

## APPENDIX L. PUBLIC COMMENTS ON THE DRAFT CCP/EA

The Refuge received nearly a hundred written communications in response to the Draft CCP/EA. Sixteen letters, twenty-four emails, and fifty-four forms (provided in the Planning Update that announced the release of the Draft CCP/EA) were received. In addition a petition was received, signed by numerous individuals (some of whom also submitted comments separately).

Comments are summarized below by topic, and are sometimes grouped, where several individuals submitted similar comments. Bold type indicates the comment, which is often quoted directly but sometimes paraphrased. The code following the comment indicates the identifier that was assigned to each letter, email, or form. The Service response is in italics. Topics addressed and page numbers where the comments and responses start can be found as listed in Table L-1.

**Table L-1. Where to Find Specific Comments and Service Responses**

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## OVERALL SUPPORT FOR ALTERNATIVES

If a commenter indicated support for a particular alternative overall, it was tallied. The results of the overall support are summarized in the following table.

**Table L-2. Distribution of public comment specifying support for a particular alternative**

Alternative	Number of letters, emails or comment forms received indicating support for this Alternative overall
Alt 1	26
Alt. 2	5
Alt. 3	35
Alt. 4	10
Alt. 3 or Alt. 4	1
Alt. 1, modified	petition

### HABITAT MANAGEMENT

Several comments were received addressing habitat management issues. The CCP adopts the 1999 approved Habitat Management Plan which addresses the habitat management direction being implemented on the Refuge today. See the Habitat Management Plan and Fire Management Plan Summaries in Appendix B and C for more details.

**Support restoration to increase number of ponds and sloughs for migratory waterfowl. Need to determine why number of greater Canadian geese using the Refuge for resting and nesting continues to decline. (EM8)**

*RESPONSE: Wetland restoration support comment noted. Numbers of Canada Geese nesting on the Refuge has always been highly variable and correlated with wet and dry climate cycles. The trend over the past 15 years, however, has been increasing. Through most of the 1970's and 80's Refuge Canada goose breeding populations did not exceed 50 pairs annually. In the early 90's annual goose pair numbers showed a slight increase and averaged 55. Over the past 5 years this average has more than doubled to 117 pairs.*

**Service burns wrong time of yr, kills too many trees, does not clean up afterwards. (F23)**

*RESPONSE: The historic natural burning period for ponderosa pine is during late summer and early fall. Burning during this time coincides with the onset of plant dormancy and the low point in fuel moistures assuring that much of the fuel accumulation is reduced. The Refuge recognizes that nearly a century of fire suppression in this area has allowed for the unnatural accumulation of woody debris and litter. This high fuel loading can result in conditions supporting catastrophic wildfires threatening resources and facilities on the Refuge and adjacent property. This high fuel loading can also result in extensive tree damage if the first round of prescribed burning is conducted during the natural burning period. The Refuge has burned during this time period with a mixture of results, some of which were unacceptable. The current forest*

restoration strategy adopted by the Refuge includes thinning to remove dense thickets of young pine and to open the forest canopy, piling and burning of slash in winter, spring under-burning to remove a portion of the fuel accumulation, and finally a fall under-burn to achieve near natural conditions. These steps could take several years to complete, thus the unfinished appearance in any one unit. Once the unit is finished with the above restoration strategy it will look “cleaned up” and blend with the natural landscape. Units restored using these techniques are well within the natural range of conditions for the Ponderosa Pine Forest Type given the age distribution of trees in refuge forest stands. Subsequent burning in the fall on a 10-15 year rotation should maintain healthy forest for native plants and wildlife.

**What funds and/or assistance is available for private landowners for fire prevention, forest stewardship, maintaining and improving wildlife habitat, preserving wetlands and protecting groundwater resources? (EM11)**

*RESPONSE: These funds vary annually with Congressional appropriations. In recent years there have been funds made available to the public living in the wildland urban interface to reduce wildfire hazards around their homes. Neighbors close to the Refuge can receive some funding from the Refuge annually for this purpose. Those further away can apply for grants through the U.S. Forest Service. These grants are available for reducing hazardous fuels around home sites and in forested areas within the wildland urban interface. Several Refuge neighbors have benefited from these grants in the past three years. Other programs are available from the Natural Resources Conservation Service for programs such as the Wetland Reserve Program (WRP) and the Conservation Reserve Program (CRP). The WRP is a voluntary program offering landowners the opportunity to protect, restore and enhance wetlands on their property. The CRP program provides technical and financial assistance to eligible farmers and ranchers to address soil, water, and related natural resource concerns on their lands in an environmentally beneficial and cost-effective manner. The U.S. Fish and Wildlife Service, through its Partners For Fish and Wildlife program, provides technical and financial assistance to private landowners to voluntarily restore wetlands and other habitat on their land. Another program is the U.S. Department of the Interior’s Cooperative Conservation Initiative (CCI) which allocates matching funds for resource conservation projects implemented by partnerships of private citizens and public agencies. There are also federal tax laws that provide incentives to landowners who protect their land from development through conservation easements. The Intermountain West Joint Venture also offers opportunities through partnerships in North American Wetlands Conservation Act (NAWCA) grants to protect restore and enhance habitats.*

**Refuge has too many weeds. (F23, F29, L16) Landowner’s property NE of Refuge takes all wind blown weed seed. (PM7) Noxious weeds on Refuge blow over to property owner’s lands and the County fines them. (F19)**

*RESPONSE: The U.S. Fish & Wildlife Service recognizes that noxious weeds are a serious problem and the Refuge staff works each year to control the spread of these species. Refuge staff members use an integrated pest management approach. Weeds are controlled through chemical applications, release of biological control agents, mechanical pulling and mowing. Exotic plants that we attempt to control are Canada thistle, knapweed, leafy spurge and reed canary grass. The Refuge staff is mapping weed concentrations with GPS and monitoring these to track*

*their spread or reduction over time. Much of our control efforts focus on roadsides, public use facilities and border areas. Refuge staff works closely with the County Weed Board to identify and control high priority infestations. The Refuge staff is actively applying the most current control strategies available to infestations of all Class A and B designate species on an annual basis. If there are specific areas on the Refuge that adjacent landowners feel are contributing to weed problems on their property, then they have the opportunity to contact the Refuge manager and arrange for a site visit to map the problem area and discuss potential control strategies.*

**Refuge serves as model of good management for wetlands and uplands for wildlife. (L9)**

*RESPONSE: It is our plan to manage refuge habitats for wildlife with the best management practices available. Continual monitoring of those practices gives us the opportunity to review and adjust management strategies as we go along. See Refuge Habitat Management Plan Summary in Appendix B for more details.*

**CCP should ban trapping, new roads, grazing, logging, mining, or drilling, all two stroke vehicles, prescribed burning and using herbicides. (EM2)**

*RESPONSE: There are no provisions in the CCP to allow trapping on the Refuge. No new roads are proposed under the CCP. Habitat management practices that entail prescriptions for grazing or logging require compatibility determinations. The Refuge Manager at Turnbull NWR has found that prescription grazing for wildlife management purposes is compatible with certain stipulations and it may or may not be used in the future to help manage reed canarygrass. Logging for the purpose of hazardous fuel reduction and forest health to provide improved forest habitat has been found compatible with stipulations at Turnbull NWR and is discussed in the approved Habitat Management Plan. Logging and grazing solely for economic benefit are not compatible uses on the Refuge. See compatibility determinations listed in Appendix E of this document for further discussion. Gas, oil and mineral rights were not purchased with all refuge lands within the National Wildlife Refuge System and are subject to restrictions on the purchase deeds. Some of the tracts purchased within Turnbull NWR have mineral right reservations listed on the deeds. Off-road vehicle use is not allowed at anytime of the year. There are no restrictions on the use of two-stroke street legal vehicles on the public use roads. Prescribed fire and herbicides are both irreplaceable management tools on most wildlife refuges. With 10,000 acres of fire-dependent ponderosa pine forest at Turnbull Refuge, we utilize prescribed fire to simulate the natural low intensity fire that occurred at an estimated 10 year interval in the area. Herbicide is one of several tools used to protect the native diversity of the Refuge by controlling invasive exotic weeds. For some weeds there are no viable alternatives to the use of chemicals.*

**Support stable source of funding for Refuge habitat improvement (L10). Support full funding for research project and monitoring of Refuge wildlife, plants, and habitat relating for Refuge management. (L11, L14)**

*RESPONSE: Currently habitat improvements are provided for with grant or special project funds. There is no dependable annual source of funds to deal with wetland or upland habitat improvement projects such as control of reed canarygrass and other exotic plants, forest and*

*riparian habitat restoration and improvements. The CCP calls for additional support for research and monitoring of refuge wildlife and habitat through the addition of a second wildlife biologist and seasonal biological technician.*

## **NON-CONSUMPTIVE PUBLIC USE PROGRAMS**

### **Environmental Education**

The proposed increases and improvements in the environmental education program were supported by the vast majority of respondents who mentioned this program. Twenty-two respondents supported all or parts of an expanded environmental education program as described under Preferred Alternative 3 of the Draft CCP/EA (EM3, EM14, EM16, EM22, EM24, L1, L2, L9, L10, L11, L13, L14, F4, F6, F15, F16, F17, F25, F27, F35, F39, F40). Some of the reasons expressed included:

