either given up duck hunting all together (no longer buy duck stamps) or have sworn off Felsenthal and no longer use the refuge due to issues over the last several years. I'd like to see that trend reversed. In the end, we all just want what's best for the refuge, what's best for the wildlife, and to be able to enjoy the incredible resources that God has given us.

Sincerely;

Tina Chouinard,

I have been disappointed to say the least in the current handling of Felsenthal NWR and look forward to a change. As a resident that grew up hunting Felsenthal NWR flooded green timber since the mid 80's, the past 5+ years have been poor if not pathetic. I understand the need to manage the timber, however, there are countless other areas statewide that flood timber in the winter with no habitat issues. With no flooding of the Oak timber, Felsenthal has nothing to offer migrating ducks besides water to rest on overnight. There is little nutrition in the aquatic vegetation that grows in the mud flats.

Basically, I am whole heartedly in favor of **option C** even though 68 feet does not really flood most of the timber. I would also like to make a few additional points that I believe should be considered.

- Stop cutting Oak timber! To act so worried about killing Oak trees with water, what do you think happens when a chainsaw hits it? If an area does needs to be cut to “manage” it. Please cut more selectively. I have seen areas on the north side of Felsenthal that you cannot walk through after the trees were removed. It is thicket. There is no way to use it, hunting or otherwise.

- Also consider not burning during spring nesting time for Turkeys. Also, the burning is killing what little Oak timber is left in the hills. Please look into a better management method that is less destructive.
- Eliminate the Cooperation with the AGFC Feral Hog Control Program ban on not killing hogs with archery equipment or 22's while squirrel hunting. I do not know how many hogs were trapped and wasted by dumping them but I know it was significant due to the high water in the spring. But I do know there is no way that the AGFC can determine how many hogs are killed yearly by opportunistic hunters, so there is no evidence trapping is more effective.
- Start stocking Largemouth Bass, again.
- Consider a ban on mud motors or at least a decibel requirement that they should operate under which would prohibit running one without sufficient mufflers. The mud boats going out across flats sounding like a race car is pushing ducks off the water before daylight.
- The boat channel to Wildcat needs to be dredged deeper. That area will be silted solid soon especially if the water level is lowered in the summer.
- I'm not sure why some ATV trails are being closed. If it is truly soil erosion there are numerous trails being used by park personnel to trap hogs and check on bears that are worse than the main trails.

Also, if the plan turns out to be option A, to continue as we have the past years with no change to water management, then I think the rest area should be minimized, eliminated or at least alternated to be open some period of time. There is not many options to hunt a safe distance from other hunters with such a large area of huntable water designated as a rest area.

I do believe, if the right management practices are used, then there is an abundance of wildlife as well as hunters and fisherman that can benefit from Felsenthal NWR.

Thanks

To Whom it may concern,

>

>My name is ***** from El Dorado. I have hunted and fished in the Ouachita River bottoms for 45 years. I really love to hunt and fish in the refuge. For the first >25 years after the refuge was formed they flooded the GTR annually. It provided some >of the best flooded timber hunts I have ever been a part of anywhere in this state. >Now and in the last 10 years there has been no intentional flooding of the GTR plus >you have closed 30% of the ATV trails that limits access to the refuge especially >for someone 65 years of age like me.

>

>My opinion is you should not close any more trails and should re open the trails >around Jones Lake and Pereogeethe Lake.

>

>I know your supposed reason for not flooding the GTR and I don't agree. I am no expert >but I am a surveyor and had three years of college study in forestry. There may be

>some problems with regeneration on the South one-third of the refuge but I don't see
>a problem above highway 82.
>I say a 3 year rotation would work. No flooding then up to 68 feet, then full pool to
>70 feet with no excuses.

As a long time hunter and user of this refuge, I am disappointed that there appears to be little to no concern for the hunter's use of the refuge as we are the primary users impacted by the proposed plan. I support option C as it affords the use of the refuge as a green tree reservoir. I will agree that the past management practices of flooding the refuge the same way year after year is not good for the resource or the hunters. But, I do not agree with a complete abandonment of flooding. There is very little bottom land hardwood habitat left for the average Joe public land user to enjoy. The bottom can be flooded later in the year without further damaging the forest.

I am also disappointed the current management of the refuge does not know (as admitted in the El Dorado meetings) what the past managers have done. For example, why was the refuge cut on the north end so hard in 2005 and now the management does not want any flooding. Seems to me and others what the public land hunters are paying for a mistake in the past management of the resource.

Also, as a refuge user, I do not agree with removing the large amount of ATV trails as proposed in plan B. The area is too large to access on foot and would eliminate many users for this reason.

The expansion of the sanctuaries in plan B will create an unsafe environment for the duck hunters due to the lack of area to hunt. Why can we not plant a desperately needed food source in the area for the ducks to utilize. The Ouachita flood basin does not have the food source available for waterfowl as does the Arkansas, White/Cache and Mississippi river basins.

Felsenthal and the Overflow NWR are places that I fell in love with at a very early age. I am fully aware that changes need to be made to suit the refuges for future generations, but I do not feel that the plan B is the best option for the refuge or the users.

