

## **APPENDIX O.    Response to Comments**

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JAMES S. HOLT, Ph.D.  
SENIOR ECONOMIST

September 20, 2004

Project Leader  
Ridgefield National Wildlife Refuge Complex  
P.O. Box 457  
Ridgefield, Washington 98642

**RE: Comments on the Draft Comprehensive Conservation Plan  
for the Gorges Refuges**

Ladies and Gentlemen:

This letter contains comments of the American Kennel Club (AKC) on the above referenced draft Comprehensive Conservation Plan (CCP) noticed in the *Federal Register*, Vol. 69, No. 161 on August 20, 2004.

The American Kennel Club, Inc. was established in 1884 and is a not-for-profit corporation chartered by the New York State legislature by Act of May 18, 1908. The AKC is the world's largest purebred dog registry and sanctioning body for canine competitive and performance events. The AKC's mission is to:

- Maintain a registry for purebred dogs and preserve its integrity;
- Sanction dog events that promote interest in, and sustain the process of, breeding for type and function of purebred dogs;
- Take whatever actions necessary to protect and assure the continuation of the sport of purebred dogs.

**Statement of Interest**

The AKC does not have individual members, but rather represents more than 4000 local clubs of dog fanciers throughout the United States, including more than 100 dog clubs in the State of Washington, which are members of the AKC and/or are affiliated with the AKC and hold events under AKC rules. These include not only conformation and obedience training clubs, but clubs conducting field trials and other

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sporting activities involving the use of dogs. Many members of AKC's clubs are persons who use and enjoy the Gorges Refuges for wildlife dependent uses, including wildlife observation with their dogs, hunting, and other activities in the field involving dogs. The AKC provides these comments on behalf of the members of our member and affiliated clubs in Washington, Oregon and elsewhere who are actual and potential users of the Gorges Refuges.

**Access to the Gorges Refuges for People Accompanied By Dogs**

We note that the Gorges Refuges are not now officially open to the public. However, the CCP notes that the Dike Trail is, in fact, used by the public for a variety of purposes, including hiking, horseback riding, jogging and bicycling. Members of the public using the trail are often accompanied by their dogs. In its recommended plan for the refuges, designated Alternative B, the refuge managers plan to acknowledge and sanction these current uses, including access to users accompanied by their dogs, and to adopt the trail and develop policies to accommodate these activities. The AKC strongly endorses this sensible policy.

Only a very small portion of the refuge would be affected by officially opening the Dike Trail to the public. We note that the draft CCP contains no data or evidence that the activities which would be officially sanctioned, which have been occurring without official sanction for some time, have had a detrimental impact on wildlife in the refuge. We also note that wildlife refuges were not established solely for the protection of wildlife, but also to provide opportunities for the public to engage in wildlife dependent uses. The limited official access to the refuge recommended in Alternative B furthers this statutory purpose.

Refuge planning inevitably involves compromises among the variety of objectives set forth in the National Wildlife Refuge System Improvement Act of 1997. One of the purposes of the CCP process provided for in the Act is to develop a rational plan for accommodating the variety of objectives set forth in the Act in a reasonable way. While conservation of wildlife and wildlife habitat is obviously the organizing principal around which the national wildlife refuge system was created and is maintained, the Act correctly provides that the underlying purpose for the refuge system is not merely for the benefit of wildlife, but to conserve and develop this resource to the *people* of the United States. If wildlife were to be the only consideration in managing a refuge, there would be no need to provide for the public at all, and Congress would have written a very different piece of legislation than the National Wildlife Refuge System Improvement Act of 1997. We believe that Alternative B of the Gorges refuges plan most appropriately effectuates the inherently competing purposes of the refuge system in a way that protects wildlife *and* ensures the opportunity for people to enjoy the wildlife and habitat. In particular, many people who enjoy observing wildlife and the wildlife habitat enjoy doing so in the

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company of their dog, and the provision of Alternative B permitting person to be accompanied by leashed dogs we believe is important in fully effectuating the purposes of the refuge system.

**"Dog Walking" as a "Non-wildlife-dependent" Use**

While we endorse the recommendation of the refuge management to implement Alternative B, which would open a portion of the Dike Trail to the public, including persons accompanied by their dogs, we take strong issue with the assertion that persons who use the trail accompanied by their dogs are engaged in a "non-wildlife dependent use" of "dog walking". The National Wildlife Refuge System Improvement Act of 1997 defines "wildlife-dependent recreation" as "a use of the refuge involving hunting, fishing, wildlife observation and photography, or environmental education and interpretation". This definition sets forth the *purposes* for which persons use the refuge. Nothing in this definition precludes an individual using the refuge for one of these purposes from being accompanied by their dog. In particular, we find no statutory basis for defining an unaccompanied individual who is walking down a trail observing wildlife as engaging in a different activity than someone walking down the trail with their dog observing wildlife.

To designate the activity as "dog walking" when an individual is accompanied by their dog, and wildlife observation when they are not, is simply wrong. It would be analogous to saying that a person walking down the trail who is carrying a sandwich and a bottle of cold water is engaged in the non-wildlife dependent activity of "picnicking" rather than observing the wildlife and wildlife habitat. If someone merely wants to walk their dog, there are numerous opportunities to do that. If a person and their dog come to the refuge, they are doing so to experience the refuge environment, not merely to go for a walk. We do not believe that it is proper to classify a person visiting a refuge for one of the statutorily recognized purposes accompanied by a dog as engaged in a non-wildlife dependent activity. We strongly urge that the numerous references to person in the refuge accompanied by their dogs as engaged in "dog walking", and the classification of this activity as a non-wildlife dependent activity, be eliminated from the CCP.

Having said this, we recognize that rules of conduct for persons with dogs are appropriate, in the same manner that rules of conduct for persons without dogs are appropriate. For example, it would not be appropriate for a group of young people walking down the trail to be engaged in loud, boisterous behavior or playing a boom box at high volume. It would not be appropriate for a person who was jogging down the trail to run over persons who were walking at a normal pace, and so forth. With respect to dogs, we agreed that it is entirely appropriate to require that the dog be on leash, that it be under the control of the person accompanying it, that it not harass or disturb other visitors or create a disturbance by barking, just as it would not be appropriate for a person to

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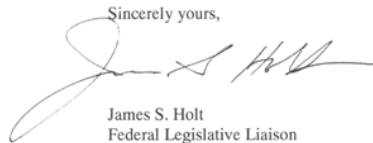
engage in such behavior. We believe that if a person is accompanied by their dog, it is appropriate to require that they collect and remove feces, in the same manner that it is appropriate for someone who carries in food or water to carry their debris out with them and not litter the refuge. We believe that it would be appropriate to bar dogs that display behavior that is threatening to other persons or wildlife, in the same manner that it would be appropriate to require that a jogger not run down other walkers and remain on the trail. Reasonable rules of behavior for all refuge visitors are appropriate.

While we support the recommendation in Alternative B to allow persons to be accompanied by their dogs, we strongly urge removal of language implying that if a person is accompanied by a dog they are *per se* not engaged in a priority wildlife dependant activity.

We would be happy to work with the refuge management and our constituents in the locale of the refuge to assist the refuge in developing and implementing reasonable policies for behavior of dogs in the refuge. Please do not hesitate to call on us if we can be of any assistance in that regard, or if you have any questions or comments about the points made in this letter.

We appreciate the opportunity to comment on the Gorges refuges' CCP.

Sincerely yours,



James S. Holt  
Federal Legislative Liaison  
The American Kennel Club

Cc Stephanie Lane  
Director of Canine Legislation

Noreen Baxter  
Vice President, Communications

Service Response to the American Kennel Club

1. We appreciate the comments you provided and the support that the AKC has given to the proposed action. To address the AKC's concern about our not referring to dog walking as "wildlife-dependent recreation," we have determined that dogs are not necessary for the safe, practical, and effective conduct of wildlife observation, a wildlife-dependent use, unless, for example, the dog is assisting a physically challenged individual. For this reason, we have addressed dog walking as a use that is separate from wildlife observation, just as we have for horse riding, bicycling, and jogging. If you are seeking clarification on a national scale regarding the classification of dog walking as wildlife-dependent recreation, specifically wildlife observation, we suggest the AKC contact the NWRS Washington Office.
2. Wildlife-dependent and non-wildlife-dependent uses of a refuge must additionally be determined to be compatible before these uses are allowed. For a use to be compatible, it must not materially interfere with the purpose(s) of the refuge or the mission of the Refuge System. Leashed dogs will be allowed along the Dike Trail because this use was found compatible in Appendix K. Again, thank you for your comments and suggestions.



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February 21, 2003

James R. Clapp  
Refuge Manager  
Ridgefield NWR Complex  
P.O. Box 457  
Ridgefield, WA 98642

Dear Mr. Clapp:

Audubon Washington has reviewed the Draft Comprehensive Conservation Plan (CCP) and Environmental Impact Statement (EIS) for the Columbia River Gorge Refuges (Steigerwald Lake, Franz Lake, Pierce). It is evident that you and your staff have worked long and hard to craft a series of alternatives that balance the interests of a broad cross section of stakeholders. We appreciate your efforts.

Audubon Washington applauds your commitment to restoring, where possible, the natural character of the lower Columbia River floodplain. While we feel that Alternative C would best achieve the mission of the National Wildlife Refuge system, we understand your need to balance a variety of uses and competing interests.

Audubon does not object to any of the proposed features common to all alternatives listed in Chapter 3 of the DEIS. In particular, we urge FWS to complete the land acquisitions within the current refuge boundary. Audubon strongly supports your proposals regarding recovery of the Western pond turtle, and managing nesting structures for Purple Martins. While we question the compatibility of a mosquito control program with the goals of a National Wildlife Refuge, your plan appears to have sufficient safeguards to ensure that detrimental impacts will be monitored and addressed, when necessary.

As mentioned above, we feel that the allocation of land to the different habitat types under Alternative C best meets the stated objectives. All alternatives state the following three goals:

1. Protect, Restore, and Enhance the Natural Diversity of Floodplain, Upland Forest, and Grassland Habitats Representative of the Lower Columbia River Ecosystem.
2. Protect and Enhance Populations of Native Flora and Fauna with an Emphasis on State- and Federally-listed Threatened and Endangered Species, Species of Conservation Concern, and Their Habitats.
3. Reduce the Impacts of Nonnative and Invasive Species on Native Flora and Fauna.

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The focus on Canada geese, and on maintaining managed fields for Canada Goose foraging appears inconsistent with the stated goals to encourage native plant community restoration and diversity, and to manage with a focus on endangered and threatened species and on species of Conservation Concern. Canada Geese are by no means a species of Conservation Concern, and the habitat maintained for them cannot be considered "representative of the Lower Columbia River ecosystem."

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Finally, we are concerned about the level of non-wildlife-dependent recreation that is proposed under the preferred alternative. The assumption is made that jogging, dog walking, bicycling are compatible with wildlife-dependent uses, but no justification is given. Please reconsider the decision to allow these activities unless there is evidence to support this conclusion. Monitoring of compatibility of public uses is planned, but monitoring should also be done to determine whether public use is compatible with the wildlife conservation objectives.

In conclusion, Audubon Washington is highly supportive of your plans for habitat acquisition and restoration, environmental education, and to continue providing for both wildlife and wildlife-oriented recreation. We applaud the work you have done to balance the needs of all the stakeholders, and look forward to working with you in the future to achieve your objectives for the Columbia River Gorge National Wildlife Refuge Complex.

Respectfully submitted,

Tim Cullinan  
Director of Science and Bird Conservation

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Service Response to Washington Audubon

1. Washington Audubon's comments and support are appreciated. The Service responded to requests to monitor and treat mosquitoes at Franz Lake Refuge by evaluating mosquito control, monitoring, and treatment in a compatibility determination signed in October 2002. The compatibility determination identified potentially negative consequences of mosquito control to non-target invertebrates and their effects on the wetland food web, particularly the relationship of invertebrates as a food source for salmonids. The Service has established stipulations to allow conditional treatment for mosquitoes in habitats physically isolated from salmon. These activities are not expected to materially interfere with or detract from the purposes of the Franz Lake Refuge. Additionally, the Service has initiated a study to determine the impacts of mosquito treatment on non-target invertebrates and fish. The compatibility determination will be revised to reflect study results, other new information, and to comply with Service policy for mosquito management.