- **Education programs are very important (F40)**
- **Education center will be a fantastic learning environment. (F6)**
- **Stability in funding. (F25)**
- **Imperative that we educate our young people about wildlife, the environment and the interconnections. (F25)**
- **Desire for permanent staffing (L11, F35, F40) or increased staffing. (EM3, EM14)**
- **Increase in environmental education programs. (F17, F25, L1, L2, L10, L13, EM14, EM16)**
- **Full funding for environmental education. (F39, EM22)**
- **Increased classroom space (L14, L11, L10); and improvement in the program. (L9)**
- **Refuge is an important learning environment for urban children. (F39)**
- **Addresses Inland Northwest Wildlife Council goal of improving and expanding environmental education opportunities. (L1)**
- **Plenty of demand in the Cheney-Spokane area for a year-round EE specialist and off-Refuge programs in schools. (L10)**
- **Staffed visitor centers are a wonderful feature – an adjunct to an education program and a ready source of information about the refuge. (L10)**

*RESPONSE: There is a huge demand for environmental education from the greater Spokane area and other communities throughout Eastern Washington. The demand has always exceeded the current Refuge staffing and funds and we regularly turn away requests due to staff limitations. The current education program is facilitated by volunteers directed by a volunteer coordinator. The program would benefit tremendously if there were permanently funded staff that could carry the program over season to season, year to year. The current program requires annual if not monthly and quarterly orientation and training of volunteers. The addition of a permanent EE specialist and increased classroom space will allow the Refuge staff to provide additional environmental education opportunities to schools in the Spokane area and be better able to meet the demands of the community.*

**Support increasing environmental education but concerned that an expanded program might divert resources from wildlife and habitat conservation. (EM14, EM16)**

*RESPONSE: Wildlife is always the first priority on National Wildlife Refuges. The National Wildlife Refuge System Administration Act, as amended, states that the Secretary shall provide for the conservation of fish, wildlife and plants, and their habitats within the System as well as ensure that the biological integrity, diversity, and environmental health of the System is maintained. Through the NWRS Improvement Act of 1997 (which amended the NWRS Administration Act of 1966), the U.S. Congress directed the FWS to grant six wildlife-dependent public uses special consideration in the planning for, management of, and establishment and expansion of units of the National Wildlife Refuge System. The six priority public uses are to be considered after taking care of the needs of wildlife. All uses have to meet a compatibility standard. If a use increased to a point it was no longer compatible with the purposes for which the Refuge was established, the use would have to be reduced or eliminated.*

**I do not want the environmental education expanded nor any more concrete buildings taking over refuges. I do not want greater numbers of students trooping into these areas. We need to get people outdoors, not into concrete buildings. (EM2).**

*RESPONSE: Environmental education is one of the six priority public uses identified for special consideration in National Wildlife Refuge System Administration Act, as amended. Environmental education has been found to be compatible with the purpose of Turnbull NWR and will be kept limited to specific areas of the Public Use Area and the Turnbull Lab for Ecological Studies. All uses are monitored on the Refuge and through adaptive management can have added stipulations or be reduced or eliminated should habitat or wildlife disturbance reach a level that would be incompatible. Under the CCP, all visitors will be restricted to trails only. Student use will be restricted to trails and specific environmental education sites. Less than one hour of the students average four hour field trip is spent inside the environmental education classroom. Most of the student's time on the Refuge is associated with outdoor activities.*

### **Hiking**

Most respondents who commented on hiking and pedestrian trails supported the expansion of trails as envisioned under Preferred Alternative 3 of the Draft CCP/EA. (EM3, EM18, F4, F6, F15, F16, F27, L2, L9, L11, L13). Some of the reasons cited by the respondents included:

- **When we work the store on weekends, most people are asking about trails, how long they are, where they are, and there are some who ask about biking. The public we talk with is definitely interested in more trails. (F25)**
- **Turnbull is an inexpensive getaway and an increase in pedestrian trails would allow a wider wildlife experience. (L13)**
- **Really like the extension of loop trails. (F6)**

**We support an increase in pedestrian trails, with more signage to educate users. However, we are opposed to all off-trail public use by individuals or groups, except as needed for projects under the direct supervision of Refuge staff. (L11)**

*RESPONSE: Under the CCP, visitors will be restricted to trails only. The CCP also calls for interpretive signs at various observation points and trails to enhance the visitors understanding of the habitat and wildlife in the area.*

**Two respondents questioned whether the public really wants increased trails and questioned whether the Service has sufficient resources to enforce no off-trail use (EM14, EM16).**

*RESPONSE: Under the CCP, the Service will enforce no off-trail use in the public use area. The CCP calls for the addition of a full time law enforcement officer for the Refuge.*

### Access

**Support increased access. (F36) More access for hiking, driving, educational efforts. (F4)**

*RESPONSE: The CCP will add 390 acres to the currently designated Public Use Area and will add seasonally the 5000+ acres of the proposed hunting area.*

**Provide access on the east side of Refuge from Cheney Spangle Road. (EM3)**

*RESPONSE: Because of the requirement to collect entrance fees we have not developed a public access on the east side of the Refuge. Creating a second fee station at Gate 19 could be a future consideration.*

### Wildlife Viewing, Photography and Interpretation

Several people wrote in supporting improvements and increases in viewpoints and photo blinds and/or the proposal to include interpretive signs at most or all of the viewpoints. (L9, L11, L13, L14). Other specific comments and responses follow:

**Viewpoints (wetland) off Cheney-Spangle Road should be developed. (EM3)**

*RESPONSE: There is one viewpoint proposed along Cheney-Spangle Road.*

**Include Native American and early settlement history with wildlife for kiosks and brochures. This would provide friendly connection with the “old timers”. (EM3)**

*RESPONSE: Our existing Interpretive Prospectus proposes providing historical interpretive panels as well as natural history and management interpretive panels within the public use area.*

**Suggest showcasing elk and waterfowl viewing, interpretation, and photography. (EM12)**

*RESPONSE: Our Interpretive Prospectus calls for interpretive panels about wildlife on the Refuge which would include waterfowl and elk. We can add to our discussions of elk and waterfowl in our environmental education program.*

**Would like tour of Native American and early settler’s historic use of Refuge area. (L4)**

*RESPONSE: Refuge staff often accommodates special requests for tours of the Refuge. A tour highlighting historic uses of the Refuge could be arranged.*

## **Bicycle Trails**

The idea of establishing bike trails was mostly favored by the public who responded. Approximately ten of the comments received favored the idea of designated bike trails (EM3, EM18, F4, F6, F15, F16, F27, F35, L11, L14) while comments received from four opposed this idea (EM14, EM 16, EM 19, F5). More specific comments and responses follow:

**Two connections to Columbia Plateau Trail would be much better. A loop trip through the Refuge is a much more stimulating challenge. This fits in with the goals of Cheney to develop as a gateway community to Turnbull and the extensive trail system that is present and will be developed in the next few years. Connection to the Centennial Trail and the proposed cross-state trail (State Parks project) will tie Turnbull into the system and make the Refuge an even more important part of the community. (EM3) Extending trail down Cheney Spangle Rd. to Kepple Lake is the best idea. Cheney Plaza Rd. trail might go unused due to mostly mountain bikes on Plateau trail at that junction. (F27)**

*RESPONSE: Because of the requirement to collect entrance fees we have not developed a public access on the east side of the Refuge. Creating a second fee station at Gate 19 could be a future consideration. Alternative 4 in the Draft CCP/EA included a proposal to extend the bicycle trail as a loop down the Cheney Plaza Road around the auto tour route and out Gate 19 to Cheney Spangle Road. This would have necessitated creating a public entrance there that would require an entrance fee station and public gate system similar to what exists at the entrance on Smith Road. Creating a trail system adjacent to the Cheney Plaza Road will be easier as most of the land along that route is within the Refuge. The plan is to use the old county highway as much as possible and where it no longer exists, use the county road right of way. Cheney Plaza Road is used extensively at the time by bicyclists accessing the Refuge or points south.*

**I do not support expanded bike trails; this is purely recreational. Refuges must focus on their primary goal, not become parks. (EM14)**

*RESPONSE: The purpose of the trail is to provide access to the Refuge public use area to view and enjoy wildlife and wildlands by bicycle and not for the purely recreational aspect of bicycling.*

**Providing bicycle trails would have negative impacts on wildlife. (EM16)**

*RESPONSE: Pedestrians, bicyclists, and motorists all have some negative impact on wildlife. However, these are the preferred forms of travel by most visitors. A bicycle trail alongside the Cheney-Plaza Road will provide a safe path for bicyclists already accessing the Refuge.*

**Oppose increased bike trails in a region that has many bike trails. (EM19)**

*RESPONSE: The proposed bicycle trail will not create a new use. Bicyclists are already pedaling to the Refuge from Cheney using the Cheney Plaza Road which has no bike lane or safe shoulder. Using the old Cheney Plaza road bed and creating a bike lane on some portions of the existing highway (where the old highway no longer exists) will merely create a safe path for the*



bicyclist and assist bicycles to avoid vehicles using the highway. Creation of this bicycle trail will probably increase the number of bicyclists accessing the Refuge Public Use Area.