I hope our comments are taken genuinely for the multitude of people that our concerned about the future of our refuge. I believe that people want what is best for both the refuge and the hunters to sustain these great places for future generations.

Thanks for considering my concerns.

Hi,

After reviewing the full HMP, I've noticed some very disturbing proposed changes that have the potential to significantly alter public use of the refuge. First, I don't believe enough data has been presented to justify the closing of any ATV trails, especially the trails located south of Hwy 82. These ATV trails are crucial for public access to the refuge. Without them, access is being reduced to boat only, which many hunters, photographers, fisherman, and others don't have. The disturbance the trails cause to wildlife and habitat have not been properly studied to justify making such drastic changes. I believe no changes whatsoever should be made to the ATV trail system. Second, the relocation of the waterfowl sanctuary to the shallow lake area just cannot be allowed to happen. This will take vital acres from the already limited 15,000 acre pool, causing even more crowding than what already exist on the refuge. From personal experience, Felsenthal is by far the most crowded public land in southeast Arkansas. Reducing the flood pool access is only going to increase this problem with both hunters and fishermen. Also, it is well known that Shallow Lake offers possible the best duck hunting in the whole refuge. To take this area away from hunters is just unacceptable. Having spent many hours on the refuge, I can tell you that open brake is heavily used by waterfowl and has never in my experience been even close to 100% capacity. The birds will sit all morning undisturbed until 12, at which time bird can daily be seen filtering to the rest of the refuge. If anything I've seen an increase of birds in the refuge over the

past five years, which to me indicates no need in sanctuary relocation. All the report stated was that there was a need for relocating the current sanctuary, but no actual data saying why and how the small current sanctuary is effecting waterfowl behavior. There is no data saying how much the new sanctuary will increase the overall waterfowl population or how it will decrease harvest numbers. Or even how much it will increase waterfowl stability in the area. There is no habitat like shallow lake in the rest of the refuge, maybe similar, but not the same. A viable option would be to bring the current sanctuary further south bordering the East side of shallow lake but not extending very far west, while also extending to the east side of the river into the west side of Redeye. Third, the GTR flood plan should be kept at natural flooding with an every third year option of artificial flooding if natural flooding is not occurring. Keeping tree health optimal should be high priority while also compromising to provide habitat for hunters and waterfowl. As one can see, I don't agree with either of the two alternative plans but I'am willing to compromise for some changes. The mission for the refuge systems is to provide habitat for wildlife while also providing recreation for people. Hunting and fishing is by far the biggest attraction the refuge provides and to get away from this point of emphasis is just a mistake. Keep access and available hunting and fishing ground a top priority. Once the refuge and WMA system begins to fail for hunters and fisherman, it will only be a matter of time before it will disappear.
Thank you,

Dear Ms. Chouinard:

Attached are our comments on the Draft Habitat Management Plan/Environmental Assessment for Felsenthal National Wildlife Refuge. Please feel free to contact me if you have questions or problems with the file.

Sincerely,

Date: December 8, 2015

Subject: Draft Habitat Management Plan and Environmental Assessment

Felsenthal National Wildlife Refuge

ANHC No.: F-FWS.-15-015

Ms. Tina Chouinard, Natural Resource Planner

U.S. Fish and Wildlife Service

49 Plainsbrook Place

Jackson, TN 38305

Dear Ms. Chouinard:

Staff members of the Arkansas Natural Heritage Commission have reviewed the Draft Habitat Management Plan/Environmental Assessment (HMP/EA) for Felsenthal National Wildlife Refuge. The purpose of the HMP/EA is to refine/revise management objectives and strategies for the refuge. The plan will guide habitat management over the next 15 years. The document presents three alternatives and identifies "Alternative B" as the preferred alternative.

We have the following comments/concerns about Alternative B:

We are disappointed that the number of acres of open pine habitat (referred to as Upland Pine in the plan) that would be managed for under the proposed alternative in the Felsenthal NWR proposed habitat management plan is so significantly, dramatically less than the current management standard.

The Open Pine Decision Support Model frequently referenced in the plan has been shown to have a deficiency in the secondary floodplain of the Deweyville Terrace and should not be used for

planning in those areas. The open pine habitat proposed for removal from management on the Felsenthal NWR is in the secondary floodplain of the Deweyville Terrace. Thus, sources other than the Open Pine Decision Support Model should be used to support any proposed changes to open pine habitat at Felsenthal NWR.

A better map should be provided that more clearly identifies which tracts are being proposed for removal from open pine management.

It would be good to have a meeting with partners to help strategically identify which tracts would be suitable to consider removal from open pine habitat management. For example, there is a contiguous area of open pine habitat in the very northern portion of the refuge that could make a strong contribution as a stepping stone between the open pine habitat in the eastern portion of the refuge and Longview Saline Natural Area to the north. The Arkansas Natural Area Heritage Commission, The Nature Conservancy Field Office of Arkansas, and other partners are currently developing a stepping stone corridor that facilitates the rescue effect of species of open pine and other habitats that stretches from the Louisiana border to the Ouachita Mountains National Forest.