2. Comment noted. The focus on goose and pasture management relates to the selection of Canada geese as a conservation target within this CCP. Conservation targets were selected for the Gorge Refuges for multiple criteria. Pastures and goose management were included because they were identified in the Refuge's purposes and acquisition documents for both Steigerwald Lake and Pierce Refuges. Steigerwald Lake Refuge was established for partial mitigation for habitat adversely affected by hydroelectric projects including 184 acres of pastures. Subsequent lands added to Steigerwald Lake Refuge were formerly assessed to determine mitigation credits. Canada geese were among the wildlife species used to assess mitigated habitat. At Pierce Refuge, the

original Land Protection Plan recommended that it be managed, in part, for the benefit of western Canada geese. Conservation targets were additionally identified in pertinent existing plans. Steigerwald Lake Refuge is mentioned in the Pacific Flyway Councils' management plan for both cackling Canada geese and Canada goose agricultural depredation control. Conservation Targets were also selected because they were a species of local interest or concern. The geese wintering at Steigerwald Lake Refuge consist mostly of cackling Canada geese. Cackling Canada geese are not meeting population and distribution objectives as established by the Pacific Flyway Council, with recent population trends declining. Alternative B represents an overall expansion and restoration of native lower Columbia River plant communities while maintaining sufficient managed grasslands to support the existing wintering goose population.

3. Uses of a national wildlife refuge are determined compatible when these uses do not materially interfere with or detract from the fulfillment of the National Wildlife Refuge System mission or the purposes of the national wildlife refuge. The compatibility determination in Appendix K evaluated the compatibility of jogging, dog walking, and bicycling with the System mission and purposes for Steigerwald Lake Refuge, and determined that it was compatible with the stipulations identified. Included were the requirements that Refuge staff and volunteers monitor uses to ensure compatibility, refine user estimates, and evaluate compliance to Refuge regulations. The purpose of this monitoring is specifically intended to evaluate the impacts of the proposed uses to Refuge resources and the compatibility of these uses with Service mission and Refuge purpose.

Service Response to Mt. St. Helens Chapter,  
Backcountry Horsemen of Washington

Comment Noted: Changes made to the Final CCP reflecting the correct name of your organization. Appendix K addresses the compatibility of continued horseback riding along the Columbia River Dike Trail and current magnitude of use. Chapters 3 and 4 discuss resource concerns and other limitations for public use development, such as equestrian facilities, at both Franz Lake and Pierce Refuges. Regional trails proposed by the revised Scenic Area Management Plan have been routed along the uplands around both Pierce and Franz Lake Refuges to avoid wildlife and natural resource impacts.

Gary T. Collins  
11116 NE 202nd Ave  
Brush Prairie, WA 98606

Refuge Manager  
U.S. Fish & Wildlife Service  
Ridgefield NWR Complex  
PO Box 457  
Ridgefield, WA98642

Dear Refuge Manager,

Thank you for sending a copy of the draft plan and EIS for the Gorge Refuges. It is an impressive document.

As the Director of the Mt. St. Helens Chapter, Backcountry Horsemen of Washington, I was asked reaffirm our group position that equestrian use be included in the final access plans for all sites. (Chapter 2-3, equestrian use paragraph should read meeting with Backcountry Horsemen of Washington).

As you are aware, there is considerable equestrian use of the dike at Steigerwald Lake, which is important to maintain, and more opportunities that could be developed.

Personally, having grown up in the town of North Bonneville during the 1950's and 60's, I know there are many more opportunities on the Pierce and Franz Lake Refuges, and I would like to see these developed as well.

Thank You

Gary Collins



## CITY OF NORTH BONNEVILLE

P. O. BOX 7, NORTH BONNEVILLE, WASHINGTON 98639

TELEPHONE (509) 427-8182

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September 16, 2004

James Clapp  
Refuge Manager  
Ridgefield NWR Complex  
PO Box 457  
Ridgefield, WA 98642

RE: Pierce Refuge Plan

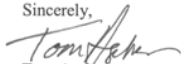
Dear Jim:

We really appreciate the meeting with you and Eric last week. This letter provides our comments on the Draft Comprehensive Conservation Plan and Environmental Assessment for the Gorge Wildlife Refuges. The City of North Bonneville is primarily concerned with the Pierce Wildlife Refuge, which is located within the western end of our city limits. The City generally supports your selection of Alternative B as the preferred alternative, with its emphasis on maintaining and restoring refuge resources. However, we feel that the public access part of the plan should more fully consider allowing public access to the refuge through North Bonneville, and to ensure the plan is consistent with the efforts of the city and others to provide for a recreation trail between North Bonneville and Beacon Rock.

We support the inclusion of interpretive signs or kiosks as proposed Alternative B, and will work with refuge staff to provide safe access to the refuge from the end of Cascade Drive within North Bonneville. The plan tends to dismiss opening Pierce Refuge up to the public due to safety concerns at the Hwy. 14 access point, and that opening the refuge would not result in a substantial improvement in recreational opportunities in the area. However, we feel that the safety issues could be alleviated by developing refuge access from Cascade Drive in North Bonneville. We also are trying to develop North Bonneville as a recreational hub, with access to many different trail experiences, and access through or around the refuge to Beacon Rock would really help our efforts. We feel the plan for the refuge should not exclude the possibility of such a trail.

Thank you very much for your consideration of our comments.

Sincerely,

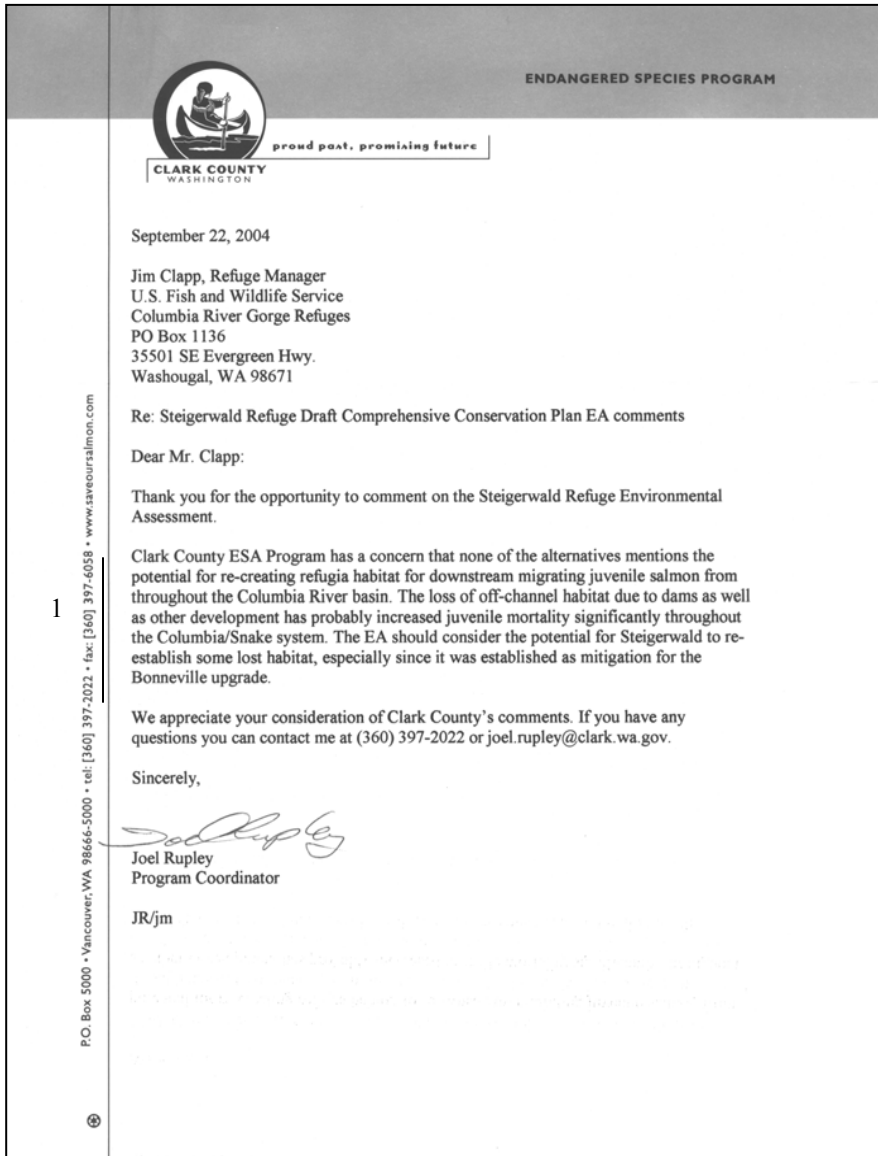
  
Tom Ascher  
Planning Advisor

### Service Response to the City of North Bonneville

1. We appreciate the comments you provided and the support that the City of North Bonneville has given to the CCP. Opportunities to increase guided tours and to facilitate environmental education are explored in the CCP. However, these activities will be limited and subject to restrictions set by the Refuge Manager relating to group size, event frequency/duration, event location, and seasonality to prevent negative resource impacts and ensure the compatibility of these uses with Refuge purposes. As stated within the CCP, Pierce Refuge is small, with listed plant and animal resources which could be impacted by opening it to general public uses, including trails. As proposed by Scenic Area's Doetsch Ranch to North Bonneville Trail, recreational trails from North Bonneville may be accomplished by utilizing uplands away from the Columbia River. Future trails adjacent to the Refuge may link recreation and urban areas while potentially offering interpretive spurs and overlooks of the Refuge without reducing Refuge natural resource values.

2. Achieving public outreach and environmental education objectives will require the resolution of safety concerns relative to crossing the railroad and merging with State Route 14. We appreciate your support of facilitating safe access for compatible public uses from the City of North Bonneville. The logistical and physical elements necessary to implement compatible public uses will be assessed within a future Site Design Plan for Pierce Refuge.





### Service Response to Clark County, Endangered Species Program

1. Reestablishing access to the historic Steigerwald Lake for migrating salmonids is a major project that would require a separate planning process to the CCP. The COE feasibility study at Steigerwald Lake (Appendix H) would examine opportunities to restore fish access to the historic lakebed. Funding for this study is not currently available. The Service submitted a proposal to the BPA for funding the study in their FY 2003-2005 budget. Although it was ranked a "high priority", the study was not funded. The Service intends to continue to pursue funding and other technical support to examine the feasibility of restoring floodplain functions, including fish habitat, to Steigerwald Lake.



September 20, 2004

Refuge Manager  
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Phone: (360) 887-4106  
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**RE: Draft Comprehensive Conservation Plan and Environmental Assessment for the Gorge Refuges**

Dear Refuge Manager:

Thank you for the opportunity to comment on the Draft Comprehensive Conservation Plan and Environmental Assessment (CCP/EA) for the Gorge Refuges (Steigerwald Lake, Franz Lake and Pierce National Wildlife Refuges). Defenders of Wildlife is a non-profit conservation organization with over one million members and supporters nationwide. We are strong advocates for the National Wildlife Refuge System and the natural heritage that the System helps protect. We would like to express our support for the proposed alternative for the Gorge Refuges as described in the CCP/EA.

The proposed action will do much to enhance the value of the refuges for wildlife, by restoring habitat, and for the public, by opening the Gateway Center and Interpretive trail for recreation and wildlife observation.

Defenders urges swift progress on the Steigerwald Lake Feasibility Study so that barriers between Steigerwald Lake, Columbia River, and Gibbons Creek may be removed and native fish may return to traditional spawning routes. We also support intervention to remove the water diversion structure at Gibbons Creek, development of spawning habitat at Gibbons Creek, the release and monitoring of western pond turtles at Pierce Refuge and Steigerwald Lake Refuge, improvement of artificial salmonid spawning channels, and construction of purple martin nesting boxes.

We approve of the decision not to open the Gorge Refuges to fishing or waterfowl hunting at this time, given that the area is too small to provide both these recreational uses and also sanctuary for wildlife.

Regarding the proposed control of mosquito populations, Defenders supports the building of bat boxes as an inexpensive and effective method of mosquito control that has few side effects for other wildlife species. We would recommend placing more weight on this action before resorting to

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other methods of control such as seasonal stocking of mosquitofish in freshwater ponds and stormwater management basins, wetland treatments, burning, mowing, and, as a last resort, application of insecticides.

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Defenders is concerned that, according to the Draft CCP/EA, funding and staff are insufficient. The description of Alternative A, the no-action alternative, states, "...at current levels of funding and staff, habitat restoration, as well as survey and monitoring, would continue to be inadequate to meet Refuge goals and objectives." Since Alternative B, the proposed action alternative, and Alternative C both involve significantly more expenditure of effort and financial investment than Alternative A, it is crucial to obtain a budgetary increase before adopting the proposed alternative. The Draft CCP/EA also suggests that staff would need to be increased from the current level (one full-time person) to five full-time staff just to carry out Refuge purposes, and eight full-time staff, one part-time staff, and three seasonal staff if the proposed alternative were adopted.

The Steigerwald Lake, Franz Lake, and Pierce NWR team are to be commended for prioritizing the restoration of habitat and maintenance of biological diversity in the refuges. The work on restoration of fish habitat, cleanup of polluted creeks, groundwater and stormwater runoff, and vigilant removal of invasive species will ensure that this land remains valuable wildlife habitat.

We appreciate the opportunity to comment on the CCP/EA for the Gorge Refuges.