### **Public Use Area Size**

#### **Maintain Public Use Area Size as specified under Alternative 1. (EM14)**

*RESPONSE: Although actual acres delineated for the Public Use Area under the CCP will increase by 390 acres through the addition of the bike trail from the Columbia Plateau Trail and the addition of a trail out to Stubblefield Lake, users will also be required to stay on trails or roads and not venture off-trail. Under the current management situation (Alternative 1 in the Draft CCP/EA), visitors may come and go anywhere within the 2200 acre Public Use Area without restriction, which causes more impact to wildlife, not less.*

### **Miscellaneous Public Use Comments**

#### **There should be limited contact for people with wildlife. (PM1)**

*RESPONSE: By limiting visitors to trails only under the CCP (no more cross country hiking) the Service expects to reduce the potential for wildlife and habitat disturbance.*

#### **Consider campground facility to make Refuge more accessible from Spokane. (EM3)**

*RESPONSE: Camping is not a use that was considered under the CCP. Camping is not a wildlife-dependent public use. Turnbull NWR is only a 45 minute drive from Spokane and visitors from the Spokane area can easily make a day visit to the Refuge. Visitors from outside the Spokane area can find public camping facilities within an hour of the Refuge and private camping facilities within 15 minutes.*

#### **Concern Refuge becoming more of place for people than for wildlife. (L8)**

*RESPONSE: Wildlife will always be the first consideration on the Refuge. Public uses will be monitored to insure that habitat and wildlife disturbances do not become incompatible with the purposes for which the Refuge was established.*

#### **Support fishing (EM1). Support fishing catch and release program. (EM8)**

*RESPONSE: Since fishing is one of the six wildlife-dependent public uses identified for special consideration in National Wildlife Refuge System Administration Act, it received enhanced consideration during the development of alternatives. Historically most wetlands in the Refuge area were isolated from sources of native game fish as is the majority of the Palouse River subbasin in which the Refuge is situated. Palouse Falls on the Palouse River at the bottom of the subbasin and near its confluence with the Snake River constitutes an impassable barrier to fish migration especially for anadromous salmonids. The only native fish species that originally occurred in the Palouse Subbasin above the Palouse Falls were minnow-sized species of dace, shiners and sculpin. There were no native game fish. Several species of game fish have been*

*and continue to be planted in various water bodies within the Palouse sub-basin. Some plantings even occurred in the past on the Refuge in the Pine Creek Drainage and Stubblefield Lake. These plantings included rainbow and eastern brook trout. A recent inventory of refuge fish populations found that introduced game fish currently occur only in Pine Creek below Cheever Lake Dam. This half-mile reach of Pine Creek within the Refuge supports self-sustaining populations of rainbow trout and rare occurrences of smallmouth bass and kokanee that originated from introductions downstream in Chapman Lake. The fishless nature of the majority of the Refuge water bodies results in aquatic ecosystems with an abundance of invertebrate species that provide food for waterfowl, other water birds and several native amphibian species. Introduction of game fish and management for sustainable harvest would significantly impact the Refuge's aquatic ecosystems resulting in unnatural conditions that would impact much of the wetland-dependent wildlife on the Refuge. In addition, most of the wetlands on the Refuge are shallow and supported only by annual runoff from precipitation and snow. These wetlands dry out periodically and would not support a fishery. There are at least eight lakes within 10 miles of the Refuge that support public fishing so there is no lack of opportunity for fishing in this area.*

## **HUNTING**

### **Hunting in General**

(Note: the summary of comments focusing specifically on the proposed elk and waterfowl hunts are summarized in those sub-sections below).

The proposal to initiate hunting at Turnbull Refuge elicited a great deal of comment. Several people wrote in with comments supportive of hunting in general (F1, F9, F28, EM1, EM4, L1, L5, L7). Some of the reasons expressed for the support included:

- **Nothing wrong with allowing regulated hunting to control populations. (EM1)**
- **Regulated and controlled hunting for the general public. (F28)**
- **Hunting needs to be an available management tool. Hunters can control population numbers at minimal cost while actually infusing local and state economies with needed funds. (EM4)**
- **Will increase hunter support for Turnbull. (L1, L7)**

Several people providing comment wrote in opposing hunting (F5, F16, F30, F31, EM2, EM3, F37). Some of the reasons expressed by those opposing hunting on the refuge included:

- **Hunter killers have taken to hiding the horror of what they do. They use “harvest” as if they planted the wildlife. (EM2)**
- **If a hunt is allowed there will be a major loss of public support for the Refuge. (EM3)**

*RESPONSE: Hunting is one of the 6 priority public uses identified for special consideration in National Wildlife Refuge System Administration Act. These priority public uses are to receive enhanced consideration during refuge planning. Although hunting is a priority public use, it still must pass the compatibility test. Compatibility determinations were completed for the hunting programs and are included in the final CCP. These programs were found to be compatible with the Refuge purposes. The compatibility determinations specify required stipulations that*

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*minimize impacts to non-target wildlife species and habitats, minimize impacts to other priority public uses, and take into consideration public safety on the Refuge and off-refuge areas adjacent to the hunt units.*

Additional comments, suggestions, and concerns regarding hunting programs in general are addressed below.

**I was told that the original Refuge deeds stipulate no hunting. (EM14, EM23)**

*RESPONSE: All the deeds to current tracts within the Turnbull NWR were reviewed and we found no reservations in them that would restrict hunting on the Refuge. By law, 40% of refuge lands purchased with Migratory Duck Stamp Funds can be opened to hunting. This limitation on the other 60% ensures that there are still lands managed in a sanctuary status to allow migratory birds a resting/feeding area during the fall migration.*

**I hunt but I believe we need places where there is no hunting allowed. (F27)**

*RESPONSE: There will continue to be several areas on the Refuge where hunting will not be allowed (approximately 70%) to separate hunting from other public uses, to buffer roads and adjacent homes, and to allow undisturbed zones for wildlife.*

**I really think the term “refuge” is a misnomer since so many refuges allow hunting and, in some cases, even trapping. The public is led to believe that these are safe havens for animals when they are not. (F14)**

*RESPONSE: Turnbull Refuge will still provide sanctuary to many wildlife species throughout the year. The seasonal elk hunt will help reduce an enlarging herd that is adversely impacting habitats and other wildlife that use the Refuge. In nature there is usually a balance, a food chain based on predator and prey. In the case of the expanding elk herd there are no natural local predators keeping the herd in balance. Introducing humans as the hunter/predator will help bring back a balance to the ecosystem.*

**How many refuges allow hunting? (L5)**

*RESPONSE: More than 300 of the 545 national wildlife refuges have hunting programs.*

**Service should use hunting income to maintain the Refuge. (F1)**

*RESPONSE: Although the Service collects recreation use fees, the limited fees collected do not support maintenance needs on the Refuge. At the most the recreation user fees collected would support maintenance of hunting facilities and could go toward monitoring and policing the hunt. Should the State decide to raffle a specific bull tag for the hunt on Turnbull, the proceeds would go to the State as raffles are not permitted by law on National Wildlife Refuges. The State proposes that these proceeds could go toward annual big game surveys in this area.*

## **Elk Hunting**

About thirty letters were received specifically expressing support of elk hunting (F2, F3, F4, F14, F19, F20, F25, F27, EM5, EM6, EM7, EM8, EM9, EM10, EM12, EM17, EM18, EM22, PM4, PM6, PM7, PM11, L2, L5, L6, L9, L10, L15, L11, L14, L15). Some of the respondents were very enthusiastic about initiating an elk hunt and some of the reasons expressed in support included:

- **Hunting is an excellent way to maintain elk herd size. (F20)**
- **To minimize damage to the habitat (F25)**
- **Problems with over population have gone on too long. (EM4)**
- **Washington has a relative shortage of good elk hunting (F7)**
- **Currently most of the elk hunting in the area is on leased private land and not available to people without money and special connections. (EM9)**
- **Elk do impact aspen stands which support a disproportionate number of wildlife species, especially neo-tropical migratory birds. (EM14)**
- **It's a shame that for all these years this public property hasn't been managed with any consideration for the sportsman. (L5)**
- **Refuge elk hunting will distribute elk to make them available on surrounding lands. This will help address concerns related to crop and hay damage. (L15)**
- **WDFW advocates sustainable elk hunting on the Refuge because our agency promotes recreational hunting consistent with population conservation wherever we can. (EM12)**

However, a good deal of the support for elk hunting was highly qualified. Several people stated that they were generally opposed to any kind of hunting on wildlife refuges, but could support this hunt because it was designed to be limited and carefully controlled (F4, F14, F32).

Numerous others expressed support for a limited or controlled hunt for conservation purposes (F4, F25, EM4, EM10, EM17, PM6, L4, L7, L10, L11, L14, EM18, and EM22).

*RESPONSE: The elk hunt has been proposed in an attempt to reduce the herd size due to increasing habitat damage on the Refuge and depredation of crops on private lands adjacent the Refuge. Hunting and other wildlife-dependent uses receive enhanced consideration during planning for all National Wildlife Refuges.*

A few people stated in their comments that they were specifically opposed to elk hunting (L8, EM3). Reasons expressed included:

- **This should be a safe area for wildlife. (EM3)**

*RESPONSE: See responses above to comments on sanctuary status of refuges.*

Additional comments are addressed below:

**Concern that elk hunting on Refuge will move elk problem off Refuge, increasing trespassing, poaching, and elk grazing on private property. What caused elk herd to get out of control in last decade versus when there was cattle grazing (circa 1993)? (EM11)**

*RESPONSE: An expanded distribution of elk during the hunting season will likely occur when the Refuge is opened to hunting. Establishing a hunt program on the Refuge will keep elk from congregating on the Refuge during the hunting season which may cause private land owners to have to deal with elk and hunters more than they have in the past. We believe that if we can enhance the harvest of elk both on and off the Refuge and reduce the number of animals in the herd the problems associated with the elk herd should decrease, not increase over time. Although a Refuge hunt may result in some of the private land owners to have to deal with elk and hunters more than they have in the past, it will also increase potential harvest opportunities on private adjacent lands.*

**Several elk collared and monitored by the Coeur D’Alene Tribe migrating between Refuge and Reservation and shows importance of connectivity and habitat areas between the two land bases. Tribe wishes to continue cooperation with Refuge staff (L2)**

*RESPONSE: We are pleased to have partners monitoring and managing the elk in this area.*

**Allow hunting where elk are, rather than just in proposed designated areas. Elk would congregate in Pine Lake Drainage and make my problem worse for damage in the winter to my haystacks. (PM6)**