We understand budget constraints can play a role in management objectives. We would be interested in helping develop a partnership that would work to offset budget shortfalls and help in the management of open pine habitat at Felsenthal in a way that would fit into the landscape goals of the collective agencies.

We support the continued management of rare grassland types (saline barrens and lowland sand prairies) at Felsenthal NWR. These habitats are known to support a number of species of conservation concern. In addition to the ones referenced in the HMP/EA, we are aware of a complex of open grasslands centered on 33.21708°, - 92.07357°, in the northeastern part of the Refuge. This area has not been visited by ANHC staff but is clearly visible in aerial photos. It is mapped as part of a larger area of Guyton soils, not a soil type known to support either saline barrens (which typically occur on Lefe soils in the area) or lowland sand prairie (typically on Crevasse soils). It is possible that this area represents an unmapped area of one of these soils/community types or it may be a different type of grassland altogether. Either way, it is clearly a natural grassland and may support species of conservation concern. The opportunity to comment is appreciated.

Sincerely,

Attached are my comments.

Michael Stroegh
US Fish and Wildlife Service
Address

December 5, 2015

Dear Michael,

This letter represents my comments regarding the recently released Habitat Management Plan for Felsenthal National Wildlife Refuge. I appreciate the time and effort you and your staff put into developing the HMP and realize that creating a plan that balances the conservation of the refuge's natural resources while considering the wants and preferences of outdoors enthusiasts and local businesses is a difficult task.

The HMP focuses on Alternatives A, B, and C. As I read through the HMP, each alternative had its strengths and weaknesses compared to objectives found in other alternatives. So, these comments will not reflect a preference for a specific alternative, but will instead focus on what I believe are preferred practices that will strike a balance between managing the habitat and allowing for recreational uses such as hunting, fishing and wildlife observation.

GENERAL COMMENTS

The refuge has often been the target of criticism regarding the management of the property. It's my belief that overall, the refuge does a good job of managing the resource, but there have been occasions where adjustments and better communication efforts would make a big difference in how the public perceives the refuge's management activities.

A couple of examples:

- Prescribed burning during the growing season is often criticized by turkey hunters. I would encourage the refuge staff to increase communication and educational efforts so turkey (and quail) hunters understand the benefits of burning for habitat improvement – perhaps working with local National Wild Turkey Federation members to increase support of these activities.
- In recent years, flooding regimes have been altered affecting the ability of hunters in Bradley County to pursue waterfowl. Reducing artificial flooding lowers the rate of tree mortality, but I have never seen a concerted effort to present, explain, and make the local users understand the impact of annual flooding. A well-planned and executed communications plan would bolster the refuge's position and deflect much of the criticism. Groups like the Friends of Felsenthal and Ducks Unlimited could add outside credibility to the refuge's communication efforts.

FLOODING REGIME

Alternative B eliminates artificial flooding from the toolkit of the refuge. Though I understand that the overuse of artificial flooding damages the bottomland forests on the refuge, the prudent use of flooding may be acceptable in the future as way to increase or improve habitat, control undesirable species or meet other objectives. Once artificial flooding is purged from the refuge's management options, it will be difficult to bring it back. In addition, elimination of artificial flooding may encourage riparian landowners above the refuge to develop properties along the river's edge.

Recommendation

I would recommend that the refuge keep the periodic use of artificial flooding in their options for water level management – a practice that can be utilized at their discretion to meet specific habitat goals.

64' POOL

I agree with the concept of dropping the Felsenthal Pool to 64 feet on an annual or periodic basis. The drawdown will create favorable conditions for moist soil habitat and help control noxious and excess aquatic vegetation. The practice should increase the waterfowl carrying capacity of the refuge. Prior to adopting the practice, there are some concerns that should be discussed and addressed.

In the section titled "Impacts on Public Use and Access," the HMP discusses the limitations and restrictions related to launching boats and accessing sections of the refuge. I believe the HMP underestimates the economic and social impacts. If "several boat launches" are unusable, I have to assume that only deep water launches would be available (e.g., Crossett Harbor, COE ramp in Felsenthal), and that many, if not all of the shallow water launch sites would be inoperable.

Boater access to many parts of the refuge may be eliminated or limited during the drawdown. The canals and cuts from the boat launches and from the rivers into lakes and brakes will likely be too shallow to boat through during the drawdown. Several of these canals are already access-limited when the river is at normal summer pool (65') due to erosion and sedimentation.

Recommendation

The FWS should take access into consideration. Extending shallow water boat ramps and dredging the cuts and canals on a periodic basis should be completed in conjunction with the drawdowns.

RELOCATING THE SANCTUARY

Value of Sanctuaries

According to the FWS recent publication "Waterfowl Population Status, 2015," duck numbers are 43 percent above the long-term average. Mallard, blue-wing teal, green-wing teal and northern shoveler populations – which, along with wood ducks, make up the majority of duck species on the refuge - are all significantly above the long-term average. I was disappointed that the HMP, on page 190, reported that "...continental populations of waterfowl (are in) decline..." as one of the motives for moving the sanctuary.

