



June 8, 2020

Submitted via: [www.regulations.gov](http://www.regulations.gov)

U.S. Fish and Wildlife Service  
Attn: FWS-HQ-NWRS-2020-0013  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

**Re: 2020–2021 Station-Specific Hunting and Sport Fishing Regulations (Docket Number: FWS-HQ-NWRS2020-0013)**

On behalf of Arizona Sportsmen for Wildlife Conservation (AZSFWC), we appreciate the opportunity to comment on the U.S. Fish and Wildlife Service’s (Service) proposed “2020-2021 Station-Specific Hunting and Sport Fishing Regulations,” (Mar. 9, 2020).

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, hunter recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC has 38 member, affiliate, and associate organizations representing in excess of 10,000 sportsmen and women who span the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses across Arizona.

Our National Wildlife Refuge System (NWRS) provides a wealth of wildlife-oriented recreational opportunities for our members, along with thousands of visitors from all over Arizona and surrounding states. The NWRS is an important economic component to communities in Arizona and across the country too. The expansion of hunting, angling and recreation across the NWRS will go a long way in enhancing the quality of the varying visitor experiences for years to come.

Access to our Federal public lands has become increasing problematic as more people recreate, coupled with more restrictions placed on our public lands. It has also been cited as one of the main reasons hunters and anglers stop enjoying their passions. Efforts like this one to expand recreational access across the NWRS will help stem that tide!

AZSFWC appreciates the collaboration between the Service and state wildlife agencies in proposing changes to this rule. Specifically to Arizona, the cooperation with our Arizona Game & Fish Department (AZGFD) is vital to not only the Service, but hunters, anglers, and all members of the recreating public. Secretarial Orders 3356 and 3366 expands hunting and fishing opportunities and increases recreational opportunities respectively, on federally managed lands while improving wildlife management through collaboration with the State. These orders direct bureaus to “work cooperatively with State, tribal, and territorial wildlife agencies to ensure that hunting and fishing regulations for Department of

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Interior (DOI) lands and waters complement the regulations on the surrounding lands and waters to the extent legally practicable.”

**AZSFWC recommends the Service do the following:**

1. **Grant AZGFD with Cooperating Agency status** as the regulatory agency for hunting and angling in Arizona with jurisdictional authority and special expertise, for this docket and all subsequent Station-Specific Hunting and Sport Fishing Regulations. This would include ongoing dialog and consultation, of particular importance if more restrictive regulations might be necessary on a specific refuge.
2. **Full alignment with State hunting regulations** on NWRs within Arizona, consistent with Commission Orders and Game Management Units (GMU) where the NWRs are located. Full alignment would facilitate stewardship of Arizona’s NWRs by reducing confusion with different regulations, help remove obstacles to hunter and angler participation, and enhance recruitment of Arizona’s wildlife-related recreationists. The conservation and protection of Arizona’s wildlife and habitat would benefit directly.
3. **Full alignment with State lawful methods of take** consistent with respective GMU’s to help simplify the regulations. Some examples include:
  - a. Use of dogs for pointing, retrieving and pursuit
  - b. Falconry
  - c. Migratory Bird Stamp not required for Eurasian collared doves
  - d. Year long season on rabbits and jackrabbits
4. **Communication and messaging should be consistent** and coordinated for the public’s benefit. This is important when changes to regulations governing hunting and sport fishing on Service managed lands [50 Code of Federal Regulations (CFR)] are proposed. Some examples include:
  - a. Discrepancies between the proposed 50 CFR and draft hunt plans for Arizona NWR’s should be aligned.
  - b. Provide adequate supporting documentation for NWRs’ hunt plans; ie, Buenos Aries and Leslie Canyon.
  - c. Utilize concurrent review periods for NWRS hunt plans.
  - d. Provide user friendly information via websites, literature and signage for all wildlife recreation users, including hunters and non-hunters alike.

**AZSFWC also has station specific comments relative to the four Arizona NWR’s slated for expanded opportunities. They are as follows:**

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## **Buenos Aires**

AZSFWC supports the addition of new hunting opportunities:

1. Migratory Game Bird Hunting that includes the following species: merganser, moorhen (gallinule), and common snipe.
2. Upland Game Hunting that includes these species: badger, bobcat, coati, kit and gray fox, raccoon, and ringtail.
3. Big Game Hunting that includes mountain lion.
4. AZSFWC agrees there should be no quail hunting on this refuge due to the ongoing efforts at recovering the endangered Masked bobwhite quail.
5. AZSFWC concurs with AZGFD that there is currently no lost opportunity for the hunting of pronghorn on the refuge, but also agrees with the AZGFD request they continue to be allowed to conduct pronghorn surveys (ground and aerial) as necessary to monitor the population.
6. The hunt plan was not included in the supporting documentation for this docket.