*RESPONSE: Although the Pine Creek Area is included as a hunting unit under the CCP, the CCP will expand the Public Use Area into the area southeast of Cheever Lake where elk had a tendency to congregate in the past. This increased pressure may cause elk to move off refuge during the day or seek new areas with less activity. Hopefully it will cause the elk to move into areas on private land during state elk seasons where additional harvest could occur. The option to open this area temporarily to permitted hunters could be explored if other public activities do not adequately redistribute elk. Elk hunting will not occur in or adjacent to the Public Use Area for safety reasons. We envision a hunt plan that is flexible so that management can adjust hunt area boundaries (within reason), seasons, and numbers of permits to adjust to the annual situation. We will be monitoring elk movement in the southeast portion of the Refuge.*

**Introduce wolves onto the Refuge. (F27) All the elk (you undercount as I’ve been told) need to be harvested more readily – they attract predators – you have wolves there don’t you? (F19)**

*RESPONSE: The Turnbull area does not presently have wolves and has not been identified in the gray wolf recovery plan for the Rocky Mountains. It would not be a likely location for reintroduction because of the high density of human development and lack of large contiguous areas of wilderness. The potential for serious human/wolf conflict in this area is too high.*

**What is the source of elk population estimates in CCP? Suggest changing “security cover” to “security zone” regarding Service jurisdiction over elk herd (EM12).**

*RESPONSE: The population estimates in the CCP were provided by biologists from the Washington Department of Fish and Wildlife. The term security zone will replace security cover in the final document.*

## **Management of Hunt Programs**

### **Prepare for poaching and hunter trespass problems (off season). (F27)**

*RESPONSE: The CCP calls for the addition of a full time refuge law enforcement officer.*

**All hunt methods should have opportunity. A good mix of bull and cow hunts should be used. (F27) Hunting opportunities on Refuge should be reserved for those whose limited abilities would preclude their hunting on other lands and by groups such as bow and arrow hunters. (L11, L14) Have a special season on the Refuge – also outside the Refuge at the same time. (F32) Give all licensed hunters with elk tags chance to draw. (PM4)**

*RESPONSE: All hunting options will be reviewed during the planning process for the step-down Turnbull NWR Hunt Plan. No matter what hunt program is finally selected all new programs/facilities on national wildlife refuges need to provide for accessibility.*

## **Use of Other Elk Management Tools**

### **Prefer using other elk management tools to hunting. (F16)**

*RESPONSE: Comment noted.*

### **Oppose using hormones suppressing reproduction to control elk population, want to avoid consuming harmful substances (L4)**

*RESPONSE: This is one of many options listed in the CCP. This is a relatively new technology that may have some applicability. The use of hormones to suppress reproduction of elk in this herd will be given consideration.*

### **Before elk hunting is permitted, Service should study archery, bioreproductive controls, and maximum translocation of elk to the nearby tribes who expressed interest (Spokane, Coeur D’Alene). (EM11)**

*RESPONSE: All tools available for managing the elk population will be further analyzed for cost effectiveness and given consideration.*

### **[Instead of hunting], open up selected areas to hikers, bikers, and equestrians during hunting season to help disperse the herds onto private lands where they will be hunted. Perhaps trap elk and move to tribal lands or other areas where they would be hunted. (EM3)**

*RESPONSE: Relocating elk is an option that is identified in the final CCP. Although hunting as a wildlife dependent priority use is to receive enhanced consideration in refuge public use planning, other herd reduction techniques can be employed. These other options may be necessary if a compatible hunting program is not reducing elk numbers enough to prevent habitat damage. The cost effectiveness of all herd reduction techniques would also be analyzed.*

**If elk were fed more on the Refuge in winter they would not stray off onto private lands and do damage to farmers' stacks. If bio-bullets are the answer, I don't mind that. (F21)**

*RESPONSE: Winter feeding programs could alleviate some crop damage off-refuge, but it would also have many negative side effects. Feeding programs are costly to manage even if volunteers are recruited for much of the labor. Artificially concentrating large populations of any wildlife species increases the risk of disease transmission and can also result in damage to other habitats that directly affects other wildlife species.*

**Talk of birth control of wild animal herds is idiotic and a warm fuzzy fantasy! (F7)**

*RESPONSE: Birth control is just another tool for managing expanding populations.*

**Oppose tools other than hunting to reduce elk numbers because other methods are costly and do not provide a priority public use under the RIA (EM19)**

*RESPONSE: Hunting has been identified as one of the ways that will be used under the CCP to reduce elk numbers because it is identified as a priority public use in the National Wildlife Refuge System Administration Act, as amended, and is likely the least costly strategy to implement. The other management tools identified may have application if the annual hunting program which is constrained by quality and safety issues fails to appreciably reduce elk numbers and damage to aspen.*

### **Waterfowl Hunting**

Public reaction to the proposed youth waterfowl hunt in Preferred Alternative 3 of the Draft CCP/EA was about evenly split. Some of those who supported the hunt (F12, F20, F25, F27, EM6, EM7, EM9, EM15, EM17, L9, L11, and L14) expressed the reasons listed below. However, some of the support was guarded (like the response to elk hunting); some respondents stated that they could support a youth hunt but opposed all other kind of waterfowl hunting (L11, L14).

- **Keeps an American tradition alive. (F20)**
- **Probably not harmful especially as you've listed it in conjunction with an educational program. (F25)**
- **Actual hunt should be short, one weekend per year. (F27)**
- **Many students don't have the time or financial opportunity to secure hunting access to private land. (EM9)**

*RESPONSE: Two alternatives in the Draft CCP/EA included waterfowl hunting. Under the CCP, the Service will provide a Youth Waterfowl hunt at Turnbull Refuge one weekend per year and will defer a regular season adult waterfowl hunt until a large fall wetland base can be restored. Turnbull Refuge staff has supported environmental education for youth for several years now and are willing to extend this education by offering a youth waterfowl hunt where parents can bring young hunters for an opportunity to learn about waterfowl natural history and waterfowl hunting techniques.*

About a dozen respondents wrote in opposing waterfowl hunting of any kind (F3, F4, F14, F22, EM11, EM14, EM16, EM18, PM4, L4, and L8). Some of the reasons expressed for the opposition included:

- **Contrary to mission of Refuge. (EM11)**
- **Waterfowl hunting contradicts one of the purposes of the Refuge – being an inviolate sanctuary for migratory birds. (F16)**
- **What few birds we have on the refuge anymore should be left in peace (F22)**
- **No justification for duck hunting. Duck numbers have been going down both on and off the Refuge for years. (EM3)**
- **Opposed unless needed for conservation purposes. (F4)**
- **No management basis for a hunt, (EM14, EM16)**
- **We are speaking out against any use of the Refuge that does not put wildlife first. (L8)**

*RESPONSE: Hunting is one of the public use priorities identified in National Wildlife Refuge System Administration and therefore must receive enhanced consideration during planning. The Refuge Administration Act also stipulates that a public use must be compatible with the Refuge purposes. A two-day youth waterfowl hunt utilizing a permit system and spaced blinds on Upper Turnbull Slough has been found compatible with refuge purposes (see Appendix E). Currently the Refuge supports the bulk of the fall migration in this area. Although a 2-day Youth hunt with restricted numbers will not impact bird use of this habitat, a larger scale hunt over the course of the State season would significantly decrease waterfowl use of the Refuge. Under the CCP, the Service decided to not open wetland areas on the Refuge to hunting during the regular season, unless and until more wetland habitat can be restored, because the Refuge habitat represents the majority of fall migration habitat in the area. In addition there was extremely low interest in opening the Refuge to waterfowl hunting expressed by the public during the scoping period.*

**The EA indicates that there has been a shift in waterfowl numbers to the west of TNWR. Why not address this issue first rather than devote scarce resources to a hunt? (EM16)**

*RESPONSE: The causes for the shift of waterfowl numbers to the west during the fall migration period is predominately a result of larger level landscape issues that cannot be resolved in the area encompassed by the Stewardship Area. Following the development of the Columbia Basin Project, the thousands of acres of “hot” foods (corn, soybeans, potatoes, etc.) that were developed using irrigation water from Coulee Dam, provided an abundant food source for migrating ducks. This new irrigation also created several thousand acres of wetlands associated with waste ways. The combination of wetlands and abundant food created optimum migration stopover habitat. The other landscape level change that contributed to the shift in fall flights to the west is the drainage of nearly 70% of the wetlands around the Refuge for pasture and cropland. This vast drainage effort had the greatest impact on fall wetland habitat reducing migration stopover habitat in this area. Through the Stewardship Area conservation programs included in the CCP, currently drained wetlands may be restored increasing the fall habitat base. This will likely result in an increase in fall waterfowl use of the area, but will not significantly shift the fall flight away from the Central Columbia Basin. The waterfowl hunt proposed under the CCP is only a 2-day youth hunt tied to the Refuge’s environmental education program. A longer hunt is not proposed at this time, but may be established in the future if the fall waterfowl habitat base is increased through conservation efforts.*



**Have a hunting blind and lottery system like at McNary NWR. (F12)**

*RESPONSE: We will review hunting facilities and programs on other national wildlife refuges and discuss hunting options with local WDFW staff while developing a hunt plan for Turnbull. The public will have opportunity to comment on proposals in the hunt plan.*

**Hunting of Other Species****Three people providing comments wrote in expressing their desire to see the Refuge open a deer hunt. (F2, L11, L14)**

*RESPONSE: Deer hunting was not offered in any of the alternatives in the Draft CCP/EA for several reasons. During our planning, deer hunting was not identified as an issue by staff nor was it identified as a need by the public during the scoping process. White-tailed deer populations are regulated at relatively low numbers by an endemic viral disease. Opening the Refuge to a deer hunt that overlaps with elk seasons could interfere with our program to reduce elk numbers on the Refuge. If we were to offer deer hunting, elk hunter numbers would have to be reduced in order to preserve an overall hunting density that provides for a high quality and safe hunt.*