There have been several studies that indicate that the greatest influence on waterfowl populations is the quality of breeding habitat. The number of sanctuary acres in the Mississippi Flyway is almost insignificant compared to the number of total acres in wetland habitat. Though the practice of creating sanctuary for waterfowl is commendable, when considering current high waterfowl populations and the consensus that breeding habitat quality is what drives waterfowl populations, one has to wonder if the practice of creating sanctuaries is meaningful in conserving duck populations.

Recommendation

I believe that FNWR should instead focus on habitat quality. The drawdown to 64' is an important step. The HMP describes the positive habitat effects that the drawdown will have on moist soil species. Improvements in overall habitat quality across the entire refuge will have a greater impact on waterfowl than moving the sanctuary.

Paddling Trail Conflicts

Through the spring and summer of 2015, the Friends of Felsenthal worked closely with the AR Game & Fish Commission and FNWR to establish two paddling trails. The Deep Slough-to-Shallow Lake trail traverses the proposed waterfowl sanctuary. If the refuge had informed the Friends group about the potential sanctuary, it is likely the group would have relocated the paddling trail. Establishing the trail included writing a "Compatibility Study" outlining potential conflicts of creating the trail. The location of the trail was well known to staff at Felsenthal, but the potential of a waterfowl sanctuary affecting the trail was never discussed by the FNWR staff and the Friends group. FNWR staff allowed the Friends group to

put up trail markers, erect kiosks and even have a “Grand Opening” event – all without word that FNWR planned to have the trail closed several months per year – during potentially the best times to float the trail.

Closing the paddling trail while the sanctuary is in effect could greatly increase the amount of time the paddling trail is unusable to floaters because when the water level is brought down to 64', Deep Slough will likely be too shallow to navigate. In other words, from the time water levels drop (July 1) until water levels rise (October 1st) the paddling trail will be unusable. Soon afterward, the sanctuary area will be closed, eliminating the paddling trail until (April??) // water level increase to 65', waterfowl season will start and the paddling trail will again be unavailable.

At best, the staff at FNWR has been negligent, and at worst dishonest to not inform the Friends group about the potential of moving the sanctuary, thus closing the paddling trail for several months annually. The mission of the Friends group is to provide voluntary assistance to the Refuge. Allowing the Friends to complete a significant project like the paddling trails, and then just a month later proposing a practice that has a significant negative impact on that very project will likely damage the trust needed to be an effective advocate for the refuge.

Recommendation

I believe that FNWR should not close the paddling trail while the sanctuary closure is in effect. Keeping the paddling trail open will have several outcomes for FNWR to consider:

- Paddling is a low impact activity that will have a limited affect on waterfowl.
- During duck season, a paddling trail through the sanctuary will be one of the few water-related activities on the refuge that will not conflict with duck hunters. Non-consumptive users of the refuge will have a new opportunity to utilize the refuge for birding and nature study.
- The paddling trail follows the open-water sections of Fishtrap Lake and Shallow Lake. These deep, open water areas are not considered good waterfowl habitat, so the potential impact on waterfowl would be minimal. For trail users, the route is an excellent opportunity for viewing migrant birds and furbearers.

TO: Tina Chouinard

Here are my comments on the subject document:

I prefer and highly recommend Alternative **C with the following *modifications*:**

(1) Allow management discretion in determining how much to raise the water levels each year but with a MINIMUM raise to 66' MSL and a MAXIMUM raise to 68' MSL beginning December 15th. Begin a 1/10 foot per day drawdown of the navigation pool level of 65' MSL to 64' MSL beginning January 16th. As stated in the document for Alternative C, conduct the one-foot drawdown *every year* (as was done in 1995 in coordination with the U. S. Army Corps of Engineers). The annual drawdown should have little or no adverse impact on the limited amount of navigation that occurs on the Ouachita River *above* the Felsenthal Lock and Dam.

I STRONGLY OBJECT to the proposed Alternative B regarding GTR management which, as stated, precludes ANY intentional flooding of the GTR **FOREVER!** What a shame it would be not to utilize a 30-million dollar water control structure that's been in place since 1985 (the Felsenthal Lock and Dam).

(2) Regarding control of non-native and other pest animals, I offer the following comments: I may have overlooked it but I saw NO MENTION of allowing the PUBLIC to assist in the control of exotic and/or noxious animals, especially *feral swine*. On pages 60 and 164, the following statement occurs – “Methods for feral swine control/eradication include *trapping and shooting by Service employees.*” In spite of some research that suggests that public hunting ALONE cannot control feral swine populations, it is a travesty not to allow the public to ASSIST in their control, especially during these times of shrinking budgets and personnel cutbacks that resource management agencies are facing. As for the argument that public hunting of these animals “creates value” which in turn promotes the release of feral hogs, THAT'S SIMPLY NOT TRUE ON FELSENTHAL. I'm aware that it might be a problem on SOME Wildlife Management Areas in the Southeast BUT NOT ON FELSENTHAL. The other argument I hear is that public hunting tends to DISPERSE feral hogs thereby making them more difficult to trap and/or shoot by agency personnel . . . Again, that may be *partially* true but the benefits of allowing public hunting (e.g., reducing the population and providing recreational value) FAR OUTWEIGH the dispersal concern.