Sincerely,

Noah Matson  
Director of Public Lands

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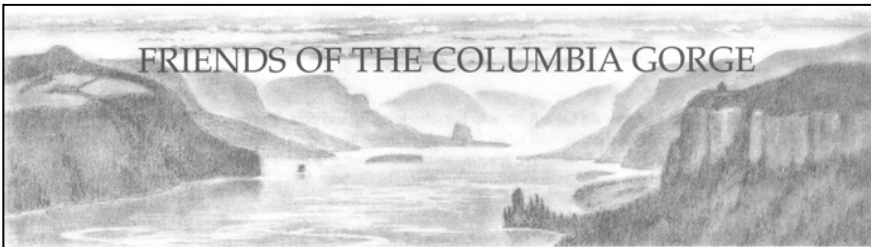
Service Response to Defenders of Wildlife

1. Comments noted. We have investigated the possibility of using bat boxes to encourage the presence of bats and subsequent predation on mosquitos, and found that the general consensus in the scientific literature is that bats, purple martins, etc., cannot be counted on to provide an effective means of controlling mosquito populations. Success in attracting bats to artificial roosts is highest in areas where bats are already using human-made structures such as barns, old buildings and bridges. These are not present in the vicinity of Franz Lake. More importantly, many species that use a bat house primarily eat moths and beetles. In addition, the majority of the female mosquitos along the Columbia River (including Franz Lake) are *Aedes vexans*, which are diurnal feeders, while bats conduct most of their feeding activities during the first few hours of early evening.

Because of their role as a predator of other aquatic organisms in addition to mosquitos, the introduction of mosquitofish into natural water bodies (such as Franz Lake) in the State of Washington is illegal. Investigations into use of prescribed burning indicates there is a potential to use this technique to kill mosquito eggs, and plans to investigate the possibilities of using prescribed burning on units of Franz Lake are included in the Proposed Burn Plan included in this CCP. Annual mowing to reduce vegetation and residual cover bordering Franz Lake has had inconclusive results in reducing mosquito populations.

We evaluated all of the above methods of mosquito control methods, but the evaluation of the use of the bacterial larvicide *Bacillus thuringiensis israelensis* (*B.t.i.*) was made in response to a request to conduct this means of control by a non-Service agency. The use of chemical insecticides was rejected because of their negative effects on invertebrate resources. A research study is being conducted to determine the effects of this larvicide on non-target organisms and subsequent effects on the food resources of listed salmonid fish prior to the use of *B.t.i.* on Franz Lake.

2. The CCP is a strategic document intended to that describes desired future condition and identifies priorities. Budget increases are not critical to adopting the plan and management direction for the Gorge Refuges. Approval of the plan does not constitute a commitment for staffing increases, operational and maintenance increases or additional funding.



VIA E-MAIL AND FIRST-CLASS MAIL

September 17, 2004

James R. Clapp, Refuge Manager  
U.S. Fish and Wildlife Service  
Columbia River Gorge Refuges  
P.O. Box 1136  
Washougal, WA 98671

**Re: Draft Comprehensive Conservation Plan and Environmental Assessment for the three National Wildlife Refuges in the Columbia River Gorge National Scenic Area**

Dear Mr. Clapp:

Friends of the Columbia Gorge has reviewed the above-referenced draft comprehensive conservation plan and environmental assessment ("CCP/EA") and would like to comment on it. Friends is a non-profit organization with members in more than 3,000 households dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside in the six counties within the Columbia River Gorge National Scenic Area.

**1. Consistency with the Columbia River Gorge National Scenic Area Act.**

Section 14(d) of the Columbia River Gorge National Scenic Area Act requires the United States Forest Service to review all proposed federal actions for consistency with the scenic area rules prior to implementation. 16 U.S.C. § 644(f)(d). The discussion of the Act at page F-2 should be revised to clearly state this requirement.

The draft CCP/EA cites Public Law No. 100-71 at page F-2. Friends interprets the law to mean that federal actions at Pierce Refuge must comply with both the National Scenic Area Act and the other cited laws.

**2. Allowed Activities**

Friends supports the Service's proposal to maintain the prohibition on hunting in the Gorge Refuges. On the other hand, Friends has concerns about the Service's proposal to officially open

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the Dike Trail at Steigerwald Lake Refuge to horseback riding and pets. The draft CCP/EA does not adequately evaluate the potential adverse effects of these uses on wildlife and plants—particularly introductions of nonnative species, soil compaction and trampling by off-trail equestrian use, and pet disturbance to wildlife behavior.

**3. Mosquito Control**

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The proposed mosquito control activities at Franz Lake Refuge may harm endangered salmonids, birds, and other wildlife that feed on mosquito larvae and other chironomids. The best available science regarding the effects of B.t.i. indicates that the larvicide may have an adverse impact on the food supply for endangered salmonids and other wildlife. Subyearling Chinook salmon rely on chironomids for food and may be adversely affected by the use of B.t.i. at Franz Lake. B.t.i. has a demonstrated adverse effect on certain non-target chironomids.

5

In addition, because the application of the B.t.i. or any other insecticide may harm endangered salmonids, the activity may require an incidental take permit ("ITP") pursuant to the Endangered Species Act. 16 U.S.C. § 1539(a)(1)(B). ITPs are required where an activity may result in the taking of an endangered species. A taking occurs when an activity harms or harasses an endangered species. 16 U.S.C. § 1532(19). Activities that harm an endangered species include those that kill or injure wildlife by "impairing essential behavioral patterns, including breeding, feeding or sheltering." 50 C.F.R. § 17.3 (emphasis added). Mosquito control treatments may remove a substantial food source for endangered salmon, which may result in a taking.

6

Finally, mosquito control activities at Franz Lake may be unnecessary. It has not been definitively established that Franz Lake is the source of the mosquitoes that local residents have encountered in the past.

**4. Impacts to Western Pond Turtles**

Alternative C would in part reduce wetlands and open water habitat. This would adversely affect habitat for the western pond turtle, which is listed by Washington State as an endangered species. If Alternative C is adopted, the plans for reducing wetlands and open water habitat should be eliminated.

Thank you for the opportunity to comment, which preserves our standing.

Sincerely,

*Nathan Baker*  
Nathan Baker  
Staff Attorney

cc: Dan Harkenrider, USFS Columbia River Gorge National Scenic Area Manager

Friends' Comments, Gorge Refuges Draft CCP/EA (FWS)

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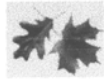
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Friends' Comments, Gorge Refuges Draft CCP/EA (FWS)

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Service Response to the Friends of the Columbia River Gorge

1. The explanation of the Forest Service's review responsibility under the Act has been added to Appendix F.
2. The amendment clarifies that the Refuge and National Fish Hatchery shall continue to be administered by the Service pursuant to the Scenic Area Act and other laws cited.
3. We disagree, and determined that horseback riding and dog-walking on the Dike Trail are compatible uses of Steigerwald Lake Refuge as long as the stipulations in the Compatibility Determination are followed. Horses and dogs are not allowed off the Dike Trail at any time. Anticipated effects to habitat and wildlife from these uses are evaluated in the CD, as well as in the Environmental Consequences section of the CCP/EA.
4. Comment noted. As described in Chapter 3 - Alternatives, Section on Mosquito Management, the Service is aware of the potential negative impacts of the use of *B.t.i.* on chironomids, which may be used as a food source for juvenile listed salmonids using Franz Lake. The Service has contracted research studies to investigate the invertebrate populations using the aquatic areas proposed for *B.t.i.* treatment, the effects of *B.t.i.* on non-target invertebrates, seasonal use of the proposed treatment area by salmonids, and food resources utilized by the salmon throughout the year. This information will be used to determine the compatibility of allowing *B.t.i.* treatment in the proposed area with the listed salmonids using the area.
5. Comment noted. Application of *B.t.i.* for mosquito control is not currently allowed in areas likely to support listed, proposed, or candidate species. Research data will assess potential effects of application to fisheries habitat. If the Service's research determines a potential effect to listed species, future applications will require appropriate consultation.
6. Comment noted. This information was addressed in the compatibility determination on mosquito management completed by the Service in 2002. Refuge staff investigated the possibility of conducting mark-recapture research to determine if Franz Lake was the primary source of the mosquitos impacting the Skamania area residents, but learned it would be too expensive to conduct the study in a large enough scope to achieve a defensible conclusion. Based on research conducted in other parts of the country, the flight range of the floodwater mosquitos using Franz Lake would enable them to be the potential source of the Skamania area resident complaints.



Kay  
KierHaggenjos  
09/21/04 09:42 AM

To: Yvette Donovan/MOBILE/R1/FWS/DOI@FWS, Glenn  
Frederick/MOBILE/R1/FWS/DOI@FWS, Eric  
Anderson/MOBILE/R1/FWS/DOI@FWS  
cc:  
Subject: Comments on Draft CCP and EA for Gorge Wildlife Refuges

----- Forwarded by Kay KierHaggenjos/RO/R1/FWS/DOI on 09/21/2004 09:42 AM -----



"Brian Litt"  
<Litt@gorgecomm  
ission.org>  
09/20/2004 05:14  
PM

To: <FW1PlanningComments@fws.gov>  
cc:  
Subject: Comments on Draft CCP and EA for Gorge Wildlife Refuges

To whom it may concern:

I would like to offer the following comments on the Draft Comprehensive Conservation Plan and Environmental Assessment for the Columbia River Gorge Refuges. Overall, this is a thorough plan that carefully assesses potential impacts of various options and addresses relevant issues facing the Gorge refuges over the next 15 years.

On page I-11, I suggest you update the reference to the *Revisions to the Management Plan for the Columbia River Gorge National Scenic Area* to reflect the formal adoption of this document by the Gorge Commission in April 2004 and the concurrence of the Secretary of Agriculture with it in August 2004. Now that these revisions have been adopted and concurred upon, they are in effect on federal lands within the Scenic Area.

As you know, all specific actions discussed under the Preferred Alternatives would need to be reviewed by the U.S. Forest Service Scenic Area Office for consistency with the *Revisions to the Management Plan for the Columbia River Gorge National Scenic Area*.

The Gorge Commission very much appreciated the presentation given to them on the Draft CCP by Glenn Frederick and Eric Anderson of your agency on August 10, 2004. It was quite informative. We appreciate the opportunity to provide these comments.

Sincerely,

Brian Litt  
Senior Planner

### Response to Gorge Commission

Thanks for your review and comment on the CCP. References to the 1992 Management Plan for the Columbia River Gorge National Scenic Area have been updated.

1



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
WASHINGTON HABITAT BRANCH OFFICE  
510 Desmond Drive SE/Suite 103  
LACEY, WASHINGTON 98503

September 15, 2004

James R. Clapp  
Refuge Manager  
Ridgefield NWR Complex  
PO Box 457  
Ridgefield, Washington 98642

Dear Mr. Clapp:

Re: Comments and Letter of Support for the Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EA) for Steigerwald Lake, Franz Lake, Pierce, and Ridgefield National Wildlife Refuges.

NOAA Fisheries has reviewed the above-referenced document received August 20, 2004, and offers the following comments at this time. Other comments may be offered as the planning process continues.

Of the three alternatives in the CCP/EA, the preferred alternative B addresses fish accessibility and habitat issues most directly. NOAA Fisheries is particularly interested in the proposal to open floodplain and restore hydrologic connectivity and access in the Gibbons Creek watershed. However, NOAA Fisheries also acknowledges that aspects of alternative C, including opening access to an additional .9 miles of habitat at Pierce Refuge in tributary springs of Hardy Slough and South Hardy Slough are also important and from a fisheries and wildlife standpoint. To that end, NOAA Fisheries supports full implementation of preferred alternative B. NOAA Fisheries would also support implementation of alternative C in combination with alternative B.

As you know, NOAA Fisheries is keenly interested in protection and restoration of federally listed fish species and their habitat. With this in mind, the potential importance of these refuges in regards to listed salmon and steelhead populations that occur throughout the Columbia and Snake River Systems cannot be understated. The construction of dams, dikes, urban development, and subsequent armoring of the lower Columbia River has severely depleted access to off-channel habitats, native spawning streams, and other important habitats necessary for salmon and steelhead to exist in viable populations. Thirteen listed salmon and steelhead ESU's could benefit directly and indirectly from proposed actions found in both alternatives B and C.



2

NOAA Fisheries encourages early and active participation of all interested resource agencies and groups throughout this process. Thank you for the opportunity to provide these comments. If you have any questions or concerns regarding these comments, feel free to contact Scott E. Anderson at (360) 753-9456, or email [Scott.Anderson@NOAA.gov](mailto:Scott.Anderson@NOAA.gov).

Dan Guy

Southwest Washington Branch Chief

Service Response to National Oceanic and Atmospheric  
Administration

1. Thank you for your comment in support of the proposed action. The final document will introduce a fisheries strategy to evaluate the feasibility of removing or modifying the structure at Domestic Springs. Implementation of this strategy would be consistent with the vision and goals of this CCP, but may require additional planning to fully evaluate the benefits and quality of restored fishery habitat and the reduction in emergent wetlands and western pond turtle habitat. Additionally, potential impacts to chum salmon habitat, in Hardy Creek bordering Domestic Springs, would need to be assessed.

