



WILDERNESS WATCH

Keeping Wilderness Wild

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June 8, 2020

U.S. Fish and Wildlife Service
5275 Leesburg Pike
MS: PRB/PERMA (JAO)
Falls Church, VA 22041-3803

RE: Comments on expanded hunting in the wildlife refuges via the electronic portal and email

These are comments submitted by Wilderness Watch on the expansion of hunting in various national wildlife refuges. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. Our comments focus on the Wildernesses affected by this proposal.

Introduction

By way of introduction, the information about the changes is difficult to access on a site-specific level. It appears there are concurrent comment periods for some, but not all, of the individual wildlife refuges where changes have been proposed. The federal register announcement refers to Supplementary Information. Thus, it is hard to know exactly where to send comments. We are sending copies to individual refuges via electronic means, where available.

Our concerns revolve around the impacts of the change on Wilderness. Wildlife is an important component of Wilderness, especially in national wildlife refuge system. Thus, expansion of hunting, be it in terms of increased human use, impacts to functioning natural systems, or something else, could negatively affect Wilderness.

The site-specific comments below are for each national wildlife refuge, which have Wilderness in the federal register announcement:

Cabeza Prieta

As the draft EA notes, 803,418 acres of the 860,000-acre refuge is designated as Wilderness. Any changes in hunting policy will affect Wilderness.

A major problem, and it is apparently ongoing, is the reference to routes used by bighorn sheep hunters in the EA, the Draft compatibility determination (CD), and the draft hunt plan (HP). The CD states, "Because bighorn sheep hunters may use access routes not open to the public, all bighorn sheep hunters must also obtain a SUP." The EA further explains, "A network of administrative trails also exists in the wilderness. These are old jeep or truck trails that were established prior to wilderness designation. The administrative trails are used for vehicular access to the refuge by staff for management purposes, subject to minimum requirements analysis, but are closed to any mechanical or motorized travel by the general public (USFWS 2007)." Taken together, this suggests that bighorn sheep hunters, with a special use permit (SUP), can use motorized or mechanized access into the Wilderness.

Further, comments on the CCP suggested they should be open to vehicle access. Have bighorn sheep hunters been allowed to or will they be allowed to use motorized or mechanized vehicles on these access routes? If so, that is or would be a clear violation of the Wilderness Act and must be ended. Please clarify this information. The wording of the EA and associated documents and unfortunate history of motorized use in the Cabeza Prieta Wilderness (legal and illegal), make it imperative that current, ongoing, and future impacts of motorized uses are accurately described and analyzed. The cumulative impacts analysis must include accurate information regarding the motorized vehicle use by Customs and Border Patrol agents and the U.S. Fish and Wildlife staff, and how layering on additional motorized uses by hunters will further harm Wilderness and wildlife.

The incredible expansion of hunting in the refuge could have serious impacts on Wilderness. The only analysis in the Wilderness sections of the EA states:

Under this alternative, refuge visitation would increase by a maximum of 90 percent in terms of the number of visitor use days, from about 1,698 to 3,236 visitor use days annually. Given the vast size of the refuge, however, no measureable increase in impacts to the refuge's wilderness character associated with increased hunting activity would be expected.

Regardless, a 90 percent increase in use, especially in certain areas, could have serious site-specific impacts on Wilderness in terms of sheer use and human impact. That is almost a doubling of use. This use is expected to be day use, so it would presumably occur near the routes that are excluded from the Wilderness. In fact, the EA later states regarding impacts to soils:

Impacts would be similar to those described above, however, the Proposed Action Alternative could cause greater disturbance of desert pavement or cryptogamic soil crust due to the maximum 90 percent increase in number of visitor use days anticipated, from about 1,698 to 3,236 visitor use days. This impact would be limited to the areas along the public access roads and entry points in Childs Valley. Soil disturbance/compaction from increased hunting opportunities would affect a maximum of 167,000 acres (19 percent) of the 860,000-acre refuge.

This increase in soil damage would largely occur in Wilderness. Of the 167,000 acres of added

impact, only 56,000 or 57,000 would occur in non-wilderness lands, the approximate extent of all the non-wilderness land in the refuge. 110,000 acres of Wilderness would see increased soil compaction and disturbance. The EA is silent on what that means for Wilderness, though this could be interpreted as a tacit admission that increased impacts from a near doubling of use in some parts of the Wilderness would significantly degrade the Wilderness.

Further, the analysis in the Wilderness section ignores the impacts to Wilderness from the hunting of predators where it was previously forbidden, the fact that some species may be hunted year-round, and the increase of hunted species from one to sixteen. At the very least, this should have been considered.

Furthermore, the EA notes that the FWS has almost no information on predators or their numbers. The EA states:

Coyote, spotted skunk, bobcat, ringtail, badger, and kit and gray fox occur on Cabeza Prieta NWR. Because none of these species is formally surveyed on the refuge, exact population estimates do not exist and demographic trends are unknown. Between 2013 and 2016, one ringtail cat was photographed on the refuge by a motion-activated camera in the Fawn Hills, Mohawk Valley (S. Doerries, unpublished data).

This is hardly justification to hunt those species. Sound wildlife hunting policy dictates that information be available.

In light of the ongoing drought in the southwest and the exacerbating impacts of climate change, the analysis of the impacts of increased hunting must include a cumulative effects analysis for this proposed decision. The analysis must also include information related to the construction of the border wall across the southern portion of the refuge that will significantly alter wildlife movement and migration. How will added hunting pressures on wildlife affect wildlife populations in light of the complete destruction of migration corridors?

In sum, the proposal for the Cabeza Prieta is not sufficiently explained. It may be that the impacts of increased hunting won't degrade the Wilderness, but that case is not made. Rather, the analysis that exists, and it is rather sparse, suggests the impacts are more significant than recognized. Increasing impacts to 110,000 acres of Wilderness is hardly insignificant. Without a more complete analysis, this does not comply with either the Wilderness Act or NEPA. It is clear that the decision for Cabeza Prieta requires the preparation of an Environmental Impact Statement.

Crab Orchard

The EA and associated materials don't indicate if any of the changes would affect the Crab Orchard Wilderness, which consists of a portion of the wildlife refuge. Although there would be an increase in ten species that would be hunted, the information is not explicit as to whether increased use or other impacts are expected in the Wilderness.

Bosque Del Apache

The only information we could find about the Bosque Del Apache Wilderness, which consists of a portion of the wildlife refuge, is the CD. The EA was not easily accessible on the FWS website. The report suggests there might be a safety issue for Wilderness, but goes no further. There is an increase in the number of species hunted.

Fort Niobrara

The only information we could find about the Fort Niobrara Wilderness, which consists of a portion of the wildlife refuge, is the HP. The EA was not easily accessible on the FWS website. The report suggests there might be a safety issue for Wilderness, but goes no further. There is an increase in the number of species hunted.

The HP states, "Some people might be concerned with opening so much new use in the refuge Wilderness Area." Currently, deer and elk are hunted on the refuge. The proposal would add nearly thirty more species to the list. According to the HP, most of the refuge portion that is and would be open for hunting includes Wilderness.

Summary

While hunting is allowed in many wildlife refuges, the desire to increase use via hunting in the designated Wildernesses in the refuges noted above has not been supported by solid information. It also appears that in at least one case, the FWS may allow (and perhaps does currently allow) uses illegal in Wilderness associated with hunting bighorn sheep. The sheer increase in numbers that might occur, and concomitant effects to the Wildernesses, are largely unaddressed. Rather than a thoughtful proposal, this appears to be politically motivated grandstanding without much forethought.

Sincerely,



Gary Macfarlane
Board Member