Therefore, please consider allowing the INCIDENTAL taking of all non-native and other pest animals by the public during any daytime refuge hunt (without the use of dogs) with weapons and ammunition legal for that hunt. That has been the policy on Felsenthal NWR since at least 1982.

By the way, I saw no mention of COYOTES in this section of the document . . . yet they are included in the Public Use Regulations (hunt brochure) as an incidental species that may be harvested . . . Again, I may have overlooked it.

My compliments to the U. S. Fish & Wildlife Service for the extraordinary amount of effort expended in producing a very well written (albeit somewhat “cumbersome”) document and for allowing for public input . . . *Now let's see what comes of it!*

Tina,

Please change the second sentence in the first paragraph below (highlighted in yellow) to read as follows: **Begin a 1/10 foot per day drawdown of the GTR beginning January 16th until the navigation pool level of 65' MSL is reached.**

Thank you.

TO: Tina Chouinard

Here are my comments on the subject document:

I prefer and highly recommend Alternative **C** with the following *modifications*:

(1) Allow management discretion in determining how much to raise the water levels each year but with a MINIMUM raise to 66' MSL and a MAXIMUM raise to 68' MSL beginning December 15th. **Begin a 1/10 foot per day drawdown of the navigation pool level of 65' MSL to 64' MSL beginning January 16th.** As stated in the document for Alternative C, conduct the one-foot drawdown *every year* (as was done in 1995 in coordination with the U. S. Army Corps of Engineers). The annual drawdown should have little or no adverse impact on the limited amount of navigation that occurs on the Ouachita River *above* the Felsenthal Lock and Dam.

I STRONGLY OBJECT to the proposed Alternative B regarding GTR management which, as stated, precludes ANY intentional flooding of the GTR *FOREVER!* What a shame it would be not to utilize a 30-million dollar water control structure that's been in place since 1985 (the Felsenthal Lock and Dam).

(2) Regarding control of non-native and other pest animals, I offer the following comments: I may have overlooked it but I saw NO MENTION of allowing the PUBLIC to assist in the control of exotic and/or noxious animals, especially *feral swine*. On pages 60 and 164, the following statement occurs – “Methods for feral swine control/eradication include *trapping and shooting by Service employees.*” In spite of some research that suggests that public hunting ALONE cannot control feral swine populations, it is a travesty not to allow the public to ASSIST in their control, especially during these times of shrinking budgets and personnel cutbacks that resource management agencies are facing. As for the argument that public hunting of these animals “creates value” which in turn promotes the release of feral hogs, THAT'S SIMPLY NOT TRUE ON FELSENTHAL. I'm aware that it might be a problem on SOME Wildlife Management Areas in the Southeast BUT NOT ON FELSENTHAL. The other argument I hear is that public hunting tends to DISPERSE feral hogs thereby making them more difficult to trap and/or shoot by agency personnel . . . Again, that may be *partially* true but the benefits of allowing public hunting (e.g., reducing the population and providing recreational value) FAR OUTWEIGH the dispersal concern.

Therefore, please consider allowing the INCIDENTAL taking of all non-native and other pest animals by the public during any daytime refuge hunt (without the use of dogs) with weapons and ammunition legal for that hunt. That has been the policy on Felsenthal NWR since at least 1982.

By the way, I saw no mention of COYOTES in this section of the document . . . yet they are included in the Public Use Regulations (hunt brochure) as an incidental species that may be harvested . . . Again, I may have overlooked it.

My compliments to the U. S. Fish & Wildlife Service for the extraordinary amount of effort expended in producing a very well written (albeit somewhat “cumbersome”) document and for allowing for public input . . . *Now let’s see what comes of it!*

TO: Tina Chouinard
Felsenthal National Wildlife Refuge
5531 Highway 82 West
Crossett, AR 71635

Here are my individual comments on the subject document:

1. I prefer and highly recommend Alternative C with the following modifications:

Allow management discretion in determining how much to raise the water levels each year but at a MINIMUM, raise to 66’ MSL beginning no later than December 15th, and begin a 1/10 foot per day drawdown of the Green Tree Reservoir (GTR) beginning January 16th until the navigation pool level of 65’ MSL is reached.

I understand the health of the green timber in the GTR has suffered in recent years due to naturally occurring high water conditions, however, with proper management practices the health of the green timber may recover. When the health of the green timber has recovered, then common sense should dictate that the GTR be managed to maximize the benefit to migratory waterfowl, which was one of the original purposes for the refuge that justified the large expenditure of public funds. Refuge management, with the advice of professional foresters, should have the discretion to raise the level up to 70’ MSL, for as long a period as possible, to benefit migratory waterfowl (again assuming the green timber is deemed healthy by professional foresters).

As stated in the document for Alternative C, conduct the one-foot drawdown every year (as was done in 1995 in coordination with the U. S. Army Corps of Engineers). The annual drawdown should have little or no adverse impact on the limited amount of navigation that occurs on the Ouachita River above the Felsenthal Lock and Dam.