The plan does not propose major landscape changes to South Hardy Slough. South Hardy Slough hosts one of a few known breeding locations for western toad in the Gorge and contains western pond turtles. Presently, South Hardy Slough is a backwater channel of the Columbia River, and as such, presumably functions as seasonal off-channel rearing habitat for juvenile salmon. In its current condition, South Slough supports both fisheries and wildlife resources. Restoring flow through the slough has the potential to alter hydrology to stream segments of Hardy Creek presently supporting spawning chum salmon.





217 Pine Street, Suite 1100  
Seattle, Washington 98101  
TEL (206) 343-4344  
FAX (206) 343-5608  
WEB nature.org/washington

September 10, 2004

Refuge Manager  
Ridgefield National Wildlife Refuge  
P. O. Box 457  
Ridgefield, Washington 98642

Attention: Comments on Draft CCP/EA for Columbia Gorge Refuges

I am writing on behalf of The Nature Conservancy (TNC) regarding the Draft CCP/EA for the Columbia River Gorge Refuge system. In general, we support the Preferred Alternative -- Alternative B -- with certain modifications, which will be noted.

1. **Columbia yellowcress and invasive species** It has been our pleasure to work closely with refuge staff in monitoring a State Threatened plant species -- **Columbia yellowcress (*Rorippa columbiana*)** -- and in controlling a non-native invasive species -- **indigobush (*Amorpha fruticosa*)** -- on the Pierce Refuge. We have provided TNC staff time for both of these endeavors, as noted in several places in the Draft document. Unfortunately, because of financial constraints, TNC's Washington Field Office has reorganized staffing and will no longer employ field personnel in the Columbia Gorge area. Because of this, references to cooperative management of *Rorippa* (p. 3-14; p. 3-32; p. 3-49; and p. 5.8) and future direct assistance in controlling indigobush (p. 3-15; p. 3-34; p. 3-49, and p. 5.8) need to be modified. In the immediate future, it is unlikely that the Conservancy will be able to supply either of these services.

2 This said, we hasten to underscore the importance of the monitoring and control work that has been initiated on the refuge. The most robust population of *Rorippa* in Washington is centered on the Pierce Refuge. Control of indigobush, which is encroaching on the *Rorippa* habitat, is of the utmost importance. Any relaxation of the indigobush control effort not only will have long term adverse impacts on the refuge's *Rorippa*, it will also adversely affect *Rorippa* populations on the downstream shoreline at Beacon Rock State Park and the Conservancy's Pierce Island preserve. Controlling this invasive species is crucial to the preservation of important components of biodiversity (e.g. *Rorippa*; open, cobble shoreline). We request that the Final CCP/EA specifically address how the habitat type will be protected, which invasives will be targeted, and how monitoring of the rare species will be carried out, given the Conservancy's altered circumstances.

2. **Oak and Woodland Savannas** We commend the Service for its stated intention to restore oak woodlands at Steigerwald and Pierce Refuges. In this case, however, we support the

Page 2.

restoration as proposed in **Alternative C**, which would restore additional oak woodland and mixed hardwoods at the Pierce Refuge. We do so for the following reasons:

- A. Historical aerial photos at the Pierce Refuge indicate forest cover on land now in open field. (p. 3-47)
- B. The refuge is of minor importance to Canada geese, for which the open fields are maintained. (p. 5-9)
- C. The increase of forested land, in general, may provide a micro-climatic cooling in the refuge area, benefiting the Federally Threatened chum salmon that spawn in Hardy Creek.
- D. Oak restoration would support the establishment of a self-sustaining population of western pond turtles, a State Endangered species. (p. 5-10) The pond turtle reintroduction project, an excellent example of cross-agency cooperation between the Service and the Washington Department of Fish and Wildlife (WDFW), is currently under way.

For all of these reasons, we urge the Service maximize restoration of oak woodland at Pierce Island and incorporate the 63 acre restoration goal contained in Alternative C within the Preferred Alternative -- Alternative B.

3. **Proposed Franz Lake Research Natural Area (RNA)** In general, The Nature Conservancy supports the creation of RNA's, and we are pleased to do so in this case, subject to some clarification. On p. 1-18 the Draft CCP/EA includes the following statement concerning the present ecological features found at Franz Lake Refuge:

*Franz Lake Refuge is the largest and most intact wapato, spikerush and bulrush marsh remaining on the Lower Columbia River.*

Were the RNA created, as included under Alternative C, the Service, in its "Strategies" section indicates that the following actions would occur:

*Remove permanent physical improvements such as roads, fences, and water control structures to the maximum extent possible.*

It is unclear from this description whether the current wapato, spikerush and bulrush community would be retained or whether the existing landscape would be significantly altered. We would like to have this more clearly addressed in the final document. In the meantime, we give conditional support to the creation of an RNA at the Franz Lake Refuge and urge the Service to engage interested parties, including the Conservancy, in discussion of this possibility prior to the finalization of the CCP.

Page 3.

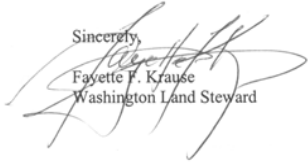
4. Miscellaneous Comments The following are recommendations and comments related to the CCP/EA. They are listed in order, as they appear in the document, and are not prioritized.

5

- A. Biodiversity Working Group – Beacon Rock State Park (p. 2-2) The Columbia Land Trust should be included in the list of participants.
- B. Conservation Targets (p. 2-5) The targets are listed for the various refuge habitats, but no distinction is made between species already present at the site and those slated for reintroduction. It would be helpful to have this distinction made in the document.
- C. Chum salmon at Pierce Refuge (p. 2-7) The document indicates that the Pierce Refuge is “one of only three substantial spawning areas for threatened chum salmon in the Columbia River near Bonneville Dam.” This is somewhat unclear. Does this refer to three sites near Bonneville Dam or three sites in all of the Columbia River?
- D. Potential for Columbia River Gorge Refuge expansion (p. 3-7) We encourage the Service to reconsider its decision not to examine ecological/management justifications for refuge expansion. We believe the CCP/EA process is uniquely designed to foster this evaluation, and we urge the Service to use this opportunity.
- E. Mapping invasives at Steigerwald and Pierce Refuges (p. 3-15) The Service proposes to survey and map invasives every 5 to 10 years. We urge that this be done every three years, at minimum. Early detection and control is crucial.
- F. Emergent wetland restoration (p. 3-23) The Service calls for “greater than 40 % cover of at least 10 genera of native or desirable nonnative, short and tall emergent plants.” We urge that active restoration use only native species and that colonization of restoration areas by nonnatives be controlled, if practical.
- G. Invasives threats assessment (p. 3-35) The Service proposes to complete a nonnative and invasive species threats assessment within five years. We urge that this assessment be completed in *no more than three years*. We further urge that the Service take immediate action against known threats, such as indigobush, so listed plant species (e.g. *Rorippa*) are not further compromised.
- H. *Aster curtus* reference (p. D-4) The document states that this plant species is “...assumed to be extirpated from WA.” If the reference is only to the Gorge Refuges, the statement is probably true. This plant is not, however, extirpated from the entire state.
- I. In-holding acquisition We encourage the Service to acquire in-holdings within the established refuge boundaries from willing sellers.

Page 4.

Thank you for the opportunity to comment. We look forward to a continuing discussion of the several points raised above as the Service considers amendments to the Draft plan.

Sincerely,  
  
Fayette F. Krause  
Washington Land Steward

Service Response to the Nature Conservancy of Washington

1. The Nature Conservancy of Washington's comments and support of the proposed action is appreciated. Pertinent sections have been rewritten to describe the monitoring period of Columbia yellowcress adjoining Pierce Refuge as 1991 to 2004. Given recent constraints on continued monitoring of yellowcress, sections have been rewritten to reflect the Service's desire to work with cooperating agencies and organizations to continue programs initiated by TNC.
2. The Refuge staff understands the significance of continued monitoring of yellowcress populations and control of competing invasive species. The CCP is a strategic document that describes the desired future condition and provides a long-range direction for management. Specific guidance would be in the form of step-down management plans. The proposed Integrated Pest Management (IMP) Plan would provide treatment options and monitoring techniques for indigobush. Since indigobush is a specific and prominent threat to a rare species, indigobush control measures will be elevated within the IPM Plan. A Biological Inventory and Monitoring Plan will also be developed as a step-down plan. The intent of this plan is to inventory priority plant communities, trust species, listed species, and conservation targets. Specific priorities, techniques, and time frames for yellowcress monitoring will be established within this plan. In the interim, the CCP will restrict public access to the shorelines and promote collaborative efforts to conserve local yellowcress populations. The plan will promote and facilitate the yellowcress research, monitoring, and protection initiated by TNC.

3. Comment noted. Oak savanna objectives at Pierce Refuge differ between Alternative B and C by the management of a 63 acre parcel. Within Alternative C, the entire acreage would be converted to oak savanna habitat. Within Alternative B, the parcel will be planted to 23 acres of oak with 40 acres retained as the only managed grassland at Pierce. Both Alternatives represent a reduction in pastures from historic levels when most of the Pierce Ranch was grazed. The original Land Protection Plan for Pierce Refuge recommended that it be managed, in part, for the benefit of western Canada geese. These early acquisition documents elevate the management of grasslands and wetlands suitable for Canada geese. The plan will retain a sufficient amount of managed grasslands to support current levels of wintering Canada geese utilizing the Refuge. The 23 acres of oak savanna identified by the plan represents an attainable target within the planning horizon.
4. Research Natural Area values within Franz and Arthur Lakes are not impacted by permanent man-made physical structures. Refuge hydrology is largely the product of Columbia River levels, local precipitation, surrounding watersheds, seeps, springs, and beaver dams within the wetland complex. The CCP proposes that Franz and Arthur Lakes maintain direct connectivity with the Columbia River. The plan will implement management activities to reduce non-native plants and promote emergent wetland communities at Franz Lake Refuge. Your conditional support of the Franz Lake RNA is noted. However, the RNA concept has not been adopted by the Final CCP/EA.

5.

- A. change made
- B. Table 2-1 edited to depict species present in the planning unit.
- C. Sentence changed.
- D. The Service has established an acquisition boundary for the Gorge Refuges within which lands may be acquired to achieve the Refuge purposes. The Land Protection Plan (Appendix L) assesses land acquisition priorities within the acquisition boundary. Refuge expansion beyond the acquisition boundary has not been deemed necessary to fulfill Refuge purposes.
- E. Agreed that early response is critical. More frequent would be optimal; however, five year is presumed a realistic interval. The plan identifies intervals of at least once every five years.
- F. Comment Noted: Restoration efforts will capitalize on exposing and promoting native persistent seed banks in the soil. The statement concerning desirable nonnatives is in recognition that minor occurrences of select nonnative wetland plants may be utilized by wildlife as a food resource (e.g. barnyard grass, nutsedge, and some polygonums).
- G. An Integrated Pest Management Plan is described in the CCP, which will include a threat assessment. Current management is taking action against bullfrogs, carp, blackberry, thistle, and knotweed.
- H. Change made.
- I. Comment noted. Thanks for your support for land acquisitions from willing sellers within the Refuge boundary.

Service Response to the Port of Camas Washougal

1. Maps have been revised to show current Scenic Area Boundary.

Port of Camas Washougal  
24 South A Street  
Washougal WA 98671  
360.835.2196 x101  
fax 360.835.2197  
[Sheldon@portcw.com](mailto:Sheldon@portcw.com)

TO: Jim Clapp  
Refuge Manager  
Columbia River Gorge Refuges  
US Department of the Interior  
US Fish and Wildlife Service  
PO Box 1136  
Washougal

FROM: Sheldon Tyler  
Executive Director

SUBJECT: Draft Comprehensive Conservation Plan and Environmental Impact  
Statement

DATE: August 19, 2004

1

Thank you for the opportunity to comment on referenced subject. I note on the various Figures showing the Steigerwald Lake area that the Columbia Gorge NSA Boundary is not drawn correctly, whereby as shown it incorporates some Port owned properties within the boundary. As you are well aware, federal legislation within the past 5 years directs that the boundary be modified not to include Port owned properties.

Thank you in advance for incorporating the change.

Port of Camas Washougal  
 24 South A Street  
 Washougal WA 98671  
 360.835.2196 x101  
 fax 360.835.2197  
[Sheldon@portcw.com](mailto:Sheldon@portcw.com)

TO: Jim Clapp  
 Dept of the Interior  
 US Fish and Wildlife Service  
 Ridgefield National Wildlife Refuge Complex  
 PO Box 457  
 Ridgefield, WA 98642

FROM: Sheldon Tyler  
 Executive Director

SUBJECT: USFWS Draft Comprehensive Conservation Plan and Environmental Assessment of the Steigerwald Lake National Wildlife Refuge

DATE: September 13, 2004

Thank you for the opportunity to comment on referenced subject, and for meeting with me the other day to present your ideas and hear mine.