**Support turkey hunting and do not understand the delay. (EM9)**

*RESPONSE: Wild turkeys are a relatively new addition to the Refuge fauna. Very little is known about their population size, rate of growth, or their relationship to native wildlife and habitats on the Refuge. Future monitoring of this population and its impact on refuge habitats and wildlife will provide information for management decisions about whether or not to open a hunt.*

**How about opening the Refuge up for a general hunting season of other species but with limited access? (L6)**

*RESPONSE: See responses above regarding deer and turkey hunting. Also, there was an overall lack of support by the public during scoping. The elk hunt proposed addresses a management need as well as a recreational need.*

**LAND AND WATER PROTECTION**

The Service proposal to protect land and waters outside the existing Refuge boundary using a variety of strategies attracted a good deal of response. Thirty-one letters were received that contained commentary supporting the Service's reasoning for land protection and supporting the tools proposed in Preferred Alternative 3 of the Draft CCP/EA to protect land and waters. Some also supported the larger proposal outlined in Alternative 4 (see following page). (F2, F3, F4, F5, F9, F10, F13, F16, F20, F28, F35, F39, F40, EM3, EM8, EM13, EM14, EM15, EM16, EM18, EM20, EM24, PM4, PM14, L2, L3, L10, L11, L12, L14, L15) The following reasons were cited in support of the land protection concept and strategies:

- **No question that as houses spread throughout Spokane County, both habitats and corridors are threatened. Protection through fees, easements or agreements from willing sellers seems like a win-win proposition. (L10)**
- **Alternative 3 provides greater protection than now exists for the flora, fauna, water resources, wetlands and critical habitat such as Palouse steppe, ponderosa pine and aspen. By enlarging the Stewardship Area, the Refuge can have a significant positive effect on adjacent lands. (L9)**
- **We need to protect the water purity and guard against water shortage. (F35)**
- **To conserve Refuge water quality (L11, L14, F2, F35, F37, EM13, EM20, EM22)**
- **Preservation of water quality is vital to the protection of habitat for water species. (F39)**
- **Will help preserve wildlife habitat. (L11, L14, F2, F35, PM4, EM13, EM18, EM22)**
- **Loss of critical habitats in Eastern Washington is occurring at a rapid rate. (EM16, EM14)**
- **I hope that you aggressively pursue more habitats for plants and animals. I am very concerned about the race to development occurring in the Cheney area. (F13)**
- **I have been deplored by the devastation of our natural resources. We have lost far too many of these precious resources and cannot afford to go on suffering these depredations. (L12)**
- **I'd like to see habitat restoration and maintenance be the highest priority (EM19)**
- **Three of the habitats (Palouse Prairie, Ponderosa Pine, and Herbaceous Wetlands) found within the area studied are key to conservation efforts in Washington. The Washington State Conservation Strategy ranks each of these as Priority One, the highest priority for current conservation action in Washington. (EM13)**
- **Cooperation and partnerships with surrounding landowners makes obvious sense. (EM14, EM16)**
- **The local region lacks adequate public lands, especially in consideration of the rapidly expanding population. Adding lands now will be easier and cheaper than if we wait. (EM3)**

The Refuge received twenty-five letters and a petition opposing land protection conceptually or opposing the Stewardship Area as proposed under Preferred Alternative 3 of the Draft CCP/EA. (F18, F19, F21, F22, F23, F26, F29, F30, F32, F33, F34, F37, F38, EM11, PM2, PM3, PM5, PM7, PM8, PM9, PM10, PM11, L8, L16, L17, EM19). Some reasons included:

- **We understand your support for the bordering land but feel this is private property and should be left that way. (L8)**
- **Too much government ownership of land is not healthy for our country. (F32, F21)**
- **Refuge is big enough now. (F23, F24)**
- **Current size of Refuge is adequate to pursue the original purpose without disturbing existing homes or economic enterprises. (F18)**
- **I have seen a well-managed ranch with great grass for cattle turn to weeds and barren land under government ownership. (F26)**
- **I don't believe that more property would do the Refuge any good. (PM7)**

*RESPONSE: The neighbors within the Stewardship Area who oppose land protection efforts would be viewed as unwilling and there will be no expectation that they participate in any*

*program with the Refuge. Participation in a Stewardship Area concept will be entirely voluntary. Selling land to the U.S. Fish & Wildlife Service will be by willing seller only. The Service's biological reasoning for protection of additional lands surrounding the existing Refuge is sound and is presented in the CCP.*

**General Comments:**

**The Tribe takes great interest in the ecological integrity of the TNWR area as it is located within the Coeur D'Alene Tribe's Aboriginal Territory. The Tribe strongly supports the conservation actions outlined in the Draft CCP/EA that would encourage conservation within the Stewardship Area surrounding the Refuge. The Tribe believes that these types of management actions are crucial to restoration of the watershed as a whole. (L2)**

*RESPONSE: We will continue to work and consult with our Tribal partners on conservation issues of common interest on the Refuge.*

**I support protection of the maximum acreage identified under Alternative 4. (EM14, EM16). Alternative 4 is a very promising proposal. (EM13) Need to preserve more habitat. Would prefer Alt 4. (PM4) If we don't protect as much of the bugger zone and migratory corridors as possible, the quality of the refuge habitat will be eventually degraded for future generations. (F25)**

*RESPONSE: Under the CCP, the Service will work with willing sellers and landowners wishing to participate in voluntary conservation measures to protect habitat within the Stewardship area.*

**Service should establish green corridors for non-flying wildlife between Refuge and other semi-remote areas (Rock Lake, ID, Mica Peak) with State, county, or other entities. (EM3)**

*RESPONSE: Preserving wildlife corridors is one of the objectives of proposing a Stewardship area around Turnbull NWR.*

**We have had semi-drought conditions for years. As the population grows and more water is needed, who has priority? Would the Service pump water in for the Refuge? Would landowner well capping be voluntary or mandatory? (L3)**

*RESPONSE: There are no plans to pump water into the Refuge at this time. Groundwater pumping has been explored in the past, but the cost and potential impact to existing groundwater resources were too high to make it feasible. Well-capping or casing will be a totally voluntary program that would involve making payment to a landowner to case wells to prevent movement of shallow groundwater to the deep aquifer thereby lowering the ground table, or to discontinue use of a well. Pumping water onto the Refuge is not a feasible alternative during drought years. There are no regulatory aspects to anything proposed in the CCP.*

**Inland NW Land Trust requests the Service reevaluate their 15 parcels on Curtis Road as a single unit (INLT-DU Preserve) for suitability as Priority One lands for acquisition. We**

**own all 15 parcels as a single holding. They function together as wetlands, uplands, and wildlife habitat. (L3)**

*RESPONSE: The Service chose to adhere to its original process for determining priorities on individual parcels in the Land Protection Plan (Appendix A). The prioritization process was based on ecological scoring of parcels and their size. This did lead to some tracts that had been subdivided on paper being assigned a lower priority. Ultimately, the Service will use the priority system to identify those areas of most value for cooperative activities and/or acquisition but lower priority parcels can be considered for protection if there is mutual interest on the part of the Service and the landowner*

**I feel the Refuge should obtain as much fee ownership as possible (F3)**

*RESPONSE: Fee ownership is one of the tools used to conserve and protect lands in perpetuity. As funds are made available, fee title acquisition is a high priority. However, the Service will work with willing sellers only under the Service's Land Acquisition Policy (341 FW 1).*

**The Stewardship Area can best be described as a grandiose scheme. (F18)**

*RESPONSE: Throughout the National Wildlife Refuge System we are finding that refuges are increasingly isolated and squeezed by sprawl, housing and industrial development, minerals development and agriculture or other activities that put wildlife at risk. Water supplies are threatened. They are being surrounded by construction and highways and thus wildlife refuges are struggling to maintain suitable habitat for wildlife. With the ever growing human populations and their demand for resources our national wildlife refuges are being threatened from the outside. While the human population has increased by 75% since 1955, the amount of land covered by urban and suburban development is estimated to have increased by nearly 300%. The Stewardship Area identifies the area where surrounding land use practices will have the most influence on the future of this Refuge. For years private lands in large tracts outside the Refuge borders buffered the Refuge from development and also provided additional resources for many wild species. This could continue if landowners stay with the traditional land use practices (ranching). However, times are changing and land use is changing. If wildlife refuges are to succeed in their mission of conserving species, refuge neighbors can help by voluntarily making their adjacent lands safe for wildlife. These adjacent lands are the key to ensuring the future of America's wildlife. By identifying land stewardship as an important activity under the CCP, we are reaching out to our community and to our neighbors and encouraging voluntary land use practices that will enhance, not threaten, wildlife and wildlife habitats. Wild animals don't recognize refuge boundaries. By some estimates, private lands protect roughly one-half of the most important wildlife habitats in the United States. We encourage private landowners to get involved and make a commitment to conservation. As long as properties around a refuge remain in their natural state, refuges are less vulnerable to threats such as reduced water supply, and diminished water quality. The Stewardship Area concept identifies opportunity areas for the Refuge to help adjacent landowners conduct voluntary conservation practices. The CCP will expand the boundary of the existing Refuge through a Stewardship Area delineating the resources important to maintaining the biological integrity and environmental health of the existing refuge lands (watersheds, open space buffers and landscape*

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linkages). The goal of land protection within the Stewardship Area is to promote conservation of these resources by private landowners through voluntary programs. The size of the project and the success of these conservation programs are dependent on voluntary participation by landowners. The potential level of participation is currently unknown, but through outreach efforts we hope enough interest will be generated that a moderate amount of wildlife habitat will be protected and improved.