2. I STRONGLY OBJECT to the proposed Alternative B regarding GTR management which, as stated, precludes ANY intentional flooding of the GTR FOREVER! What a shame it would be not to utilize a 30-million dollar water control structure that has been in place since 1985 (the Felsenthal Lock and Dam). It makes no sense to arbitrarily ban raising the water level in the future, and thereby waste the expenditure of public funds spent on improving the refuge, deprive the public from a major benefit of using the refuge, and deliberately not benefit the migratory waterfowl that was a primary purpose of the refuge.

3. Regarding control of non-native and other pest animals, I offer the following comments: the PUBLIC should be allowed to assist in the control of exotic and/or noxious animals, especially feral swine. On pages 60 and 164, the following statement occurs – “Methods for feral swine control/eradication include trapping and shooting by Service employees.” In spite of research that suggests that public hunting ALONE cannot control feral swine populations, it is a travesty not to allow the public to ASSIST in their control, especially during these times of shrinking budgets and personnel cutbacks that resource management agencies are facing. As for the argument that public hunting of these animals “creates value” which in turn promotes the release of feral hogs, this is a red herring as there are laws that prohibit the release of feral swine, and there is no evidence this lawbreaking activity is occurring on the refuge. Another argument is that public hunting tends to disperse feral swine, making them more difficult to trap and/or shoot by refuge personnel. While that may be partially true, the benefits of allowing public hunting that provides recreational value for the public, and important economic

benefit for the region, as well as assisting in reducing the population, FAR OUTWEIGH the dispersal concern.

Please consider continuing to allow the taking of all non-native and other pest animals by the public during any daytime refuge hunt (without the use of dogs) with weapons and ammunition legal for that hunt. This has been the policy on Felsenthal NWR since at least 1982, and should be continued.

Coyotes should also be included as an incidental species that may be harvested.

Thank you for your consideration of these comments!

I am a native of Union County and have hunted and fished in Felsenthal all my life. I am against closing roads in the refuge for a couple of reasons. 1) Many areas are only accessible by such trails. The roads/trails provide opportunity's for older adults, physically challenged and children access to the outer reaches of the refuge. 2) The refuge is for both the people and the animals. If we continue to reduce the opportunities for the public to utilize the resource, why have it? I understand from the public forum that supposedly the concern is for water quality. However typical boat traffic will create for more sediment issues than a few points on the river where trails would feed into the stream. Thanks and I would love to talk to you more about this!

Thanks and have a great day!

Tina,

Please see the attached letter containing the Arkansas Game and Fish Commission Fisheries Division's comments on the proposed Felsenthal NWR Habitat Management Plan. If you have any questions or need anything else, please let me know. Thank you for the opportunity to comment on this plan.

December 18, 2015

Michael Stroeh, Project Leader
South Arkansas Complex, U.S. Fish and Wildlife Service:

Thank you for the opportunity to review and comment on the draft Habitat Management Plan and Environmental Assessment for Felsenthal National Wildlife Refuge. By way of this letter, I offer support of the Arkansas Game and Fish Commission's (AGFC) Wildlife Division for the preferred alternative management strategy (proposed Alternative B).

We agree with the preferred alternative to not purposefully/artificially flood the greentree reservoir. As stated in the plan and letter to states, Felsenthal staff has the most extensive data available on the effects of annual flooding over multiple decades, and these data clearly indicate detrimental impacts to forest health and species composition. Management actions that seek to provide habitat annually as habitat degradation continues may be viewed as necessary to comply with the

enabling legislation for Felsenthal, but much more likely reduce long-term, cumulative benefits while providing only questionable short-term benefits.

We are supportive of the preferred alternative to change the waterfowl sanctuary location, and would suggest clarifying that refuge staff will not be providing rotating sanctuary. However, at the summer pool level (65' ms!), over 3,000 acres of the current waterfowl sanctuary are flooded. It's not clear at what elevation the proposed new sanctuary would be flooded. If more land that will be flooded at 65' ms! is added to the sanctuary to ensure "quality waterfowl habitat" is provided, the goal may not be achieved. Lands flooded most of the year may not provide quality waterfowl habitat. Also, documents should clarify that the former sanctuary areas will be open for migratory bird hunting; migratory bird hunting wasn't listed as a future activity on past-sanctuary lands in the objectives table but was mentioned in the letter to states.

The proposal to purposefully draw down the pool one foot once every three years should provide a great opportunity for abundant waterfowl food production. Implementing this management action every year should provide increased waterfowl food resources in more years, and would help reduce deficits in energy available for waterfowl. We would recommend adding a provision to the proposed plan to adjust the timing of the one foot drawdown of the Felsenthal pool if natural flooding prevented the desired results during the scheduled year of the drawdown.

We support the preferred alternative to reduce ATV trails on the Refuge. The completed GIS study which shows that 52% of the refuge is within 0.5 mile of existing roads or waterways and 91% is within one mile of roads or waterways indicates that the proposed open road/ waterways system, mobility-impaired concessions and retained ATV trails will provide adequate public access.