To confirm and evidence in writing my comments in that meeting, I offer the following:

Steigerwald Lake, pre 1966, was a seasonal lake that flooded when the water levels rose in the Columbia River. In 1966, at the request of the Port and local land owners, federal funding was received and the Corps of Engineers constructed a 40 ft high levee surrounding the lake. This project also installed three 20,000 gallon per minute flood pumps for the Port to maintain and operate, thereby transforming the basin into a flood control facility. The size of the pumps were designed to work with the ponding capacity of the basin to minimize the potential of a flood occurrence that would cause financial and economic disaster to the Port's Industrial Park and the city of Washougal. This program has worked without failure since it was constructed.

It must be kept foremost in mind that the Port's Washougal Industrial Park is home to approximately 36 industries, 900 well paid employees earning over \$27 million in payroll annually, and generating over \$1 million in property taxes per year. Flooding of this area, and residential areas, would have severe economic and emotional impact, and is not something that the Port wants to be connected with in any way.

It must also be acutely recalled that the Steigerwald Refuge was created by an act of Congress nearly 20 years after the basin was created, and although it was created to

1 mitigate for the Bonneville Dam Second Powerhouse, (isn't it interesting that the first powerhouse has yet to be mitigated for), Congress did not set the level of mitigation, leaving that to the US Fish and Wildlife Service, only stating that this acquisition shall mitigate for the second powerhouse. The point here is that development of the refuge is certainly your charge, the level of that development was left open ended when the funds were appropriated to acquire the original 682 acres for the refuge.

2 Therefore, the Port of Camas Washougal respectfully requests the US Fish and Wildlife Service keep foremost in mind, that yes, wildlife refuges have a function and purpose, but the economic vitality of the area is primary, for residences and for facilities for generating economic wealth and taxes to support state and federal programs. The Port has seen an increase in waters coming to it's flood control pumping facility, and has purchased a fourth pump to have in reserve should one of the three in place units fail. The Port may try to obtain funding to get this fourth pump permanently installed, but this is a long range project.

3 Also please keep in mind that the Port funds all the pumping costs, to include maintenance and rebuild of the pumps (nearly \$10,000 annually), and the nearly \$30,000 annual power bill to run the pumps. Also recall that the Port rented and provided the labor to operate a track hoe to dredge out the gravel at the diversion facility, normally a Service responsibility, in addition to trimming and removing trees on USFWS properties intruding onto Port lands.

4 Having said all of the above, it is the Port's urgent request that management of the flood basin, now called Steigerwald Lake National Wildlife Refuge, be conducted where the water levels be drawn down to an absolute minimum during the winter months to allow for the freshet season, normally occurring in February to April. In other words, recognize and manage the basis for a flood control facility first, and a Refuge second.

We owe nothing less to our constituents, those that pay property taxes to the Port and income taxes, eventually, to the US Fish and Wildlife Service.

Again, thank you for allowing the Port of Camas Washougal to comment on the Draft Comprehensive Conservation Plan and Environmental Assessment for Steigerwald Lake National Wildlife Refuge.

Service Response to the Port of Camas Washougal (Continued)

1. Comment noted. The Service agrees with your statement that Steigerwald Lake Refuge was created by Congress to mitigate for the construction of the Second Powerhouse at North Bonneville, and that while the Congressional authorization was not specific as to the level of mitigation, it was clear that wildlife habitat development and management was the primary purpose for establishment of the Refuge.

2. Comment noted. The Service acknowledges that the economic vitality of the area is of primary consequence to the Port of Camas Washougal. In addition to the authorization of the Refuge by Congress to provide for wildlife and fish mitigation, however, the fundamental mission of the National Wildlife Refuge System, as stated in the National Wildlife Refuge System Improvement Act of 1997, is wildlife conservation. All management and activities conducted on the Refuge must be compatible with that mission.

3. Comment noted. The Port has indicated that it has seen an increase in waters coming to its flood pumping facilities, and that there is a \$30,000 annual cost.

U.S. Army Corps of Engineers documents (1985 Environmental Assessment and 1988 Feature Design Memorandum) describing the acquisition of Steigerwald Refuge lands and design/operation of the Gibbons Creek facilities all make reference to the fact that the facilities would substantially reduce but not eliminate the extent of pumping required for flood control purposes. This was primarily the result of the rerouting of Gibbons Creek waters directly to the Columbia River, eliminating the need for the Port to pump those waters except for high flow circumstances of Gibbons Creek. If the Port has seen increases of pumping costs since the Gibbons Creek facility development, it may be the result of four factors:

- a. An increase in electrical rate costs.
- b. An increase in Gibbons Creek flows from its surrounding watershed, as a result of the greatly increased residential development during the last 10 years.
- c. An increase in winter precipitation.
- d. An increase in the frequency that Gibbons Creek has flowed over the spillway.

The Service has done its best to reduce the occurrence of factor d., as Refuge maintenance staff has cleaned the area in front of the spillway on numerous occasions. It also appreciates the cooperation of the Port last winter.

4. Comment noted. Again, the Service acknowledges that the economic vitality of the area is of primary consequence to the Port of Camas Washougal, but emphasizes the fact the Refuges are authorized by Congress to be developed and managed with wildlife conservation as their primary responsibility.

See Appendix M -Water Management Guidelines. In order to provide some degree of flood control, however, water levels in the impoundment immediately above the Port are kept at a low level between November and April. Although this will not provide the optimum emergent wetland plant conditions, it will provide for establishment of a willow shrub community in the northeast corner of that unit.

Tom Price  
451 INDIAN MARY ROAD  
SKAMANIA, WA 98648  
(509) 427-4253

Sept 7, 2004

Ridgefield NWR  
P.O. Box 457  
Ridgefield, WA 98642

Re: Gorge Refuges

Dear Sirs;

Your CCP/EA was a welcome sight. It is an outstanding example of bureaucratic efficiency that this 15 year plan for management of these refuges comes approximately 15 years after their acquisition. It appears to me that the "managers" of these refuges have had so little to work with, for so long, that they have lost sight of the reason for the existence of the refuges. This is especially annoying, to me, at Franz Lake. So, I will go over a bit of history before I comment on your plans for the future.

In the summer of 1977 the Nature Conservancy informed us that our lake had a small patch of a plant which was extinct in Washington and endangered in Oregon. This was wapato, *Sagittaria latifolia*, the most important plant in the culture and economy of the Natives of the Gorge. We restricted the grazing to protect the wapato, which cost us a significant part of our income. That winter eight tundra swans (Lewis and Clark named them "whistling swans" and I prefer that name) came in to eat the tubers of the wapato. The wapato patch doubled in size, and the swan population kept pace, until Franz Lake was covered with big arrowhead shaped leaves each summer and up to 1000 swans wintered over here. Wapato patches sprouted in several other locations, the largest at Rooster Rock State Park. We had armed confrontations

with waterfowl hunters for several years, until the word got out.

So, we rescued a plant from the "Endangered" list (it is now "Scarce but Stable") and returned the swans to the Gorge after a 50 year absence. This made Franz Lake "prime wildlife habitat" and the friends of the gorge put it at the top of the list for "Federal Acquisition and Protection". The Fish and Wildlife Service purchased the lake and land, but did not have funds to maintain or manage the refuge. Blackberries and reed canary grass crowded out most of the native plants on land. Indigo weed grows along the river bank. Tansy ragwort has been a problem for 25 years, but no action has been taken to control it for the last 16 years. Beaver dammed the channel draining Franz Lake, which stabilized the water level, which made great habitat for Milfoil, and which made it difficult for the swans to get to the tubers in the mud. This is not the level of Federal Protection which I had hoped for.

Your Alternative B meets most of my expectations, if not my hopes. This plan should have been implemented long ago. It may not be reasonable to expect the USF&WS to match the stewardship of the private landowners who preceded them, but this plan does restore the wildlife habitat to the condition it was in when it was purchased.

The wapato and the swans are the reasons that Franz Lake NWR exists. They should be the focus of the plans for the future, but the big picture must include all aspects of habitat maintenance. It is my opinion that invasive plants are the most serious threat to be dealt with.

Thank you for giving me this opportunity to comment. I did not stop caring about this land when I sold it. I will not stop caring about this land.

Sincerely,

*Tom*  
Tom Price.



Service Response to Tom Price

1. We agree, and the CCP contains a goal with objectives and specific strategies to increase the surveillance, monitoring, research, and treatment of invasive species at all three of the refuges.

**SKAMANIA COUNTY MOSQUITO CONTROL DISTRICT**  
**22 Farnsworth Road**  
**Skamania, WA 98648**

September 19, 2004

TO: All receivers of this package

Without the bulky DRAFT COMPREHENSIVE CONSERVATION PLAN AND ENVIRONMENTAL ASSESSMENT to refer to, we think you will get the message we are sending.

If you want a copy of the draft, please contact Tom Melanson at the Ridgefield USFWS Complex at the address on the original letter.

cc: (complete package)

Liz Luce- District Rep for Senator Maria Cantwell  
 Dena Horton- District Rep for Representative Brian Baird  
 Jim Honeyford- State Senator 15th District  
 Bruce Chandler- State Representative 15th District  
 Jo Marie Brauner- WA State Health Dept.  
 Carolyn Bohan- USFWS  
 USFWS- Division of Refuge Planning  
 Jim Clapp- Manager, Gorge Refuges USFWS  
 Pacific Northwest CCP Team

**SKAMANIA COUNTY MOSQUITO CONTROL DISTRICT**  
**22 Farnsworth Road**  
**Skamania, WA 98648**

Refuge Manager  
 Ridgefield NWR Complex  
 PO Box 457  
 Ridgefield, WA 98642

September 19, 2004

**IN RESPONSE TO: Draft Comprehensive Conservation Plan and  
 Environmental Assessment  
 Steigerwald Lake NWR  
 Franz Lake NWR  
 Pierce NWR**

Dear Sir:

The Skamania County Mosquito Control District's main interest is in Franz Lake NWR in regard to mosquito control. The product we use is Bti that is specifically labeled for mosquito and black fly larvae. This product has been approved by the EPA, recommended by Linda Lyon, an environmental toxicologist for the U.S. Fish and Wildlife Service, and Ohio State University.

Many references through out the DRAFT (minimum of 11 times) state that the USFWS proposes to use chemicals (approved herbicides Rodeo and Aquamaster) to kill invasive plants. Their applicator would use only a herbicide specifically labeled for the target weed species. (See page 5-11)

Now, what is the difference? I guess it all depends on whose purpose it will support.

Bti has been used for mosquito control around the world successfully since 1978. What is the track record of the chemicals the USFWS proposes to use? Will they harm fish and birds? Or do you believe the label?

(Page 5-7) "Herbicide use would be less under Alternative C than the other alternatives possibly reducing potential effects to non-target organisms". Yet the USFWS prefers Alternative B where most chemical would be used. It also states the USFWS is aware of potential effects to non-target organisms. But the USFWS is still going to use it around listed fish and birds.

(Page 5-13) Refers to establishment of Franz Lake Research Natural Area where everything is natural for scientific study. Chemicals would be used for plant, insect, and disease control.

(Page 6-14) "Integrated Pest Management Plan" The Plan would address strategies

## Page 2

5 To implement chemical, mechanical, and biological control methods required to control the target species. The plan will also describe how to kill off birds and fish that are undesirable.

The Skamania County Mosquito Control District is not opposed to using herbicides to kill noxious weeds. We are opposed to the idea that non-chemical Bti cannot be used in the same area as the chemicals as Bti 'may' harm fish food.

6 The Nature Conservancy is going to experiment with chemicals on 'their' land next to Pierce NWR. Are they qualified researchers?

The Nature Conservancy is mentioned many times in the DRAFT. They are also mentioned many times in the enclosed article from the "Whistleblower" magazine under the title of 'The Wilderness Blob'.

(Page 3-37) Refers to non-refuge personnel to do research on Gorge Refuges. These personnel may range from local volunteers to "Foreign Country-based Researchers"

On page 7 of the enclosed article "Organization Wields Control Over Billions of Dollars". It tells who is involved with the United Nations. America does not need or want the United Nations planning and controlling our lands.

The USFWS is listed as a member of the 'International Union For the Conservation of Nature (IUCN)'. So is The Nature Conservancy. So is the group responsible for the "Spotted Owl" fraud.

USFWS personnel were involved in 'planting Canadian Lynx fur in the Gifford Pinchot National Forest', attempting to get more lands listed as 'critical habitat'.

(Page 1-11) Planning occurs at regional, state, national and INTERNATIONAL scales.

7 (Page 4-22) It is suggested that Indian Mary Watershed is suitable habitat for the Spotted Owl. According to the Sierra Club, the Spotted Owl can only live in old growth forests with 500 acres per pair. The Franz Lake NWR land north of Highway 14 was logged off before the USFWS bought it. That kills that idea, or does it?

(Page 1-15) "Partners in Flight" was conceived as a voluntary INTERNATIONAL coalition dedicated to reversing downward trends of declining species. Another international group making plans for United States property. Who pays the bills for all these groups?