**Service will have hard time maintaining many small parcels of property scattered in large geographic area (PM6)**

*RESPONSE:* The Service recognizes the difficulty in managing widely dispersed parcels in a large geographic area. Wetland Management Districts in the Midwest often cover several counties with hundreds of small tracts. Although these districts present significant management challenges, they are the backbone of waterfowl habitat management within the National Wildlife Refuge System. In comparison, the Stewardship Area identified in the CCP is a relatively small geographic area. The parcel priority system developed for the Refuge Land Protection Plan, however, takes into account these challenges and places a higher priority on larger parcels and those adjacent to existing refuge lands.

**Service should recognize landowners who sell land to the Service by having a ceremony or through the naming of a lake, wetland, or trail (EM3)**

*RESPONSE:* We support this idea; we believe those who work in partnership to protect important wildlife on their private property should be recognized for their efforts. Several wetlands on the Refuge already host the names of past landowners. We hope they and their heirs are proud of this legacy. Many of the lakes on the Turnbull have been named after previous landowners, i.e. McDowell Lake, Turnbull Sloughs, Hale Lakes, Tritt Lakes etc. We believe this practice could be continued.

**Support additional land acquisition to the south but not to the west (EM8)**

*RESPONSE:* Land acquisition will be based upon priority habitat becoming available from willing sellers. Lands to the west contain important resources that, if acquired, could meaningfully increase water quality and add to the conservation of important wildlife habitat in this area.

**What impacts would there be on Historic Custom and Cultural practices? Have the required NEPA studies been conducted and what are the conclusions? (L16)**

*RESPONSE:* Consistent with NEPA implementing regulations, the Environmental Assessment evaluated potential impacts of the various alternatives outlined in the Draft CCP/EA on the “human environment” - that is, “the natural and physical environment and the relationship of people with that environment” (40 CFR 1508.14). The Environmental Assessment appropriately addressed economic and/or social effects interrelated to natural or physical environmental effects and concluded that impacts to the human environment are expected to be less than significant.

**Why must land be defined as within an expanded boundary in order to be purchased from a willing seller? (EM11)**

*RESPONSE: The Service has no authority to acquire land without an approved boundary. Likewise, lands cannot become part of the National Wildlife Refuge System unless they are within an approved refuge boundary. Should the Director approve a refuge boundary, then the Service has the authority to make offers to purchase land or enter into management agreements with willing landowners within the approved boundary.*

*Landowners within an approved refuge boundary can sell their land at any time to any buyer. They are not compelled to sell their lands to the Service. Landowners within a refuge boundary retain all the rights, privileges, and responsibilities of private land ownership including the rights to access, control trespass, sell to any party, and develop their properties, even if the Service has acquired interest in the surrounding land. Development of privately owned land continues to be subject to local regulations and land use zoning. The approved boundary has no regulatory effect on landowners.*

**As owners of 320 acres with 1<sup>st</sup> and 2<sup>nd</sup> order protection priority in the CCP, located a half-mile south of the Refuge, we suggest Service work with neighboring landowners to address natural resource management challenges, especially elk, forest health, and noxious weeds.**

*RESPONSE: Under the CCP, the U.S. Fish & Wildlife Service will develop an outreach program for local landowners that will provide technical assistance and linkages to existing wildlife and habitat incentive programs to assist with natural resource management of their lands. The primary goal of the Stewardship Zone is to work with willing refuge neighbors to achieve a common goal of maintaining healthy lands that not only meet the landowner's needs but provide habitat for native wildlife.*

**Expanding Refuge would cause more wildlife/human conflicts such as animal/vehicle collisions, wildlife straying into urban home areas, and crop damage. (L16)**

*RESPONSE: Although conditions are rapidly changing, the current landscape around the Refuge is providing habitat that supports populations of wildlife species that are also found on the Refuge. Addition of lands to the Refuge through purchases from willing sellers would not necessarily result in significant increases in wildlife. The exception may be waterfowl populations. If newly acquired lands have wetlands that could be restored, there is a potential to increase the habitat base for wetland-dependent species. The acquisition of lands could prevent the additional loss of habitat and wildlife in the area from potential development activities, helping maintain current wildlife populations.*

**How does the Service plan to address the encroachment from wildlife and the wildlife/human conflicts? If the Service plans are to increase wildlife numbers, there will be increased wildlife conflicts. If a private landowner does not wish to provide wildlife habitat, how does the Service plan to address any damage to private lands by wildlife? Health issues of disease transmitted to domestic herds by wildlife have not been addressed.**

**(i.e. Yellowstone buffalo infecting local herds) Does your agency have a plan in place to mitigate losses from disease transferred from wildlife to domestic herds? (L17)**

*RESPONSE: The CCP proposes strategies to reduce the elk herd such as opening the Refuge to hunting. It is our intent to work with the State Fish and Wildlife agency to come up with solutions for reducing the herd and thus reducing wildlife/human conflicts. We see the potential for waterfowl numbers to increase in the area if any additional wetland areas are restored, however we don't anticipate waterfowl/human conflicts. Waterfowl population problems can also be managed through hunting programs. Should a landowner have a depredation complaint due to wildlife impacts to their property they can address these through the State Department of Fish and Wildlife (resident game species). Should a landowner have a depredation complaint due to waterfowl or other migratory birds they can address that complaint through a USDA APHIS animal control agent. There is not a herd health issue such as brucellosis associated with the elk at Turnbull. There is no brucellosis in our area like that infecting the Yellowstone bison. The USFWS and State F&W are monitoring for Chronic Wasting Disease, which is also currently not in our area.*

### **Condemnation Concerns**

**Suggest Service provide more specific information to address concerns of condemnation. Concern about the taking of private property (EM11, L15) the Stewardship Area is a way of getting a Federal Foot in the door to facilitate a later "taking" of private property. (F18)**

*RESPONSE: The policy of the U.S. Fish and Wildlife Service is to work with "willing sellers only" in land acquisition, as described under the Service's Land Acquisition Policy (341 FW1). The Service has no intent or desire to condemn land in this area; there will be no taking of private property. Everything associated with the proposed Stewardship Area is voluntary. If landowners are not willing to participate in any land conservation actions they will not be compelled to do so. There is nothing regulatory about any of the land protection actions in the CCP. The intent of delineating a Stewardship Area is to identify an area around the Refuge where we believe focusing cooperative conservation activities will be most beneficial for protecting and enhancing wildlife and wildlife habitat. The use of the word stewardship is the acknowledgement that everyone owning land in the area is a steward of the land. Those willing to voluntarily work toward conservation and restoration of habitats within the area will be given technical assistance commensurate with available funding.*

**We understand the Service at this time would only acquire lands from willing sellers. Can you assure us that if all the land surrounding ours is acquired that the Service would not use eminent domain to "take" our land to complete a segment of wildlife habitat area? (L17)**

*RESPONSE: See above response.*

**Anyone who puts their property up for sale would be obligated to have it appraised by a refuge-designated appraiser, and the bid received would be significantly less than market value. (EM11)**

*RESPONSE: Highly qualified appraisers familiar with the local area are contracted by the Department of the Interior to prepare a fair market appraisal, based on stringent Federal appraisal standards. The appraiser makes an estimate of market value based on the highest and best use of the property and current market conditions. The appraiser looks at the value of similar property selling in the vicinity. By law, the Service's offer must be based on market value. The landowner can then make a decision whether to accept the offer or not.*

**If the program remains completely at the option of the property owner, then I can see a more positive outcome. (PM14)**

*RESPONSE: Any participation by a property owner is entirely voluntary thus the option is entirely theirs.*

**Since Fish and Wildlife wishes to establish a "stewardship area", does this mean Fish and Wildlife is to be steward of that property? Blacks Law Dictionary, 6<sup>th</sup> edition, defines property as "that, which belongs exclusively to one". More specifically, ownership: "the unrestricted and exclusive right to a thing." Blacks Law defines steward as "A man appointed in the place or stead of another". As owners we are already stewards of our land and as such are unwilling to designate any other person or agency as steward. You say that Fish and Wildlife will work only in an advisory capacity, but with the legal definition of "steward" control is implied. If the goal is only protection and enhancement of wildlife, a designated "stewardship area" is unnecessary; we reject any designation as such, evidenced by the 426 signatures presented to you this past summer. (L17)**

*RESPONSE: We chose to use the word stewardship in the widely used context of conservation stewardship. Any search of the term conservation stewardship on the internet will bring up many examples of the use of the term. Stewardship is about landowners wisely using, managing, protecting, or conserving the natural resources which have been entrusted to them or is rightfully theirs. By delineating a Stewardship Area around the Refuge we identified the resources important to maintaining the biological integrity and environmental health of this area. Within the Stewardship Area, it is our intent to provide technical assistance and information to interested landowners on existing wildlife and habitat incentive programs. For example, conservation efforts can be accomplished through voluntary landowner participation in such incentive programs as conservation easements, and the Wetlands Reserve Program. There is nothing regulatory about our proposals and we will make no attempt to control what a private landowner does with his or her property. Our use of the word stewardship is the acknowledgement that everyone owning land in the area is a steward of their land. Within the context of conservation, stewardship means conserving important ecosystems, such as effectively managing invasive alien species, fires, grazing or harvesting without damaging the land.*

### **Economic Concerns**

**Oppose land taken out of production (F19, F26)**

*RESPONSE: The Service is only interested in purchasing land from willing sellers. Those who are willing sellers either already have property on the market or soon will have. There is no*



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*guarantee that any future owner is going to continue agricultural activities on the property. The trend in land use has actually been to subdivide the property to the highest density allowed by zoning, and to sell the small parcels to homeowners. The resulting parcels are usually too small to permit any significant agricultural venture effectively taking it out of “production”.*

**How much in taxes will your expansion cost us? (L3)**

*RESPONSE: See response below. There should be no loss in revenue to the County.*