## **Cabeza Prieta**

AZSFWC supports the addition of new hunting opportunities:

1. Migratory Game Bird Hunting for mourning dove.
2. Upland Game Hunting for the following species: Gambel's quail, Eurasian collared-dove, desert cottontail rabbit, antelope and black-tailed jackrabbit, coyote, spotted skunk, bobcat, ringtail, badger, and fox hunting in designated areas.
3. Big Game Hunting for mule deer and mountain lion.
4. AZSFWC concurs with the AZGFD that white-tailed deer should be included in Big Game Hunting as well.

## **Cibola**

AZSFWC concurs with the AZGFD commentary related to this refuge.

1. Clarify what opportunities are being expanded on this refuge, including Big Game Hunting.

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2. Language should be consistent with other NWR's, ie; "archery" versus "bow and arrow".
3. Align the methods of take and expansion of deer hunting, along with regulatory alignment for Eurasian collared-doves, rabbits and jackrabbits.

### **Leslie Canyon**

AZSFWC supports the new hunting opportunities for this refuge and expansion as noted, however clarification and alignment are needed:

1. Migratory Game Bird Hunting (h)(1) that includes mourning dove, white-winged dove, and Eurasian collared-dove in designated areas.
2. Upland Game Hunting (h)(2) that includes Gambel's and scaled quail, cottontail, black-tailed jackrabbit, gray fox, coati, badger, striped, hooded, spotted, and hog-nosed skunk, bobcat, raccoon, ring-tailed cat, and coyote in designated areas.
3. Alignment of Upland Game Hunting with AZGFD State regulations. Under Upland Game Hunting (h)(2)(iii) states, "We allow upland game hunting on the refuge only during general or archery State deer and javelina hunts when seasons overlap." As proposed, the Upland Game Hunting season would start and stop multiple times in several disjunct 'seasons' as deer and javelina seasons have gaps of time between them.
4. Specific to quail, as proposed season dates will be extremely confusing to hunters and likely cause inadvertent violations with State law and the NWR hunt plan. The hunt plan's opening date occurs before the State opener and the closing date would be after the State closure. Full alignment with the State seasons would remedy this issue, and be consistent with other NWR's in Arizona.
5. Clarification is also needed on the use of dogs. The proposed 50 CFR does not prohibit dogs for the retrieval of fowl, however the EA and hunt plan does. The use of dogs for pointing, flushing and retrieving of quail should be permitted.
6. Big Game Hunting includes mule deer, white-tailed deer, javelina, and black bear hunting in designated areas.
7. Mountain lion should be included in Big Game Hunting. Mountain lion season is open in all surrounding GMUs and has been for decades. Moreover, mountain lion hunting is being proposed on other refuges including Buenos Aires and Cabeza.

The reasoning provided in the hunt plan EA was to minimize potential conflicts that may arise from misidentification between the mountain lion and the endangered jaguar. There have been no known incidences of mistaken identity by hunters.

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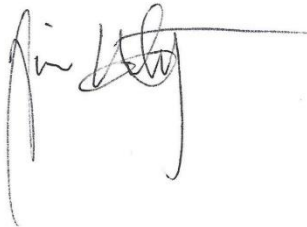
AZSFWC concurs with the AZGFD request for full alignment of mountain lion hunting as noted in the State regulations, including with the use of dogs.

8. Alignment with State regulations should occur for Eurasian collared doves, rabbits and jackrabbits.
9. The hunt plan was not included in the supporting documentation for this docket.

AZSFWC and 24 of our member organizations (see attached list) strongly support the Service's proposal to expand station-specific hunting and sport fishing opportunities within the NWRS.

We appreciate the efforts at expanding hunting opportunities in Arizona's four refuges as outlined above, and urge the Service to work collaboratively with the AZGFD to further align the proposals and hunt plans to track with the State regulations.

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 and Sport Fishing  
Regulations Proposals for 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  
Yuma Valley Rod & Gun Club  
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