## Page 3

The Skamania County Mosquito Control District is a voluntary LOCAL group dedicated to reversing the downward trend of quality of life and halting the increasing health hazard (West Nile Virus) due to the mosquitoes at Franz Lake NWR. We know who pays the bills; the taxpayers in this district (Americans).

With West Nile Virus now in Oregon, how long will it be before it gets here?

(Page 3-4) The Service has concerns of Bti treatment being routine and widespread. The Service was given a complete report of all surveillance, treatment, species type and count which shows that it is far from routine. No treatment was done (in the small area allowed) unless careful larval count was done and surpassed USFWS requirements. Skamania County Mosquito Control District does not have lots of money to throw away on excessive use of Bti and labor. Even if we did, it would still be handled in a conservative manner. We are a responsible group whose goal is to protect the "Human Environment" for the residents in our district.

"Human Environment" This term is missing in the DRAFT except in Appendix F, page F-4. The "National Environmental Policy Act" (NEPA) which refers to 'significant effects on the Human Environment'.

The subject of land acquisition comes up a number of times in the DRAFT.

(Page 1-15) Pacific Coast Joint Venture (who is really in this?) recommends specific actions for each refuge. For Franz Lake NWR: protect existing habitat values through acquisition of lands and easements, zoning, and land use regulations. If you can't buy it, regulate it.

8 (Page 2-2) Biodiversity Working Group (at Beacon Rock State Park) including The Nature Conservancy. Meeting topics included land acquisition.

(Page 6-17) The CCP would be revised when 'major refuge expansion occurs, or when the need to do so is identified.

This indicates that there are some big plans for the future that are not discussed in the DRAFT.

9 (Appendix L) Land protection plan: all about the desire to acquire property.

(Page 6-5) Develop and maintain a "Friends of the Gorge Refuges" group. (Just what we need in the gorge, another Friends group)

There were many references to turtles in the DRAFT. How could we survive without thousands of turtles? By the way, they don't like mosquitoes either. They

Page 4

Were observed having to go underwater to escape the mosquitoes (in another location). After treatment with Bti, the turtles returned to their resting place no longer bothered with mosquitoes.

(Page 3-4) The USFWS has a Region 1 Mosquito Management Policy that has not been offered for review. Per the CDC for Franz Lake NWR for mosquito control, the actions required of the SCMCD are monitor, identify sites and types of mosquitoes and give a detailed report of all information. But we can only treat a small area east of the dike, if you call first. Item 5 on the requirement list says the Service expects to develop a contingency plan as soon as possible to identify the authorizing agencies, etc. to be used in the event of a disease outbreak. How long will this take? At the pace events have happened so far, it will take years.

All the birds and animals the USFWS wants to protect are all capable of getting West Nile Virus. The CDC and the USGS have published lists of avian and animal mortality from West Nile Virus. If the true goal of the USFWS is to protect birds and animals, then mosquito control should be a high priority on their list. Its too late to start talking about it after the Virus arrives. That's what happened in Colorado last year.

(Page 2-11) It is stated that the type of mosquitoes at Franz Lake NWR are not carriers of West Nile Virus. On the Washington State Dept. of Ecology list, Aedes vexans are listed as disease carrying mosquitoes.

To close, we question the real goals of the USFWS and the Gorge Refuges. A continuing research effort and communications with our State and National representatives will go on.

Thank you for the extra week to review and comment on the DRAFT.

Sincerely,

Skamania County Mosquito Control District



Nels Madsen, Chairman



AL GOSIAK



Dave Kuhn

Pat Wallenmeyer



Paul Willis

Attachment included with original comment:

Lamb, H. 2002. The Wilderness 'Blob', Exposing the radical environmental transformation of America. Whistleblower. 11 (10) : 4-11.

### Service Response to Skamania County Mosquito Control District

1. Comment noted. The difference is that in the case of *B.t.i.*, it is being proposed for application in an area believed to be used by listed salmonids, which feed on invertebrates believed to be negatively impacted by the proposed product. Research is being conducted to determine this information at Franz Lake. In the case of Service applied herbicides, they will not be used in areas of suspected or known listed species.
2. Comment noted. Refuge staff uses herbicides following national and regional Service guidelines, which include: 1) development of an integrated pest management plan (IPM) to identify a variety of information regarding weed species, including name, location, extent of occurrence, types of treatment and precautions to be used; 2) preparation of a Pesticide Use Proposal (PUP) before chemicals are used on the Refuge; 3) using only chemicals approved by national or regional Service IPM staff based on their safety in the vicinity of terrestrial and aquatic resources; 4) following label and material safety data sheet instructions; 5) detailed analysis of potential effects to listed, proposed, and candidate species and critical habitat and Section 7 consultation as required by the Endangered Species Act.
3. Comment noted. The Service does prefer Alternative B, which requires the use of pesticides in the control of non-native and invasive species. It does not, however, plan to use these products in a manner that they can cause harm to listed fish and wildlife, as described in the response to #2 above.

4. Comment noted. With the selection of Alternative B, a research natural area will not be established at Franz Lake.

5. The Integrated Pest Management plan (IPM) will identify a variety of information regarding weed species, including name, location, extent of occurrence, types of treatment and precautions to be used. This plan is anticipated to be developed by the end of 2005 and approved by the Regional IPM Coordinator before implementing any chemicals not on the nationally approved pesticide list.

6. Comment Noted. The land on which The Nature Conservancy (TNC) was going to evaluate the use of herbicides on the treatment of false indigobush was believed to be below the ordinary mean high water line and as such was owned by Washington Department of Natural Resources. In this case, their qualification as “researchers” is not under the authority of the Service. TNC has recently informed the Service that because of budget shortfalls and reprioritization of work activities, their staff presence and their work activities in southwest Washington will be suspended. At the same time, additional investigation has revealed that without a property survey, the actual boundary between the Refuge and state waters is unclear. Because of this and the presence of the State listed species, the Service will address monitoring *Rorippa* and controlling indigo bush in the appropriate step-down plans as identified in the CCP, and will look for partners to work with us to accomplish these tasks.

7. The planning team concurs that Franz Lake Refuge may lack habitat characteristics for nesting northern spotted owl. However, the second growth coniferous forest of Indian Mary watershed may represent viable dispersal habitat for transient non-breeding birds. Our analysis is that this plan would not affect northern spotted owl critical habitat.

8. The approved acquisition boundary formally and clearly establishes the extent to which the Service may acquire interests in land to achieve refuge purposes. The Service does not propose to expand or otherwise alter existing acquisition boundaries for the Gorge Refuges, as part of this CCP. The Land Protection Plan (LPP) for Steigerwald Lake and Franz Lake Refuges states that the Service would purchase fee title or easement interest from willing sellers of privately owned lands within the acquisition boundary, contingent upon funding availability. Law requires the Service to offer fair market value when acquiring lands. If fee title is required, full consideration is given to extend use reservation, exchanges, or other alternatives that will lessen any impact on the owner and the community. The intent of the LPP is to inform and update landowners and the local interested public of the resource protection needs, implementation schedule, and acquisition priorities within the established acquisition boundaries. A LPP was not developed for Pierce Refuge because it is already fully acquired.

9. Comment noted. Refuge Friends groups can provide assistance in helping their local community in understanding the mission of the refuge as a place for wildlife first. It can help by volunteering for projects to improve refuge resources, educating needs of the refuge to congressional representatives, raising public awareness and interest in a refuge, and raising funds to support refuge projects and programs. Friends Groups at refuges across the country have proven invaluable in providing an organized opportunity for local citizens to support a refuge in their area.

10. The “Region 1 Mosquito Management Policy” referred to is actually a draft set of management guidelines for all of the refuges in the Pacific Region of the Service to assist them in planning for and meeting associated compliance requirements for dealing with mosquito issues, including West Nile Virus (WNV), and is not required to be released to the public for review. The National Mosquito Policy is also unfinished and in draft form, and not yet ready for public review. The Franz Lake WNV Contingency plan is planned for completion during the winter of 2004-05, in conjunction with a planned review of the invertebrate/salmonid research results and appropriate revision of the mosquito compatibility determination.

11. Comment noted. According to Mike Higgins, National Wildlife Refuge System Mosquito Management Coordinator, the Service is aware that WNV is fatal to some species of wildlife, especially corvids, with avian impacts varying greatly from one location to another. The primary concern is the potential for impacts to threatened and endangered species. There has been some work with experimental avian vaccines for listed raptors, but the safety and efficacy of these have not been fully documented.

12. The text you reference of the CCP states that “In the United States, West Nile Virus is transmitted by mosquitoes, primarily members of the *Culex* species.” Experimentally, *Aedes* mosquitos, typical of Franz Lake, have a moderate ability to transmit diseases, although the potential for transmission is possible. The statement has been modified.



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

September 17, 2004

Mr. James R. Clapp  
Refuge Manager  
Ridgefield National Wildlife Refuge Complex  
PO Box 457  
Ridgefield, WA 98642

Dear Mr. Clapp:

Thank you for the opportunity to comment on the Draft Comprehensive Conservation Plan and Environmental Assessment (CCP/EA) for the Steigerwald Lake National Wildlife Refuge in Clark County and Franz Lake and Pierce National Wildlife Refuges in Skamania County. We reviewed the CCP/EA and have the following comments:

**WATER QUALITY: Roberta Woods (360) 407-6269**

Each of the three proposed conservation plans for the Steigerwald Lake, Franz Lake and Pierce National Wildlife Refuges has activities, which have potential to impact water quality (e.g., removal of fish barriers; and invasive species removals). Project-related water quality issues may be minimized with the timely implementation of Best Management Practices (BMPs) for turbidity control, and sediment and erosion control. When erosion control measures are properly installed and in place prior to any construction or demolition activities, those BMPs will have the maximum effectiveness in controlling erosion and discharge of sand, silt and soil into waters of the state. Waterbodies affected by the project with water temperature issues may also benefit from effective erosion control practices. Silting up can be minimized, and adequate water depth and pools can be maintained. Any discharge of sediment-laden runoff or other pollutants into waters of the state is in violation of Chapter 90.48 RCW, *Water Pollution Control*, and WAC 173-201A, *Water Quality Standards for the State of Washington*, and is subject to enforcement action.

If you have any questions or would like to respond to these comments please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(04-5819)

cc: Roberta Woods, WQ

Service Response to State of Washington, Department of Ecology

1. The CCP is a strategic document that describes the desired future condition and provides a long-range direction for management. As specific projects are implemented, step-down management plans, project permits, and proposals will address specific measures and management practices to minimize impacts to the aquatic environment and other natural resources. Chapter 90.48 RCW, *Water Pollution Control*, and WAC 173-201A, *Water Quality Standards for the State of Washington*, have been incorporated into Appendix F. Thanks for your comment.

**Washington Department of Fish and Wildlife (WDFW) Comments on August 2004  
USFWS Columbia Gorge Refuges – Draft CCP/EA  
September 16, 2004**

**Western Pond Turtle**

(3-3) – Western Pond Turtle Feasibility Study, Steigerwald Lake Refuge

1 WDFW agrees that a preliminary evaluation needs to be done to determine if Steigerwald Lake can support a reintroduced population of western pond turtles. This evaluation would take into consideration the parameters outlined in the Washington State Recovery Plan for the Western Pond Turtles. We do not agree that we need the Western Pond Turtle Working Group's blessing before the project could take place...just the consideration that we would review any recommendations they have for the project. They can receive a copy of the evaluation and comment as any other interested party.

2 With regard to reintroductions, WDFW requests that the language in the CCP does not limit releases to headstarts alone. By the time reintroductions might take place at Steigerwald Lake Refuge, we may also want to trans-locate adults as well as headstarts. This is currently planned in 2005 for a reintroduction site in Puget Sound.

3 WDFW disagrees with the stipulation that the final decision on allowing a release at Steigerwald be made after a feasibility study is completed by the Corps of Engineers (COE). The feasibility study has no given timeline for completion and therefore would possibly cause unnecessary delays while waiting upon federal funding for this project. In section H-8, a letter referenced from the COE states that funding is currently unavailable for the feasibility study. Under this scenario, a decision may not ever be made on a release of WPT due to COE funding issues. WDFW would like a cleaner process for making a preliminary evaluation and receiving USFWS approval. The timeline for developing this information would be dependent upon WDFW's ability to provide and adequate environmental assessment, not COE funding process for a feasibility study.

4 In addition on page H-3 paragraph 2, under "Project Scope" it states that mitigation at Steigerwald will have a bias towards fish management under the proposed COE feasibility plan. I would suggest that any hydrologic changes made at Steigerwald consider all fish and wildlife species. Mitigation should target all species and habitats that were lost to hydro-inundation. A fish only bias would ignore the need to enhance biodiversity.