**Oppose land taken off tax rolls (F19, F23, and F26)**

*RESPONSE: The economic analysis provided in the Draft CCP/EA indicates that, if lands are acquired, there could be a reduction in tax revenue under the CCP when compared to what the county receives directly from landowners at present. However, overall the CCP would have a net positive economic effect in the county, which could partially or completely offset any direct loss of tax revenue.*

**Any decrease in property taxes will be more than offset by Refuge Revenue sharing revenues, the projected effects on employment and personal income, and the recreation benefits which will result. (EM13)**

*RESPONSE: See above response.*

**Costs for Alternatives 2, 3, and 4 are grossly underestimated. Projected land acquisition costs could easily triple or more. The Refuge should remain within existing boundaries, in part because of huge backlog of incomplete projects. (F18)**

*RESPONSE: The estimated costs of the alternatives presented in Appendix F of the Draft CCP/EA were based on best professional judgment at the time the Draft was written.*

**Has the USFWS conducted the required studies under the Regulatory Flexibility and Fairness Act? (L16)**

*RESPONSE: The Regulatory Flexibility Act (as amended by the Small Business Regulatory Enforcement Fairness Act) applies to rules published by federal agencies. The publication of the CCP does not constitute a rule and none of the proposed actions within the plan are regulatory in nature and thus do not necessitate studies under the Regulatory Flexibility and Fairness Act.*

**There will be impacts to small businesses from displacement of landowners. Citizens on petitions request copies of all studies showing impacts on local small businesses. (L16)**

*RESPONSE: An economic analysis was provided in the Draft CCP/EA that took into account multiplier effects (effects to businesses that might be affected by direct changes such as displacement of landowners). The analysis showed that implementation of Preferred Alternative 3 would have negative impacts on the local agricultural economy compared to keeping refuge management as is under Alternative 1 (Table 4-20). However, these effects would be far offset*

by the positive economic effects Alternative 3 would have on the local economy by additional recreational expenditures made by people using the additional trails and facilities under Alternative 3, and engaging in the hunting programs (Tables 4-18 and 4-19). Table 4-24 in the Draft CCP/EA, which summarizes the overall effects to employment and personal income, shows that Alternative 1 would result in only 165 jobs and about \$3 million in personal income, while Alternative 3 would result in 225 jobs and about 4.1 million in personal income. So, overall Alternative 3 was shown to have a more positive economic benefit to the community than Alternative 1.

Overall national wildlife refuges are economically beneficial to local communities. A report released by the USFWS in September 2005 titled "Banking on Nature 2004: The Economic Benefits to Local Communities of National Wildlife Refuges" can be found on the internet at <http://www.fws.gov/refuges/>. This report indicates that recreational use on national wildlife refuges nationwide generated almost \$1.4 billion in total economic activity during 2004. In 2004, 37 million people visited national wildlife refuges, creating almost 24,000 private sector jobs and producing \$454 million in employment income. Additionally, recreational spending on refuges generated nearly \$141 million in tax revenue at the local, county, state and federal levels. Ecotourism is becoming big business.

#### **Would tourists enjoy viewing empty home sites? (L16)**

*RESPONSE:* Purchasing homes within the Stewardship area would not be an efficient use of land acquisition dollars. The Service will generally seek to avoid acquiring established home sites. The emphasis will be on the protecting habitats and restoring wetlands. If older or mobile homes were purchased with tracts, they could be sold and removed to be used elsewhere in the community.

**There have been no economic studies on what your proposed action would have on the local business community. While you state hunting and recreation opportunities would increase and benefit the local economy, we would like to bring to your attention that hunting and wildlife viewing is seasonal in this area. Local business needs year round income to stay in business. Money spent by local farmers and ranchers far outweighs that spent by tourist. NEPA and the SBREFA both require an economic study on what effects federal agency actions have on the economy, local custom, and cultures. You have not complied with these Acts. (L17)**

*RESPONSE:* An economic analysis was provided in the Draft Comprehensive Conservation Plan/Environmental Assessment (see 4.3 Economic Effects on page 4-41). The economic analysis was contracted out to Jones and Stokes, Inc. Since there is nothing regulatory about our proposed actions there is no requirement to comply with SBREFA. We hope that the local farmer/rancher component of our community continues to stay intact and in business. Keeping the landscape in large landowner tracts such as those owned and managed by ranchers provides good wildlife habitat.

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**MISCELLANEOUS**

**Pages 1-5 of the CCP refer to the Inland Northwest Joint Venture, should be Intermountain West Joint Venture. (L9)**

*RESPONSE: We will make sure all references to IWJV are corrected.*

**Would like CCP to specifically mention the Centennial Riparian Restoration Project with goals for funding of equipment and seasonal personnel for watering, etc. (L11, L14)**

*RESPONSE: Although it is not referred to as the Centennial Legacy Riparian Project, that area is mentioned in the Habitat Management Plan summary (Appendix B) on page B-18 of the CCP under strategies for Objective 3C. The Pine Creek area is specifically mentioned in the HMP. We can add specific reference to the Centennial Legacy Riparian Restoration Project in Chapter 3 as an example of riparian restoration activity on the Refuge. The overall proposal in the CCP for additional staff positions at Turnbull would cover the needs of the Centennial project.*

**Service is asking for a budget increase from 1.7 to 27.7 million; tax dollars can be better utilized in other ways (L16)**

*RESPONSE: The 27.7 million is an estimate of the total one-time expenditure cost for Alternative 4 in the Draft CCP/EA (the maximum alternative – not the preferred alternative) summed over a 15 year period. Table F-5 in Appendix F of the Draft CCP/EA provides a budget summary which indicates that the estimated annual budget for Alternative 3 (the preferred alternative) would be close to \$3.5 million. This figure was based on full implementation of the alternative including proposed acquisition. Actual annual budgets will in all likelihood be much lower than this. Table F-2 (Appendix F) which shows Operational Costs under the four alternatives shows an operational budget of \$979,000 for Alternative 1 (No Action) and an operational budget of \$1,561,000 for the Preferred Alternative (Alternative 3). These operating budgets include refuge operations and fire operations. The increase in operating costs reflects the new positions proposed under Alternative 3 which include a second wildlife biologist, a second maintenance worker, a second temporary biological technician, a refuge operations specialist, a purchasing agent, a law enforcement officer, an environmental education specialist and an information and education specialist, a second seasonal firefighter, and an additional forestry technician. These proposed positions indicate a best case scenario and reflect what the Refuge would need to support all of the proposals in Alternative 3. Some of these positions would not be added unless there was a significant increase in acreage added to the current Refuge. The chances of filling all these new positions are slim even in good budget times. All these new positions will support programs and acquisitions proposed under Alternative 3. All other costs listed in Tables F-1 (One Time Costs), F-3 (maintenance backlog) reflects additional project and maintenance needs, not operating costs. Table F-5 is a total estimate of all costs, not just the annual operating budget.*

**Petition (436 signatures)**

The comment below was at the top of a petition sent to the Refuge near the close of the comment period and signed by 436 persons. Most of the petition signers provided an address though many of these were PO boxes. Judging from the addresses provided, the majority of the petition signers reside in Spokane County but do not live or own land within the Stewardship Area boundary.

**The Turnbull National Wildlife Refuge currently has a boundary of 20,827 acres and if the Turnbull Wildlife Refuge is managed properly, 20,827 acres are sufficient to support the wildlife. We feel Turnbull Wildlife Refuge should be managed under Option 1. We oppose any Stewardship Area and any increase in the present size of the Turnbull Wildlife Refuge. We suggest annual independent reviews of the management of Turnbull Wildlife Refuge to ensure the wildlife and the refuge resources are maintained at a sustainable level. The Federal Fish and Wildlife presently has the option to allow public hunting as a management tool if the wildlife should become too numerous. We feel this management option should be used to control wildlife numbers. Presently, only 2,200 acres are open to public use, we feel the number of acres open to public use should be increased.**

*RESPONSE: The Refuge is being managed by skilled and knowledgeable wildlife managers. A state of the art habitat management program has been developed for the Refuge and has been in implementation since being approved in 1999. Staff is making progress annually in forest, wetland, riparian restoration and management practices.*

*The Service agrees that the existing refuge, given the current landscape of private land use, is large enough to host a viable representation of most of the native species that currently exist here. Refuges, however, cannot be managed in isolation; they are but a part of a larger ecosystem. Their value as wildlife habitat will only be maintained if refuges exist in a landscape of private and public land-use that provides connectivity for the free interchange of native wildlife and plants. If the contrast between the Refuge and the surrounding landscape becomes too great, than the effectiveness of refuge habitats for wildlife will decline overtime irrespective of the management of refuge habitats. Wildlife, especially those with large home ranges or migratory species cannot meet all their habitat requirements on the Refuge alone and move to and from the Refuge and other habitats. Resident plant and animal populations are contiguous with those on adjacent lands allowing the exchange of genetic material within in a larger population base which increases the probability of their long-term survival.*

*For most of the Refuge's existence, surrounding land use has mostly complemented the Refuge by maintaining open space and providing a larger habitat base for wildlife and critical linkages to other undisturbed habitats. The situation around the Refuge is, however, changing. During the past twenty years, Spokane County has grown at a rate of 15% per decade (OFM, 1999). Increased home construction, business developments, and transportation infrastructure to service this growing population has further isolated the Refuge increasing the potential for external factors such as contamination of air and water, altered or depleted supplies of surface and ground water, loss of connectivity to other suitable or complimentary habitats, disturbance*

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*to wildlife, and the invasion of exotic plant and animal species to erode the integrity of the Refuge.*