We do not believe any of the alternatives would be beneficial to federally listed aquatic species. The amount of sediment that is accumulating in the Saline River (and likely in the Ouachita River) from upstream sources seems to be an issue. To benefit the federally listed aquatic species on the refuge, the U.S. Army Corps of Engineers needs to allow the river to free flow except when navigation is needed, which is very rare. This would also benefit riverine species downstream of the dam by reducing lateral scour on the banks and provide greater stability to the downstream habitat.

Finally, we would like the refuge to continue active management within a significant portion of the current 2,800 acre open pine habitat that does not directly benefit red-cockaded woodpeckers since other high priority bird species require this specific habitat type. We understand that budgets and manpower

can constrain habitat work, but we recommend working to develop a multi-agency, multi-organization partnership to offset budget or manpower shortfalls to manage open pine habitat on the refuge that would mesh with the landscape goals of the collective agencies and organizations and meet species' needs. The Arkansas Natural Heritage Commission, The Nature Conservancy Field Office of Arkansas, and other partners are currently developing a stepping stone corridor that facilitates the rescue effect of species of open pine and other habitats that stretches from the Louisiana border to the Ouachita National Forest. It may be useful for USFWS and refuge personnel to meet with partners to help strategically identify tracts that should continue to be actively managed and those that could be removed from the active management program.

Again, thank you again for the opportunity to review and comment, and as always, we value our working partnership.

Sincerely,

Tina,

Please see the attached letter containing the Arkansas Game and Fish Commission Fisheries Division's comments on the proposed Felsenthal NWR Habitat Management Plan. If you have any questions or need anything else, please let me know. Thank you for the opportunity to comment on this plan.

To Whom It May Concern,

After reviewing the proposed Habitat Management Plan for Felsenthal National Wildlife Refuge, the Arkansas Game and Fish Commission (AGFC) submits the following comments relative to elements of the plan that may affect fisheries or other aquatic resources.

Objective 5 of Alternative C prescribes a one foot drawdown of the pool every year. Drawing the water level down concentrates the entire fish community in a smaller area, allowing piscivorous fish to prey heavily on forage species and young of the year of all fish species. This will not only result in a major reduction of the overall forage base, but will also have a major impact on the recruitment of many species in the system. This heavy predation, combined with low recruitment occurring every year will cause an overall reduction in

the productivity of the fishery. Periodic drawdowns can be beneficial to some fish populations by allowing the predators to forage more efficiently, but this should not be done more than once every five years to avoid consecutive missing year-classes. Given these factors, we are adamantly opposed to Alternative C, and would like the USFWS to reconsider the periodicity of drawdowns in Alternative B.

The Habitat Management Plan specifically mentions managing for Alligator Gar, but there is very little mention of management activities for their benefit. One of the major obstacles regarding Alligator Gar management throughout their range is the loss of the natural floodplain habitat required for successful spawning and recruitment. Given the anthropogenic alterations to the Ouachita River system and the effects of climate change, which affect duration and magnitude of high water events, artificial flooding (elevating the refuge pool to at least 68') during March-June once every 5 years is needed if a natural flooding event has not occurred naturally during this period. Not only will this provide the additional floodplain habitat necessary for the successful spawning and recruitment of Alligator Gar, but these elevated spring water levels will also help produce strong year classes for other species, such as crappie and bass. This floodplain habitat will provide nursery habitat for newly spawned fish of many species. Elevated spring water levels associated with Alligator Gar management may also help inhibit the growth of nuisance aquatic macrophytes in many areas of the refuge. The deeper water will prevent the necessary sunlight penetration, preventing establishment of vegetation such as American Lotus, which is a major problem in many areas of the refuge.

Finally, there was no specific information regarding the rate of lowering the pool water level during spring and summer high water events to return the reservoir to normal pool. During creel surveys conducted by Arkansas Game and Fish Commission staff at the Refuge, many anglers have reported major water level reductions during their fishing trips and have even reported seeing fish stranded on the large mudflats present in the refuge. AGFC staff members have also personally observed significant reductions in refuge pool levels during the course of a creel survey (6 hour shift). As previously mentioned, the floodplain habitat created by elevated water levels is being used heavily during these spring and early summer flood events by multiple fish species and they can easily be stranded by a significant daily reduction in pool level. Rapid drops in water level during spawning periods can also be disruptive to spawning fish, whereas a slow fall allows fish to adjust their spawning behavior. A prescription for daily maximum reductions of pool levels below 70 ft msl should be included in any Felsenthal habitat management plan.

We appreciate the opportunity to provide comments regarding the Habitat Management Plan, your longstanding partnership with AGFC, and your dedicated efforts to manage and conserve the natural resources of the Felsenthal Basin.

Dear Ms Chouinard,

First, I would like to thank you for your time and allowing those of us who love Felsenthal to address you regarding the proposed plans for the refuge. As a lifelong resident of South Arkansas, Felsenthal has a very special place in my of heart. As an outdoors woman, I see Alternate C as the most appropriate choice for the concerns of the refuge and the residents of the area.