5 WDFW recommends that the language on page 3-3 – Western Pond Turtle Release Feasibility Study, Steigerwald Lake Refuge reads as follows:

*The WDFW will evaluate the feasibility of establishing a western pond turtle population at Steigerwald Lake Refuge. Baseline surveys for any existing western pond turtles would be conducted at Steigerwald Lake. The evaluation will consider if there is*

*adequate foraging and nesting habitat to support a reintroduced population. Parameters for establishment of this population are outlined within the Washington State Recovery Plan for the Western Pond Turtle<sup>25</sup>.*

5 *The evaluation will address issues including but not limited to: (1) a narrative explaining that a release program will not detract from the Refuge purposes and Service priorities; (2) evaluation of historic records of western pond turtles in Clark County; (3) justification that Steigerwald Lake Refuge either occurs within the Columbia River Gorge or the Western Washington recovery segment of the Washington State Recovery Plan for the Western Pond Turtle; (4) evaluation of the western pond turtle genetics and its applicability to releases at Steigerwald Lake; (5) visual and/or trapping surveys to determine the presence or absence of pond turtles at Steigerwald Lake; (6) soil survey to determine suitability for pond turtle nesting; and (7) criteria and clearance for disease testing in head-started and adult turtles. The Service will make the final decision to allow release of the turtles after the WDFW evaluation has been completed.*

**Opening Gorge Refuges to Waterfowl Hunting**

6 The USFWS does not propose to open Franz Lake or Pierce NWR to hunting. WDFW supports the USFWS position on the hunting issue at these two refuges.

7 Regarding Steigerwald Lake NWR, WDFW would like to reiterate the recommendations made in an October 3, 2003 letter from Director Koenings and Fish and Wildlife Commission Chair Roehl to USFWS Director Williams. The CCP core team and USFWS made a determination that waterfowl hunting should not be allowed at Steigerwald NWR, based on a biological evaluation presented in Appendix E. In this evaluation the decision was made that Steigerwald NWR currently does not provide adequate habitat to support a hunting program. WDFW continues to support limited hunting on Steigerwald Refuge as long as it is compatible with refuge purposes, goals, and objectives for overall species management and non-hunting wildlife recreation opportunities. We request that the USFWS re-evaluate the potential for a limited access, high quality hunting program on current refuge lands under the preferred alternative, regardless of new acquisitions. Canada goose hunting at Steigerwald NWR would contribute to fulfilling the goals of the Northwest Oregon / Southwest Washington Agricultural Depredation Control Plan, approved by the Pacific Flyway Council. A hunting program would generate additional support for refuge management, and serve the traditional wildlife-oriented segment of the public that have contributed to wildlife management programs over the years.

8 A hunting program at Steigerwald NWR could involve limited access by permit only, designed to maintain current waterfowl use of the area. Several other refuges with significant wildlife viewing programs (e.g. Nisqually NWR and Ridgefield NWR) near metropolitan areas offer limited access hunting programs, and we believe a program could be designed at Steigerwald that would be compatible with other refuge considerations. Public waterfowl hunting, particularly walk-in access within easy driving distance of metropolitan areas, is in short supply throughout Washington State. We are



seeing lands formerly open to public access closed due to residential developments or private hunting leases in many parts of the state. Because of this trend, we would like to see the refuge re-evaluate the potential for hunting opportunities on existing refuge lands at Steigerwald NWR.

#### Service Response to Washington Department of Fish Wildlife

1. The USFWS believes that this project transcends state boundaries given that the turtles could feasibly cross the Columbia River and occupy currently un-inhabited range or mix with pond turtles of unknown genetic origin in Oregon. Concurrence with the Western Pond Turtle Working Group will be removed from the requirements. The completion of an Environmental Assessment and other appropriate agreements will be required prior to implementation.
2. Language will be changed to include adult introductions.
3. Given the current status of the feasibility project, this language will be removed.
4. Comment noted. All proposed projects will be evaluated and implemented with respect to fulfilling the purposes and objectives of the refuge.
5. Comments noted for new language.
6. Comment noted.

7. Potential disturbance from opening a waterfowl hunting program at Steigerwald Lake Refuge was reevaluated within an expanded study area. Providing a limited access, limited duration hunting program on current Refuge lands would impact approximately one-half of the Refuge's best wetland habitat. Due to the Refuge's small size and limited amount of sanctuary, waterfowl use of the Refuge would be measurably reduced on hunt days. Because the purpose for the Refuge is to mitigate for the loss of important waterfowl habitat along this stretch of the Columbia River, opening the Refuge to hunting without providing adequate sanctuary area would not achieve Refuge goals and objectives and would materially interfere with or detract from the fulfillment of Refuge purposes. The Service does not currently control all of the lands within the approved refuge acquisition boundary. The largest remaining parcel, representing approximately one-half of the lands the Service determined it needed to acquire to form a viable refuge, includes habitat necessary for optimum management of water levels and public use on this Refuge. We have added a new objective to the plan to reanalyze hunting opportunities should the Service acquire sufficient management interests in these adjoining lands. This objective is also stated in the Refuge's Land Protection Plan.

8. Agricultural depredation from Canada geese does not appear to be an issue on lands adjacent to the Refuge.

9. We do not agree that the refuges mentioned are an analogous situation to Steigerwald Lake Refuge. They have substantially different purposes and a much larger land base for developing a compatible public use program. Further, Steigerwald Lake Refuge is not fully acquired.

10. In the final CCP (Appendix E), we have reevaluated the potential for opening Steigerwald Lake Refuge to waterfowl hunting within an expanded study area. We determined the current Refuge land base is too small to support a hunting program and meet Refuge purposes. We have added a new objective to the plan to reanalyze the suitability of waterfowl hunting and other public use opportunities at the Refuge should the Service acquire sufficient management interests in land adjacent to the current boundary. This objective is also stated in the Refuge's Land Protection Plan.



P.O. BOX 809/BATTLE GROUND, WA 98604

September 13, 2004

Ridgefield NWR Complex  
P.O. Box 457  
Ridgefield, WA 98642

RE: Response to the Draft Comprehensive Conservation Plan and Environmental Impact Statement, (CCP/EA), for Steigerwald Lake, Franz Lake, And Pierce Refuges under the management of the Ridgefield NWR Complex.

The Washington Waterfowl Association, Lower Columbia Chapter(WWALC), strongly protests the summary dismissal of waterfowl hunting in your draft proposal dated August, 2004. Irrelevant studies questionable arguments and assumptions are presented to propose total banishment of waterfowl hunting on these refuges. We are convinced that hunting is not only viable but mandated by the policies being promoted in Washington DC by the U.S.F.W.S.

The draft appears to be constructed with a predetermined decision to prohibit hunting building a case to support that conclusion after the fact.

**FRANZ LAKE** – The issues brought up include bank erosion, boater safety and displacement of migrating swans. (3-59). Hunters make thousands of boat trips on the Columbia River each season. There are always risks when going afield. We do not believe the U.S.F.W.S. decision that the river is too dangerous to hunt is a viable argument. Hunters routinely hunt the banks of the Columbia River and its islands with no visible bank erosion damage. If erosion is a problem, do not attribute it to the hunter. Finally, the displacement of swans for a few hours 2 to 3 days a week will not create a legitimate threat to the swan population.

**STEIGERWALD LAKE** – Issue # 1- "Lack of Alternate Wetlands on the Refuge", and issue # 2, "Lack of Alternate Wetlands Off-Refuge, (E-11 and E-12). Waterfowl are able to adapt to what little hunting pressure they would receive. Again, 2 to 3 days a week for 6-8 hours a day absolutely does not permanently drive away waterfowl or cause a "sensitization of waterfowl" to the extent that their survival is jeopardized (E-10). Anyone who has spent time watching the waterfowl at the Ridgefield NWR River- S unit during hunt days knows that; 1) the birds come back in droves at dusk while picking up decoys, 2) birds quickly acclimate to the safe areas and will loaf in water not being hunted within 50-100 yards of the hunted area. Citing several studies not relevant to the actual hunting conditions is not valid. Experienced hunters know the birds at Steigerwald will react in a similar manner as at the Ridgefield NWR River-S unit!

The ducks returning to roost each evening to the Ridgefield NWR from a south-southeast direction and "unknown" forage area(E-12), is a great example of where Steigerwald

ducks would also forage. While Ridgefield is 25 miles down river of Steigerwald, it doesn't take too much imagination to realize they are feeding between the two refuges only from Steigerwald they would fly north-northwest with a comparable distance traveled!

We disagree that Blue Lake and Lacamas Lake be causally written off as viable alternative habitat (E-10) The lakes usage and boating pressure drops substantially once the weather becomes inclement in late fall coinciding with waterfowl migration. The Columbia River and Sandy River Delta are not being hunted heavily enough to prohibit use of that area by waterfowl either.

Issue # 3 – "Lack of Suitable Alternative Canada Goose Forage Sites", (E-12 and E-13). Claims of depredation by disbursement of geese do not stand up to close scrutiny of the land uses off refuge currently surrounding Steigerwald. Agriculture and farming are not dominant land uses in the Camas/Washougal area.

What we do have is an excellent opportunity to hunt non-dusky geese outside the dusky goose management boundaries yet accessible to a large population of hunters. With the severely restricted goose season in SW Washington due to the dusky goose, why not take this prime opportunity to offer more goose hunting? The social commentary predicting the demise of hunting over the next 20 years was quite interesting and revealing. (4-41). Is it any wonder that hunters would become discouraged and not purchase a license under the recent direction of the Ridgefield NWR Complex? The agency is systematically choking off access to prime waterfowl habitat that previously had been hunted.

The Ridgefield NWR opened in 1965. Its total acreage between the River S and Carty units was approximately 3000 acres. Since the mid-1980's the Ridgefield NWR complex has more than doubled in size. Acquiring approximately another 4,126 additional acres as follows; Pierce 329 acres, Steigerwald 1,049, Bachelor Island 1,610, Franz 552, Ridgeport Dairy 508, Campbell Lake 68 acres.

The net result of this tremendous increase of 138% has been the elimination of three blinds to accommodate the tour route built in 1999. Incredibly, no new hunting access has been forthcoming! This despite promises to hunt Bachelor Island when access was available, (bridge access open in 1999). Promises for provisions to compensate for hunting lost when the port sold Ridgeport Dairy to the Ridgefield NWR Complex were never made good. Meanwhile, the State of Washington is pleading with the U.S.F.W.S. to open additional hunting opportunities, (specifically mentioning Steigerwald), in a letter dated October 3, 2003 to the Director of the Agency.

This draft document reflects the pervasive anti-hunting climate at the Ridgefield NWR Complex by the manager since 1998. In 1999 there was an attempt to close goose hunting completely for the 2000/2001 seasons, (halted by political pressure created by hunter involvement), and it has gone downhill since that time.

7

As a recognized consumptive user group, hunters have been encouraged to bring their concerns, ideas and proposals to the CCP format for resolution and planning. In one meeting in March 2004 with Glen Frederick and Jim Clap and numerous phone calls beginning in February 2004, WWALC President Gene Teel has offered our input for this draft proposal. During this time the framers of this draft have expressed surprise to hear that anyone would want to hunt Steigerwald with so many other hunting opportunities available in the area. The preliminary (or is it?) draft does not encourage the hunting community that our impact or concerns are going to be sincerely evaluated and incorporated into the process.

Time and again as requests for more hunting opportunities are raised the hunter is given this mantra as stated in your draft conclusion "hunting would not achieve refuge purposes, goals, and objectives and would materially interfere with or detract from the fulfillment of refuge purposes"(E-13).

8

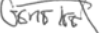
That's it in a nutshell, the hunter and hunting are considered a nuisance and "detraction" to the goals of the Ridgefield NWR Complex. Hunters are summarily dismissed at every attempt to enhance their usage of the refuge system. This does not have to be the final chapter. The story does not have to end this way. There is a change of leadership coming to the Ridgefield NWR complex. The hunting community is cautiously optimistic at the prospect of a fresh start.

The WWALC members and other hunters want to work with U.S.F.W.S. in a positive way to rebuild trust and encourage more volunteer involvement at the refuge. We have been working with the Ridgefield NWR manager Jennifer Brown to provide volunteers and we hope to increase involvement in the future.

Let's take another look at this draft proposal. Let's not eliminate yet another opportunity for hunters to have a place in the U.S.F.W.S. Refuge system.

Sincerely,

Gene Teel - President, WWA Lower Columbia Chapter



Doug Hargin - Sec/Treasurer



Cc: U.S. Rep. Brian Baird  
U.S.F.W.S. Director Steve Williams  
Forest Cameron  
Allen Thomas

### Service Response to the Washington Waterfowl Assoc.

1. The Service is mandated to support the six priority public uses for the Refuge System where the uses are compatible with refuge purposes and with the Refuge System mission. In the final CCP (Appendix E), we have reanalyzed opportunities for opening Steigerwald Lake Refuge to waterfowl hunting within an expanded study area. We determined the current refuge land base is too small to support a hunting program and meet Refuge purposes. We have added a new objective to the plan to reanalyze hunting opportunities on this Refuge should the Service acquire management interest in sufficient land adjacent to the current Refuge boundary. This objective is also stated in the Refuge's Land Protection Plan.

