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Steve Whitson
Refuge Manger
16194 Swan Lake Ave.
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Attention: Swan Lake National Wildlife Refuge CCP

Mr. Steve Whitson,

My name is Jody Graff, I was born in Brookfield, Missouri in 1980. My admiration of wildlife began when I was just old enough to remember. My father took me on my first goose hunt when I was four years old. On this memorable day I retrieved my first Canada goose. The trend continued: I shot my first goose at age six and first duck when I was eight. My childhood is filled with memories of hunting in the Whitton Bottoms just South of Swan Lake National Wildlife Refuge. I grew up fishing in the area; one of my favorite summer fishing trips was to Silver Lake. There are several traditions shared among my family and friends such as going with my dad and his buddies to set out bank lines and trot lines in Silver Lake in pursuit of flathead catfish. Needless to say, at the tender age of eight, I was not big enough to pull in flathead that weighed as much as I did. When I was in high school, football practice couldn't end soon enough so my buddies and I could catch the last hour of daylight driving through Swan Lake's Auto Tour Route. Each evening we glassed the bean fields with high hopes of catching a glimpse of a potential world class buck or two. During my life I learned an appreciation for wildlife as a hunter, fisherman, conservationist, and outdoor enthusiast much thanks to the opportunities Swan Lake NWR offers. These experiences played a vital role in my life and the person I am today. I look forward to the day that I can enjoy the same experiences and continue these traditions with my children at Swan Lake NWR.

After graduating college, I came back to this small-town life in North Central Missouri to pursue my passion for observation, conservation and sportsmanship on and around Swan Lake NWR. I was fortunate to find a job but, this job was second priority to getting back to the area and its' wildlife that I grew to love as a youngster!

Over the years I have learned to engage in more outdoor opportunities than just hunting in our wildlife area. I have been practicing management and conservation techniques relative to wildlife habitat improvements in attempt to enhance the quality of health and sustainability of the wildlife we enjoy so dearly. I have been involved with improvement projects on thousands of acres of privately owned ground in our area.

One week ago I received the Swan Lake NWR Draft Comprehensive Conservation Plan and Environmental Assessment (CCP). After studying the document I have been trying to understand the dramatic proposed alterations of wildlife habitat at Swan Lake. I have had some difficulty digesting the lengthy 190 page draft of the CCP. In addition to the lengthy document it seems to be loaded with technical information and data. In order to fully understand the draft CCP I will need to take much more time to conclude my perspective on the proposed alterations to Swan Lake NWR. Due to the "thoroughness" of the CCP I expect I am not alone and that others will need more time to fully develop a confident perception of the proposed changes to provided thoughtful insight, comments, and suggestions.

At first blush, many people in the community are overwhelmed with fear. I do not believe that a six hour public comment period is going to suffice answering all of the questions I have, not including the rest of the community. Can you help educate the people in our community about the positive impacts this could have for Swan Lake's wildlife?

At this time I do not support the draft CCP. I do not feel the potential implications of the "preferred alternative" are fully understood. Local communities around Swan Lake NWR will not survive without the presence of wildlife viewers, hunters, and fisherman. With the proposed direction of the CCP there will be a significant reduction in the number of visitor use days as a direct result of 2.3.4 Alternative 3: Preferred Alternative, reduction in Silver Lake basin. If there is not a guaranteed water source, the local economy will be at the mercy of the weather pattern. If successive dry years eliminate the habitat for migrating birds, the change in migration pattern could have a devastating impact on the local economy.

I am confident that there are changes that can be made to improve habitat diversity without eliminating the capability of Swan Lake's most valuable asset, Silver Lake. Silver Lake is the key to producing suitable habitat for migrating birds. Silver Lake allows intense and adaptive management in the moist soil units to be drawn down during spring and summer months. This encourages the appropriate moist soil vegetation growth to capitalize on the opportunity to flood the moist soil areas prior to and during the migrations. This asset is the centerpiece of Swan Lake NWR's ability to provide suitable habitat for migrating birds, without that essential asset, the area's ability will be compromised.

Though I believe that duck hunting at Swan Lake NWR is being used to promote the CCP, I do not believe that hunting will improve wildlife habitat or increase population, there needs to be food, water, and shelter. If you destroy waterfowl feeding grounds, they will find a different feeding area. If you shoot ducks off their roost, they will find a different place to roost. I do not feel that hunting geese, ducks or any other wildlife should be permitted at Swan Lake NWR unless the health of the wildlife is at jeopardy. Swan Lake NWR was established as a "Migratory Waterfowl Refuge"; doesn't this indicate a safe haven for migrating birds? Should hunting be allowed on the refuge at all?

What impact has hunting contributed in the declining Canada goose population at Swan Lake? Canada goose numbers have changed dramatically in the last four decades, but so have management strategies. In the late 1970's row-crop fields were harvested and 100% of the grain was left for the wildlife. More conservative thinking has decreased the number of row-crop acres and the amount of grain left for the wildlife in the last 40 years. With advancing technologies in the agriculture industry to produce a more efficient harvest, waste grain has been reduced dramatically, ultimately impacting what was considered preciously as a reliable food sources for wildlife. I strongly believe this is a contributing factor in the decreasing number of Canada geese that use the area. What will happen to the wildlife population if row-crops are reduced further or totally eliminated as recommended in the CCP?

What impact will the proposed changes outline in the CCP have on the white-tail deer population and viewing opportunities? Some of the largest white-tail deer on the books have come from our area. Swan Lake NWR has produced some of the world's largest free-ranging bucks ever. The habitat is diverse and provides a sanctuary for a very healthy herd of deer due to the interspersed genes and allows high levels of gene flow within the Lower Grand River Watershed. If the crops are eliminated from Swan Lake the deer will likely feed on row-crop somewhere outside the boundaries of the refuge which will have a major impact on bordering crop yield. If more than 4,000 acres are turned into wet meadow and emerging wetlands, deer populations will become denser in fewer areas increasing the likelihood of disease transmission resulting in adverse effects on the deer herd health such as Chronic Wasting Disease (CWD) or Epizootic Hemorrhagic Disease (EHD).

I do agree with the staffing changes outlined in the CCP. I am astounded with the workload expected and carried out by the few individuals currently on staff at Swan Lake NWR. Why is there not funding for more staff at Swan Lake currently? There are many issues that have been suppressed for years due to the limited staff/cutbacks. It would be beneficial to the refuge to operate at higher staff levels that can offer areas of expertise, not just a skeleton framework of personnel. Why is it that the proposed staffing solution could not be implemented to improve the habitat that is already established? With staffing increases, funding will be made available which will allow staff to make contributions to the area that will encourage opportunity to diversify habitat. The increase in personnel must take place if any improvement efforts are going to be pursued regardless of the strategy that is chosen.

I am blessed with a very passionate personality, my experiences with wildlife have provided countless memories which have made me who I am today. I want all others to enjoy some of the same opportunities that I have in my life, thanks to the wildlife sanctuary at Swan Lake NWR. I am very concerned with the direction of the CCP and the future of Swan Lake NWR. I believe most goals of the CCP can be achieved without making detrimental alterations to the existing habitat. Why change a good thing? Give Swan Lake NWR the resources and staffing to make changes to the refuge to improve habitat diversity without eliminating its assets.

Please take my comments into consideration for our community, this magical place, its beautiful wildlife, and what it has given me.

Thank you in advance for your consideration.

Sincerely,

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