



June 29, 2021

Sent via email: HuntFishRuleComments@fws.gov

RE: Proposed changes to Hunting and Fishing Plans for Bill Williams and Havasu National Wildlife Refuges

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on proposed changes to the Hunting and Fishing Programs on the Bill Williams and (BWNWR) Havasu (HNWR) National Wildlife Refuges.

AZSFWC is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. We have 40 member, affiliate and associate groups that reach across the spectrum of wildlife conservation, hunting, angling, shooting, outdoor recreation groups, and businesses from across Arizona. Our member groups represent over 16,000 people from Arizona.

Both refuges provide abundant consumptive and non-consumptive wildlife recreation opportunities that are enjoyed by our membership and the many other visitors to BWNWR and HNWR. We appreciate the Fish and Wildlife Service (Service) efforts to expand hunting and fishing opportunities pursuant to Department of Interior Secretarial Orders 3356 and 3366. We likewise appreciate coordination between Service staff and the Arizona Game and Fish Department (AZGFD) in this planning process. After reviewing the draft plans and their respective environmental assessments (EAs) and compatibility determinations, we offer the following comments.

Our greatest concern is that the Service has already opened a rulemaking docket (FWS-HQ-NWRS-2021-0027) that incorporates proposed changes in these draft plans, which are presumably subject to modification in response to public comment. At best, this process disconnect is inefficient and confusing to the public, who are being asked to weigh in on the umbrella rule before refuge-specific planning is complete. It also creates the appearance of a pre-determined decision that shortcuts the public process.

In responding to comments on these refuge specific EAs and hunting plans, the Service must provide a clear timeline and explanation of how it intends to incorporate public input and then integrate the final documents into subsequent station-specific rulemaking. Looking ahead, it is incumbent on the Service to finalize other refuge-specific plans and NEPA documents before including them in the station-specific rule.

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There are several discrepancies between the EA analyses and proposed plans for the two refuges. This suggests a somewhat haphazard approach without sufficient direction and sideboards. We encourage the Service to work with their respective state agency partners to develop a clearly articulated analytic framework that will be implemented as hunting and fishing plan revision occurs on other refuge units.

Refuge Specific Comments

Deer hunting (BWNWR) - AZSFWC feels the EA assessment of hunting impacts to deer is without biological justification and insufficient to justify dismissal of Alternative C. Specifically, the EA (p. 24) states:

"The refuge speculates that hunting pressure on a small local population could cause a decline in numbers. A monitoring program may be implemented and the timing and duration of the refuge's mule deer hunting season may be adjusted to avoid adverse effects on mule deer populations."

Mule deer in the Sonoran Desert have large home ranges, that can change dramatically with precipitation and resource availability. It is extremely unlikely that the Refuge supports a distinct local population that should be managed separately, but rather a number of individuals whose home ranges also encompass surrounding non-refuge lands. Moreover, legal deer hunting would be limited to bucks-only, with only a handful of animals likely to be taken during the season. The population-level impacts of such harvest would be inconsequential. Finally, we note that AZGFD already has a long-term deer survey program that provides information needed to manage deer populations at the hunt unit level.

AZSFWC supports the mule deer hunting option included in Alternative C and requests that it be blended into the final selected alternative.

Deer hunting (HNWR) - AZSFWC appreciates the refuge's analysis of potential impacts of deer hunting, which suggests few, if any negative impacts to the resource and refuge operations, with the benefit of increased, albeit limited opportunity to the hunting public.

AZSFWC supports the mule deer hunting option included in Alternative C and requests that it be blended into the final selected alternative.

Feral hogs (BWNWR) - the EA (p. 6) considered but dismissed hunting of feral hogs from further consideration, stating that:

"Feral hogs are not present on the refuge and pigeons are relatively rare. Therefore, the refuge is not considering opening these species at this time."

AZSFWC finds this proposal short-sighted. Feral hogs are expanding across Arizona, bringing the potential for significant adverse impacts to ecosystems and native wildlife. Once established, feral hogs are difficult and expensive to control. Allowing take of feral hogs could prevent or lessen future resource damage that the refuge may have to

address. AZSFWC requests that take of feral hogs be blended into the final selected alternative.

Feral hogs (HNWR) - for the reasons noted above, we appreciate and support the inclusion of feral hogs in the proposed hunting plan. However, we request that the term "*incidental*" be removed. Hunting by the public is a sensible way to keep the population of these animals in check and possibly eliminate or reduce the need for expensive control efforts in the future. Constraining opportunity will not be helpful in that regard.