2. We have reanalyzed opportunities for opening Franz Lake Refuge to waterfowl hunting. As explained in Appendix E, we have determined the Refuge is too small to provide hunting and meet Refuge purposes. Further, providing the public with safe, reliable access to the Refuge is problematic. The existing road easement is restricted to administrative purposes, and boat access from the Columbia River during the waterfowl hunting season would be unreliable.

3. Potential disturbance from opening a waterfowl hunting program at Steigerwald Lake Refuge was reanalyzed in the final CCP. Providing a limited access, limited duration hunting program on current Refuge lands would impact approximately one-half of the Refuge's best wetland habitat. Due to the Refuge's small size and limited amount of sanctuary, waterfowl use of the Refuge would be measurably reduced on hunt days. Because the purpose for the Refuge is to mitigate for the loss of important waterfowl habitat along this stretch of the Columbia River, opening the Refuge to hunting without providing adequate sanctuary area would not achieve Refuge goals and objectives and would materially interfere with or detract from the fulfillment of Refuge purposes.

4. We have reanalyzed the potential effects of opening the Refuge to goose hunting. We agree that agricultural depredation from Canada geese does not appear to be an issue on lands in the vicinity of the Refuge.

5. For the reasons given in the detailed analysis of waterfowl hunting opportunities at Steigerwald Lake Refuge, the Service has decided not to open the Refuge to waterfowl hunting at this time, but will reconsider hunting should the Service acquire management interest in sufficient land adjacent to the Refuge's current east boundary.

6. The CCP does not predict the demise of hunting. The Interagency Committee for Outdoor Recreation (IAC) compiles a forecast of recreation resource demand for Washington State at roughly 10-year intervals. Hunting participation as a percent of total population is predicted to decline 15% over current levels in 10 years and decline 21% over current levels in 20 years. The primary source of data that IAC used was the National Survey on Recreation and the Environment. NSRE is widely regarded as the best estimate of future participation in outdoor recreation. Available acres of land for recreation is only one of several resource variables used in the predictions.

7. Starting with two public meetings and a planning update/newsletter in September 2000, the Service has conducted an extensive public involvement process for the CCP/EA. Hunting at Steigerwald Lake Refuge was not raised as an issue by the public prior to the establishment of the Lower Columbia chapter of the WWA in 2004. The issues and concerns we discussed with the chapter president at that time were incorporated into the detailed analysis of hunting opportunities and are clearly reflected in the final decision to reconsider opening the refuge to hunting should additional lands become available to support a hunting program in the future.

8. Since 2001, the Service has established more than 60 new hunting and fishing programs on National Wildlife Refuges across the country, bringing the number of units of the System currently open to hunting to 308. The Service is fully committed to reevaluating its decision to not open Steigerwald Lake Refuge to waterfowl hunting should sufficient land adjacent to the current east boundary of the Refuge become available for a compatible hunting program.



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**

DOUG SUTHERLAND  
Commissioner of Public Lands

September 17, 2004

Refuge Manager  
Ridgefield NWR Complex  
PO Box 457  
Ridgefield WA 98642

**SUBJECT: Comments on the Draft Comprehensive Conservation Plan and EA for the Columbia River Gorge Refuges**

The Washington Natural Heritage Program is responsible for maintaining information on the state's rare plant species as well as high-quality or rare native ecosystems. We've reviewed the Draft Comprehensive Conservation Plan for the Columbia River Gorge Refuges and have the following comments:

Page 4-19: "In 2003, the Washington State Department of Natural Resources designated the 976-acre Washougal Oaks Natural Resource Conservation Area and Natural Area Preserve". We recommend re-wording this paragraph for increased accuracy to: "In 2003, the Washington State Department of Natural Resources adopted the proposed boundary for a 976-acre Washougal Oaks Natural Resources Conservation Area and Natural Area Preserve."

Overall, the WA Natural Heritage Program supports either Alternative B or C in the Draft Conservation Plan for the Gorge Refuges.

Thank you for the opportunity to provide comments on the Draft Comprehensive Conservation Plan for the Columbia River Gorge Refuges. Please call me at (360) 902-1667 if you have any questions, or contact me by e-mail at [sandra.moody@wadnr.gov](mailto:sandra.moody@wadnr.gov).

Sincerely,

Sandy Swope Moody, Environmental Review Coordinator  
Washington Natural Heritage Program

Department of Natural Resources, Asset Management & Protection Division  
PO Box 47014, Olympia WA 98504-7014

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## Service Response to the Washington State Department of Natural Resources

Washington State Department of Natural Resources' comment and support are appreciated. Text was edited to reflect your suggestion.



United States  
Department of  
Agriculture

Forest  
Service

Columbia River Gorge  
National Scenic Area

902 Wasco Ave., Suite 200  
Hood River, OR 97031  
(541) 308-1733  
FAX (541) 386-1916

File Code: 1950  
Date: September 20, 2004

James R. Clapp  
Refuge Manager, Columbia River Gorge Refuges  
U.S. Fish and Wildlife Service  
P.O. Box 1136  
Washougal, WA 98671

Dear Jim:

The U.S. Forest Service has the following comments on the U.S. Fish and Wildlife Service's *Draft Comprehensive Conservation Plan and Environmental Assessment* for the Steigerwald Lake, Franz Lake, and Pierce National Wildlife Refuges (Gorge Refuges CCP/EA). First, let me compliment the U.S. Fish and Wildlife Service on a thorough and well-documented Plan for these Refuges. The Forest Service provides these comments as part of our responsibility to review federal projects in the Columbia River Gorge National Scenic Area (CRGNSA), per Section 14(d) of the CRGNSA Act. While this letter is not an official consistency review, our comments address potential areas of concern regarding consistency of the proposals outlined in the Gorge Refuges CCP/EA with the CRGNSA Management Plan. Following our comments concerning consistency with the CRGNSA Management Plan, I offer some comments as a sister federal land managing agency.

As mentioned above, the Forest Service is responsible to review federal projects in the CRGNSA for consistency with the Management Plan for the CRGNSA. The Gorge Refuges CCP/EA acknowledges this Forest Service responsibility on Page I-12, but I find the following sentence to be awkwardly worded: "The activities outlined in the Gorge Refuges CCP/EA, when reviewed by the Forest Service, will meet the requirements of the consistency review." I suggest the Final Gorge Refuges CCP/EA clearly state that the Gorge Refuges CCP/EA is a programmatic document, that specific projects will be developed after this plan is complete, and that the Forest Service will review these specific project proposals for consistency with the CRGNSA Management Plan.

The revisions to the Management Plan have been completed, and are in effect on federal lands as of August 2004. The discussion of plan revision on page I-11 can be changed to reflect the recent Plan Revision completion.

#### Allowed Uses

The CCP/EA alternatives outline a range of activities. New habitat enhancement/management activities, recreation/interpretation facilities, new signs, modification or removal of existing structures (e.g. dikes and water control structures) and road closure by diskings/recontouring/planting are all allowed uses in the respective CRGNSA land use designations, subject to review for protection of scenic, cultural, natural and recreational resources.



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James R. Clapp

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Research and monitoring (which do not involve new structures or ground disturbance), mosquito management, maintenance of existing structures (e.g. purple martin nest boxes), environmental education activities such as brochures and tours, recreation uses such as hunting, fishing, hiking, canoeing, and land acquisitions are all activities that are not regulated by the CRGNSA Management Plan. If any of these activities do involve new structures or ground disturbance (for example, placing new monitoring equipment), then those activities are subject to CRGNSA review.

An Open Space Plan is required in SMA Open Space before new land uses or developments take place. The CCP/EA meets SMA Open Space requirements for:

- A. Direction for resource protection, enhancement, and management.
- B. Review of existing uses to determine compatibility with Open Space values.
- C. Consultation with members of the public and with agency and resource specialists.

#### Scenic Resources

The Refuges are visible from a number of Key Viewing Areas, including but not limited to the Columbia River, SR14, Beacon Rock, and I-84. Page 5-4 of the CCP/EA notes that new land uses and developments must meet a visual standard "visual subordination". However, the higher "not visually evident" standard applies to the portions of the Pierce and Franz Lake Refuges that are designated SMA Open Space. The landscape setting for these Open Space areas is River Bottomlands and the combination of an SMA Open Space designation with a River Bottomlands landscape setting leads to the "not visually evident" standard. Site-specific analysis of detailed proposals will be necessary to determine whether the proposals meet the scenic standards and other scenic requirements of the CRGNSA Management Plan.

#### Cultural Resources

CCP/EA acknowledges on page 3-1 that cultural resource consultations and site-specific determinations will be completed for all projects approved in the CCP; this requirement is consistent with CRGNSA Management Plan requirements.

#### Natural Resources

The CCP/EA alternatives provide an array of habitat enhancement options, providing varying amounts of different habitat types. We do not provide comment on a preferred balance of habitat types, as enhancement of all of these habitat types would be consistent with the CRGNSA Management Plan (subject to resource protection standards). However, we do raise concerns with Draft Alternative C's proposal to reduce emergent wetland and open water habitat and replace it with what appears to be reed canary grass (Figure 3-9). The Draft CCP/EA acknowledges on page 5-22 that in Alternative C "removing impoundments on Pierce refuge would reduce or eliminate pond turtle..." and again on page 5-25 that in Alternative C the "loss of open water and permanent wetlands would be detrimental to turtles (pond and painted)." Western pond turtles are a species protected by the CRGNSA Management Plan.

The recently revised CRGNSA Management Plan would allow filling or draining of wetlands only in the following circumstances:

James R. Clapp

Page 3

- 8
- Filling and draining of wetlands shall be prohibited with exceptions related to public safety or restoration/enhancement activities as permitted when all of the following criteria have been met:
    - (a) A documented public safety hazard exists or a restoration/ enhancement project exists that would benefit the public and is corrected or achieved only by impacting the wetland in question, and
    - (b) Impacts to the wetland must be the last possible documented alternative in fixing the public safety concern or completing the restoration/ enhancement project, and
    - (c) The proposed project minimizes the impacts to the wetland.
  - Unavoidable impacts to wetlands and aquatic and riparian areas and their buffer zones shall be offset by deliberate restoration and enhancement or creation (wetlands only) measures as required by the completion of a mitigation plan.

- 9
- We point these guidelines out in order that the USFWS is aware of the CRGNSA Management Plan requirements should Alternative C become the preferred alternative for Pierce Refuge.

#### Recreation Resources

- 10
- The proposed recreation facilities are allowed in the respective land use designations, subject to the Recreation Intensity Class (RIC) guidelines and resource protection guidelines. The RIC guidelines set parking capacities and types of allowed recreation facilities.

#### Next Steps

- 11
- When the Gorge Refuges CCP/EA is finalized, my staff would be available to work with your staff to explore possibilities to streamline the federal consistency review process. Perhaps a number of projects could be reviewed under single applications. The proposed guided kayak and canoe tour of Franz Lake proposed in Alternatives B and C would require a special use permit from the Forest Service if it originates at the St. Cloud recreation site. As a fellow federal land manager in the CRGNSA, there may be opportunities for partnerships between our agencies in vegetation management at Franz Lake Refuge and our St Cloud and Sams Walker sites. There also appear to be opportunities for our agencies to partner in education/interpretation activities. The Forest Service will continue to support the Steigerwald Lake dike trail as a component of the Washougal to Stevenson Trail.

- 12
- Last, given the September 18, 2004 comment deadline date falls on a Saturday, thank you for allowing us to submit comments on Monday September 20, 2004.

- 14
- Sincerely,



DANIEL T. HARKENRIDER  
Area Manager

### Service Response to USDA Forest Service

1. The CCP is not entirely a programmatic document but contains a variety of specific and conceptual projects. We have replaced the sentence referenced with the following statement: Full implementation of the CCP will require the Service to submit specific project proposals for consistency review, where such projects are subject to provisions of the Scenic Area Act.

2. The discussion has been updated.

3. Comment noted. See also response to comment #1 above.

4. Comment noted.

5. Comment noted. We have added an explanation of the visual standard to Chapter 1.

6. Comment noted.

7. The anticipated changes in wetland acres and plant composition would be the result of decreasing habitat for nonnative bullfrog and fish, which directly impact western pond turtle and other native species. However, due to concerns for the potential impacts from reducing the amount of aquatic habitat for native species, we have determined that Alternative B would be preferred over Alternative C. Existing wetland impoundments will not be removed but will be improved or enhanced to benefit a variety of native plants and animals.

8. The alternative selected for implementation (Alternative B) will not result in filling or draining of wetlands.



9. See responses #7 and #8.

10. Comment noted.

11. Upon further review, we have determined the kayak and canoe tours are not feasible due to physical obstructions in the stream channel leading into the Refuge.

12. We appreciate your offer to assist the Service in implementing the CCP. We have identified these and other partnership opportunities for the Service to pursue with its partners in the plan.

13. Comment noted, and thank you for your support.

14. The comment period announced in the Federal Register ended on September 20. Thank you for your thoughtful and timely comments.