

RE: Comments on Proposed Rule for Maintaining Biological Integrity, Diversity, and Environmental Health of the National Wildlife Refuge System

As representatives of waterfowl hunters of California, Nevada, Utah and Oregon, we would like to take this opportunity to provide comments on the U.S. Fish and Wildlife Service's proposed rule for maintaining biological integrity, diversity, and environmental health (BIDEH) of the National Wildlife Refuge System.

Water Rights Acquisition: We strongly support the inclusion of water rights acquisition from willing sellers in order to sustain managed wetlands and other aquatic habitats. This is especially needed at the Lower Klamath and Tule Lake National Wildlife Refuges, where obtaining annual water deliveries has become increasingly difficult since 2001 with corresponding negative impacts to waterfowl and other wetland-dependent wildlife. Securing permanent water rights for refuges would not only increase the amount of flooded habitats and properly conserve waterfowl populations, but allow refuge managers to better plan and optimize their wetland management activities. We would also note that a water rights acquisition strategy previously helped secure a more reliable supply of water for wetlands at Stillwater National Wildlife Refuge in Nevada.

Farming: We disagree with the general prohibition on agricultural practices unless certain conditions are met. This policy unnecessarily ties refuge managers' hands and fails to recognize the strong connection between cereal grain farming (e.g. rice, wheat, barley, corn) and waterfowl conservation. While the proposed rule's intent to "achieve refuge management objectives through natural processes" is admirable, it fails to recognize the historic loss of wetlands and other food resources for waterfowl, especially in California where wetland habitat has declined by over 90%. Without agriculture, which provides up to 50% of the food resources available to waterfowl, it would be impossible to sustain the populations of migratory birds that we enjoy today. Also note that in California summer flooded rice fields provide important brood and molting areas for local duck species like mallards, cinnamon teal and gadwall.

We also have concerns about the ban on genetically engineered organisms and the potential impact to farming practices that support waterfowl and other wildlife. Since all modern cereal grain crops have been genetically modified using both field and lab practices, agriculture should continue to deploy those seed strains for increased yields and enhanced resistance to pests and diseases. In other words, the use of genetically modified seed strains on Refuges should be encouraged, as they will likely provide greater food resources for wildlife.

We would also note that farming on the Klamath Refuges consistent with waterfowl management purposes is already authorized in law by the Kuchel Act, and must therefore not be impacted by the proposed rule.

Predator Control: We also disagree with the general prohibition on native predator control unless it is determined a necessary last resort. With minor exceptions, natural processes and the existence of pristine habitats on Refuges are all but non-existent, or at the very least heavily impacted by outside forces. In light of this, there has been an unnatural increase in certain predators. Populations of Arctic fox and their increased survival through the exploitation of augmented marine mammal carcasses and the wide scale increases of raven population and distribution due to increased access to sanitation facilities are but two examples.

Waterfowl and other ground-nesting birds are particularly vulnerable to predation by skunks, opossums, raccoons and foxes, and studies have shown that targeted predator control can be effective in achieving wildlife management goals. The Refuge manager should retain the ability using his or her professional discretion to reduce predator populations or take individual animals, when needed.

Thank you for the opportunity to comment.

Sincerely,

John Carlson Jr., President
California Waterfowl
jcarlson@calwaterfowl.org

William Molini
Nevada Waterfowl Association
williammoliini@gmail.com

Graig Spolek, President Emeritus
Oregon Duck Hunters Association
spolekg@pdx.edu

Jeff Richards
Utah Waterfowl Association
cj5jeffutah@yahoo.com