First, alternative C would allow a more ideal environment for ducks as well as the RBW. Isn't that one of the greatest principals behind a "refuge"? We don't attract near the number of ducks to our area as we have in previous years. We can't control the weather, but we can provide an area to attract them.

Second, the limiting of ATV trails is understandable but they shouldn't be eliminated all together. Alternate C would be a balance of this. How would a hunter not physically able to walk into the refuge, enjoy it if you eliminate the ATV trails. Is that being fair to our disabled sportsmen?

Third, I have read that some of the concern behind these proposals is to save timber. I have a hard time buying into this. The naturally occurring timber is there and thrives due to the God given mechanism of survival, not because of anything we as humans are doing. Some of those trees have been there hundreds of years and have survived despite human efforts. Those trees are native to the area, more than any human resident, and will be there when most of us are gone.

Again, thank you for your time and consideration to choosing alternative C. Please remember in your careful decision making, we residents of the area will be the ones to live with your choice, as will our families for generations to come.

Please feel free to contact me

Sincerely,

Comment:

Just a comment and request.

I have a camp in the Town of Felseenthal

I watch lots of Boats go to the Lake every

Summer. Please include the fishing considerations

in your plans.

Thanks

Robert P.

The following Petition was received by the Service with 644 signatures.

French

December 3, 2015

48 pages

Michael Stroeh
Project Leader
Felsenthal National Wildlife Refuge
5531 Hwy 82 West
Crossett, AR 71635

Dear Mr. Stroeh,

We the people of the Concerned Citizens for Preservation and Conservation of Felsenthal, over the course of the last several weeks, have met and reviewed all of the components of the Proposed Habitat Management Plan for Felsenthal National Wildlife Refuge and would like to petition that our requests and concerns from the attached Alternative C Revision Sheet be taken into consideration upon the final revisions to the new management plan.

As we are all aware, for the past 40 years, Felsenthal National Wildlife Refuge has been a great asset to the citizens of southeast Arkansas as a refuge for many migratory waterfowl and birds, a recreational and educational gem, and a cultural resource to the good tax paying citizens of Bradley, Ashley, and Union counties. Its use for hunting and fishing, wildlife observation, and environmental education are key assets that must be preserved through working with the refuge to assure good and practical management practices and by using sustainable methods to achieve refuge goals.

Upon reviewing the objectives and alternatives provided in the plan, our group would like to focus primarily on wintering waterfowl and the ATV trails within the refuge. The water levels are a significant concern for those of us that enjoy duck hunting. Wintering waterfowl was one of the main reasons that the refuge was formed. When flooding does not occur, the local economy experiences lost revenue as hunters drop out. We feel our GTR Management request is very conservative and will not damage the timber. We also feel strongly that the refuge should leave the ATV trails in place as many of our elderly and disabled citizens would not have sufficient access to the refuge without the ability to use these trails with their ATV's. This includes our disabled veterans as well, many of whom find that using the refuge for hunting and other recreational activities is therapeutic. After many discussions, our group feels that a slight revision of alternative C would prove most beneficial to the conservation efforts while also being the fairest and least obstructive to the hunting of waterfowl, access to the reserve and the preservation of timber.

Please review the attached Alternative C revision sheet for further details on our request along with notes pertaining to past practices on the reserve. We look forward to working with

OBJECTIVES	ALTERNATIVE C	ALTERNATIVE C w/ REVISED REQUEST AND NOTES
OBJECTIVE 1 UPLAND PINE (OPEN PINE)		
Acres		No Revision Requested
Fire Managed Acres	8,159	
Uneven-aged Managed	8,159	
RCW Cluster (population objective)	500 acres	No Revision Requested
Consider Neighboring Population of RCWs	18	
Open Fields	YES	No Revision Requested
	132 Acres	No Revision Requested
OBJECTIVE 2 UPLAND HARDWOOD/PINE		
Acres	1,219 acres	No Revision Requested
OBJECTIVE 3 BOTTOMLAND HARDWOODS		
Acres	40,000 acres	No Revision Requested
Passively Managed Acres (an effort will continue to control invasive species)	5,551 acres plus all lands between 65' and 67' msl	No Revision Requested
OBJECTIVE 4 WATER MANAGEMENT/SANCTUARIES		
GTR Management	*Please See Request	Starting November 30th, raise the pool 1.5" per day until the 68' msl is reached. Hold for 15 days and start the drawdown at one tenth every other day until 65 msl is reached. Notes (In the past, Entergy has assisted with the lakes to drawdown and achieve sufficient flow. We feel this water regime is very conservative and based on studies from the USF&W.
Sanctuary	9,050 acres	No Revision Requested
OBJECTIVE 5 DRAWDOWN OF THE FELSENTHAL POOL/MOIST SOIL		
Drawdown	1 foot drawdown every year.	No Revision Requested
OBJECTIVE 6 AQUATIC RESOURCES		
Water Quality Monitoring and Mussel Bed Survey	Yes	No Revision Requested
ATV Trails	*Please See Request	Request that no more than 5.8 miles of trails be eliminated. Notes: Trails are vital for accessibility for the elderly and disabled, including our disabled veterans. We must keep the trails open for the enjoyment of all of our citizens.