



June 29, 2021

*Sent via CARA*

**RE: 2021-2022 Station-Specific Hunting and Fishing Proposed Rule  
National Wildlife Refuges and National Fish Hatcheries**

**Docket#: FWS-HQ-NWRS-2021-0027**

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on the 2021-2022 Station-Specific Hunting and Fishing Proposed Rule for National Wildlife Refuges and National Fish Hatcheries Narratives.

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.

National Wildlife Refuges in Arizona provide abundant consumptive and non-consumptive wildlife recreation opportunities that are enjoyed by our membership and many other visitors to these areas. We appreciate the Fish and Wildlife Service (Service) efforts to expand hunting and fishing opportunities on these units, 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 docket, we have two serious concerns.

First, two Arizona refuge units (Bill Williams and Lake Havasu) are in the process of revising their hunting and fishing regulations and have published draft Environmental Assessments (EA), hunting plans, and compatibility determinations. The public comment period for those documents is open as of the date of this letter. Our organization has submitted written comments separately (appended here for your convenience). We support many of the proposed changes but feel that additional modifications are needed to better align refuge regulations with those on surrounding lands and provide additional hunting opportunities that were not considered.

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 the proposed station-specific rule, the Service must provide a

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clear timeline and explanation of how it intends to incorporate the final refuge-specific EAs and documents into subsequent 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.

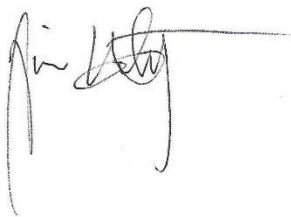
Our second concern relates to the criteria for identifying and proposing changes to the refuge-specific hunting plans and how that information was presented to the public. Neither of the EAs presented a clear, detailed narrative of the decision framework underlying their analysis. For some species, e.g., mule deer, which occur in a common ecological and recreational use setting on both refuges, impact analyses in the EAs draw dramatically different conclusions. We also note that the draft recommendations (as presented in the hunting plans) are not readily compared and do not align in several respects.

The latter is a matter of concern, given the geographic proximity and similarities between the two refuges. As currently proposed, hunters will be faced with different regulations on these units, that are also inconsistent with those on surrounding non-refuge lands. Overall, these outcomes suggest a somewhat haphazard process without sufficient guidance and sideboards. We strongly encourage the Service to work with the respective state wildlife agencies to develop a clearly articulated analytic framework, that will be implemented as hunting and fishing plan revision occurs on other refuge units.

AZSFWC appreciates the positive steps taken in response to the Secretarial Orders. The EAs and proposed plan revisions clearly demonstrate that there were (and remain) additional, sustainable opportunities for the hunting and fishing public on these refuges. We look forward to seeing these come to fruition.

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.

Thank you for the opportunity to comment on these proposals.

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

Jim Unmacht  
Executive Director