Alignment with regulations on adjacent lands - we appreciate the effort to align seasons, methods of take, and other regulations with those on adjacent non-refuge lands. This consistency and clarity are important to the hunting public and from an enforcement standpoint as well. It is especially needed for refuges in such close geographic proximity. We encourage the refuges to continue coordination with AZGFD to increase alignment and support timely adaptive management. A potential vehicle for that could be an annual Service-AZGFD meeting during the AZGFD's hunt recommendation process.

Falconry - the HNWR EA did not analyze falconry as a method of take. The BWNWR EA (p. 6) considered but dismissed falconry from further consideration stating:

"These methods of take may cause disturbance to neotropical migratory birds, as well as resident endangered Yuma Ridgway's rail, which use the refuge for breeding or as a stopover site during the winter months when the refuge is open to hunting."

We find the failure to analyze falconry and dismissal of the falconry-inclusive alternative on the two refuges arbitrary and lacking biological justification, respectively. We note that most neotropical migratory birds are on their wintering grounds (and off the refuge) during the Fall-Winter-early Spring periods when licensed falconers would legally pursue game. There are only a small number of licensed falconers in Arizona, so falconry use on the refuges would be extremely limited. The resulting "disturbance" would be inconsequential compared to that occurring daily by wintering and resident wild raptors. In the response to comments, we request the Service to provide a more thorough justification for the statement above, including relevant citations from the scientific literature. We also request that falconry be given a more thorough analysis in the next revision to refuge hunting plans.

Methods of take - methods of take should be aligned as closely as possible between the two refuges. For example, on HNWR, hunts allowing archery gear also permit the use of crossbows, but this appears not to be the case on BWNWR. Crossbows should be allowed on both refuges, as a reasonable accommodation for physically disadvantaged hunters holding AZGFD-issued crossbow permits.

Muzzle loading rifles and handguns should be added for all hunts where shotguns shooting slugs are allowed. High-quality, lead-free muzzleloader bullets are readily available. The identical (or remarkably similar) projectiles are also used in sabot-type shotgun slugs; both are equivalent in their ballistics and safety envelopes.

Use of dogs for pursuit and retrieval of game - both refuges allow hunting of quail and cottontail rabbits, for which sporting dogs are commonly used. Dogs are an integral part

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of the hunting experience for many hunters and minimize the loss of wounded or downed animals. These dogs are typically kept under tight control with verbal commands and e-collars, which can prevent unintended encounters with other wildlife.

AZSFWC requests that hunting plans for both refuges be amended to allow the use of dogs for pursuit and retrieval of game during open seasons.

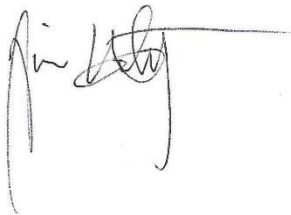
Game cameras - the Arizona Game and Fish Commission recently voted to ban the use of game cameras for the take of wildlife, effective January 1, 2022. Language in refuge regulations will need to be adjusted accordingly.

Next steps - AZSFWC appreciates the positive steps taken in response to the Secretarial Orders. The outcomes clearly demonstrate that there were (and remain) additional, sustainable opportunities for the hunting and fishing public on these refuges. We look forward to seeing them made available. However, at this point, there is no articulated path to finalize these plans and incorporate them into a station-specific rule. The Service needs to provide the public much-needed clarity on this issue.

From a broader perspective, Arizona is a rapidly growing state, while the last year brought unprecedented recreation pressure on our public lands. We also live in a changing climate with historic drought affecting ecosystems and wildlife populations statewide. Management under such uncertainty begs effective coordination among resource agencies and the ability to respond in a timely fashion. We feel that this type of review and update should be a regular and formalized process, much as other federal land managers do with their land and resource management plans.

AZSFWC and 25 of our member organizations (list follows) support these comments and recommendations.

Thank you.

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director



**AZSFWC Member Organizations Supporting
USFWS Station Specific Hunting Regulation Proposals
for Bill Williams and Havasu NWRS**

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen's Association
AZ Outdoor Sports
AZ Predator Callers
Christian Hunters of America
Kahuna's Kids
Outdoor Experience 4 All
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Theodore Roosevelt Conservation Partnership
Valley of the Sun Quail Forever
Yuma Valley Rod & Gun Club
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