*The land protection aspects of the CCP are designed more to support maintenance of existing land-use in the Refuge vicinity with some improvements for wildlife than to enact an extensive effort to expand Service land ownership. Acquisition is proposed only in situations where a willing seller exists and the land for sale contains high wildlife values that may be at risk from further development. Land acquisition by the Service is a partnership between the American public and an individual landowner to protect wildlife on their property. It is a partnership because the landowner must be a willing seller and buyers generally initiate the transaction because they want to see their land protected and managed for wildlife. The presence of a willing seller and high wildlife values are two conditions that must be present before any offer by the Service is made.*

*The Service already employs an extensive review process of its management activities. Refuges are visited annually by Refuge Supervisors from the Regional Office in Portland Oregon. On these visits they are shown all current management programs. Periodically programmatic reviews are done by Regional staff. Sometimes it is a habitat management programmatic review (as described below), sometimes a public use review, fire management review, or biological program review. These programmatic reviews are done by a panel of specialists, other refuge managers and Refuge supervisors.*

*For example for a habitat management review, this process begins with a multi-disciplinary review of each refuge's management program conducted by a team assembled by our Regional Refuge Biologist. This team is made up of subject matter experts and local individuals with specific knowledge of the areas wildlife and habitats. Members of these teams have included individuals from state and other federal agencies, university professors, members of local and national non-governmental groups, and local landowners. The outcome of this first review is a report on the present conditions of the Refuge, perceived problem areas, and recommendations for future management action including strategies for filling information gaps. The next step in this process is the development of a refuge Habitat Management Plan. This plan is developed with extensive public participation and is reviewed not only within the Service but by outside subject area experts as well. A significant part of this plan is a monitoring strategy that allows assessment of the applied actions. Annually the Refuge reports on its proposed management activities for the upcoming year and completes an accomplishments report at the end of the year that summarizes the actions taken and their effectiveness.*

*Hunting is our preferred method for controlling the expanding elk herd as it is the most economical strategy.*

*Under the CCP, there will be an increase in the general Public Use Area of approximately 390 additional acres. In addition to this increase, adding a hunting program will increase public access to 5000+ additional acres of the Refuge on a seasonal basis.*

## PLANNING

We received a few comments and questions on how the planning process was conducted, including the ease of finding documents, how public feedback had been summarized and used in alternatives development, and suggestions on meeting format. In addition, we received a comment on our wilderness review.

### **Suggest posting CCP on Turnbull NWR Web page (EM9)**

*RESPONSE: We will regularly update the Refuge web page and provide a link to the CCP. The planning update that was sent to approximately 1200 people on the mailing list in June 2005 included the correct web address for on-line viewing of the Turnbull CCP.*

### **Where are the earlier rounds of feedback from public involvement summarized? (EM11)**

*RESPONSE: In the Draft CCP/EA, public involvement efforts were summarized in Appendix K. This information has been updated in the Appendix K attached to this final CCP. The Service's public involvement effort on behalf of the CCP involved dozens of meetings with agencies, refuge neighbors, tribes, community organizations, elected officials, and the general public, as well as information gained from an alternatives workshop, questionnaires included with planning updates, and public surveys. Because we received information from such a variety of sources in numerous formats over several years, there was no simple summary or comparison of feedback that could be easily and succinctly provided in the CCP. Some information on the preliminary scoping that was done at the start of the planning process was summarized in Planning Update #2, which was sent to about 1000 people on the mailing list in November 2000. Notes and summaries from the meetings, workshops, and questionnaires have been kept as part of our planning record.*

### **In the definition and shaping of alternatives, why has there been no systematic poll of potentially affected property owners as opposed to a few token public meetings? (EM11)**

*RESPONSE: The staff at Turnbull Refuge conducted eight meetings in 2002 and 2003 specifically to solicit feedback from Refuge neighbors and potentially affected property owners. All major property owners with land inside the proposed Stewardship Area were invited. Many property owners were also personally invited to the alternatives workshop held in June 2002 (this workshop was advertised and open to the general public as well). We did not regard these meetings and workshops as token efforts. Feedback we received at the workshop played a pivotal role in the development of the Stewardship Area concept. We have heard a great variety of opinion expressed through the varied and numerous public involvement efforts undertaken (see previous question) and we remain interested in keeping channels of communication open so that we can continue to understand the points of view of various members of the public and learn from each other. Polls are useful but limited devices that capture opinion at a point in time but do not perpetuate greater understanding and communication.*

### **An open meeting would be more beneficial. (PM 11) Don't waste people's time with these informal meetings. Last meeting much better. (PM8)**

*RESPONSE: A number of meetings have been conducted in a variety of meeting formats; centralized presentations with questions and answer periods, and smaller groups that afford an opportunity for one on one contact with staff members.*

**It would appear that without removal of all county roads, airports, railroad tracks and commercial enterprise, that Refuge goals [for wilderness character] would not be met. (F18)**

*RESPONSE: Wilderness goals are not part of the Refuge goals for Turnbull or the Stewardship Area (see Chapter 1 of the document). U.S. Fish and Wildlife Service policy (Section 602, also section 610 of Refuge Manual) requires wilderness reviews to be completed as part of the CCP process, including areas that are part of a Study Area for potential inclusion within the National Wildlife Refuge System. The purpose of the review is to determine whether any area on the Refuge or within the Study Area is suitable for recommendation to Congress for wilderness designation. It was concluded (see Appendix H) that there are no areas on Turnbull National Wildlife Refuge or within the Study Area that could be recommended as suitable for further consideration of wilderness designation.*

**Informed at the open house that priorities have not been finalized and I would like to see the final draft. (PM14).**

*RESPONSE: The public will have access to the final CCP.*

**It seems that positive measures were deliberately omitted from Alternative 1 in order to make it less attractive – they should be restored (No Action is Alternative #0). (F5)**

*RESPONSE: Under the National Environmental Policy Act (NEPA), we are required to analyze a “no-action” alternative. The “no action” alternative (current management) is presented to allow the public to compare the results of implementing the other alternatives. The “no-action” alternative in the Draft CCP/EA is Alternative 1. All current management strategies utilized on the Refuge remain the same under this Alternative. There was no Alternative 0 in the document.*

## Index to Written Comments Received on Turnbull Draft CCP/EA

Sixteen letters received through the mail were identified with the initial L before the number.  
 Emails received were identified with the initials EM before the number (a total of 24 were received).  
 Forms received at the public meeting start with PM (a total of 14 were received).  
 Forms received through the mail start with F (a total of 40 were received).

Identifier	Signatory	Organization Representing
L1	Lloran Johnson	Inland Northwest Wildlife Council
L2	Alfred Nomee	Coeur D'Alene Tribe
L3	Chris DeForest	Inland Northwest Land Trust
L4	Luella Dow	
L5	Brick Cortner	
L6	Gayle Cortner	
L7	T.M. Snodgrass	
L8	Bert and Karen Smith	
L9	Ivan Lines	Ducks Unlimited
L10	Edward and Janet Reynolds	
L11	Joyce Alonso	Spokane Audubon Society
L12	W. Gale Mueller	
L13	Jan Strobeck	
L14	Patty Honff *	
L15	Kristin and Terry Mansfield	
L16	Steve Barrett	Friends of Private Property
EM1	<a href="mailto:jwp6909@aol.com">jwp6909@aol.com</a>	
EM2	B. Sachau	
EM3	Eugene Kiver	
EM4	Richard Mathisen	
EM5	Donna Phillips	
EM6	Sandra Huggins	
EM7	Mike Roth	Gonzaga University
EM8	T.F. McLaughlin	
EM9	Michael Estes	
EM10	Shaune Gramlow	
EM11	Barry and Gail Hicks	
EM12	Don Kraege	Washington Dept. of Fish and Wildlife
EM13	Len Barson	The Nature Conservancy of Washington
EM14	Peggy O'Connell	
EM15	Rick Steenhoven	
EM16	Jim Hallett	
EM17	Brian Roth	
EM18	Brian Miller	
EM19	<a href="mailto:donlarsen@comcast.net">donlarsen@comcast.net</a>	
EM20	Hans Krauss	
EM21	Mark Burandt	
EM22	Gina Sheridan	
EM23	Bruce Lang	
EM24	Walter and Norma Trefry	
PM1	Victoria Lamp	
PM2	Daryl Dirm *	
PM3	Steve Barrett	



PM4 John Ginsburg  
PM5 Larry Danielson  
PM6 Rick Brash  
PM7 Bret Brash  
PM8 Shawn Brash  
PM9 Herb and Nancy Sagerser  
PM10 Jennifer Dahl  
PM11 Les Harris and Sibylle Harris  
PM12 Gary Dahl  
PM13 Curt and Betty Humphrey \*  
PM14 Harvey Zacher

F1 Keith Cress  
F2 Dolores and Rober Griffith  
F3 Donald White  
F4 Joan Tracy  
F5 Maurice and Laura Vial  
F6 Ken Green  
F7 Anthony Appel  
F8 Kenneth Gudge  
F9 Michael Miller  
F10 Jack Nisbet  
F11 No name  
F12 David Pirello  
F13 Paul Decker  
F14 Jill Herman  
F15 Linda Bolte and George Barnett  
F16 Bill Safronek \*  
F17 Margo Wolf  
F18 David Babb  
F19 Gary Saylor  
F20 Paul Quinell  
F21 Eleen Benson  
F22 Craig Olson  
F23 N.A. Cordill  
F24 Florida Goodson  
F25 Marian Frobe  
F26 Nancy McRae  
F27 Derek Hanson  
F28 Jim Kujala  
F29 Cela Kruse  
F30 Brian and Caryn Bothman  
F31 Clint Watkins  
F32 Bob and Jeanne Grogan  
F33 Margaret Coombs  
F34 Jack Coombs  
F35 Marion Henry  
F36 Thomas Fischer  
F37 Phyllis Siberman  
F38 Doug Fulton Spangle Gun Club  
F39 Laura Fallis  
F40 Marianna Boyd

\* Spelling maybe be incorrect.