

Dear Sirs,

I am writing to comment on the draft Comprehensive Conservation Plan for Swan Lake National Wildlife Refuge. Several parts of the plan are very good and should help the Refuge during the 15 years that the plan encompasses. However there are three parts of the plan that I have to strongly disagree with.

- The drawdown of Silver Lake.

Silver Lake MUST be kept as a impoundment. It is the water source that enables refuge personnel to manage all the wetland habitats on the entire refuge. Without this guaranteed water source the waterfowl habitat during fall and spring migrations will be absent. Why would you get rid of the water source for the refuge that enables the management of wetlands at NO COST? Swan Lake has a perfect system for water manipulation. Most large wetland areas must pump water at great cost either by electricity or diesel powered pumps. Why add this type of cost to an agency of the federal government that is experiencing cutbacks during these bad economic times?

Silver Lake has many other functions. It is fantastic diver duck habitat. The numbers of all species of divers present on Silver Lake is higher than anywhere else in this area. During extremely cold periods when most water bodies freeze, waterfowl utilize Silver Lake in large numbers and keep water open that allows them a place to roost and loaf undisturbed. Silver Lake also enables refuge personnel to move water through South Pool during these cold periods that in turn keeps water open for wildlife to utilize.

The drawdown of Silver Lake is going to eliminate the fantastic catfishery that it provides. Tremendous channel cat and flathead fishing is present on Silver Lake. That would be totally eliminated with this plan. In 1989 Silver Lake was drained. Tens of thousands of fish were killed. The public outcry was tremendous. This scenario will repeat itself if this plan is implemented.

The comment is made in the CCP that drawing Silver Lake down will reduce the common carp population. This is far from true. Common Carp will always be present in Turkey and Elk Creeks and will always populate Silver Lake when water is present. Carp also move from Yellow Creek to Silver Lake during flood events, therefore the reduction of common carp numbers will never happen.

One of the challenges of a National Wildlife Refuge in such a rural setting as Swan Lake is the challenge of drawing numbers of visitors. One thing is certain, water draws people. Be it for the fishing or the aesthetics of the lake itself, Silver Lake draws people. The ability to drive around the edge of Silver Lake for miles is a tremendous attraction for the refuge.

Siltation of Silver Lake is a concern that is addressed in the CCP. As long as Silver Lake has the ability to impound enough water to serve as the refuge water source, then it is serving its most important purpose. While siltation will remain a concern, the drawdown of Silver Lake isn't going to stop the siltation.

- Elimination of row crop farming on Swan Lake National Wildlife Refuge.

The elimination of the farming program would be a huge mistake. It states in the CCP that "cropland isn't native". That's true. However many wildlife species have adapted to relying on cropland to the point that it is a very important part of wildlife habitat today. Waterfowl, upland birds, small mammals, and deer are a few of the species that feed on the crops planted on the refuge. Diversity is a term that wildlife biologists use. Cropland adds to the diversity of the habitat on the refuge. Slightly over 10% of the refuge is farmed, at no cost to the Fish and Wildlife Service, because the refuge manager utilizes area farmers on a share crop basis. Again,

another management tool would be eliminated that costs the federal government nothing. What about the impact of loss of income to the farmers that currently farm refuge property? The comment is made in the CCP that because the refuge is surrounded by agriculture, that essentially there is no need for crops on the refuge. That outlook on adjoining landowners is going to cause tremendous crop depredation on their crops when refuge wildlife leaves the refuge to feed. The Missouri Department of Conservation issues summertime kill permits yearly to adjoining landowners to kill deer due to crop depredation. This unfortunate situation would be multiplied tremendously if there were no crops in the refuge to keep the majority of the wildlife inside the refuge, rather than eating adjoining farmers crops. This sends a message to adjoining landowners of “we don’t care about your problems with wildlife”. This is certainly a message that the Fish and Wildlife Service doesn’t want to portray.

- The changing of moist soil units to “wet meadows”.

I see in the CCP that the most productive moist soil units on Swan Lake Refuge would be turned into “wet meadows”, namely those units located to the South/Southwest of Silver Lake. Those units are the most intensively used by waterfowl on the refuge. The loss of these key units would have a devastating effect on waterfowl usage on Swan Lake Refuge. If these units are not managed as moist soil units, reeds canary grass infestation will occur quickly. Reeds canary grass infestation is already occurring on the refuge in a major fashion in unmanaged areas. This non-native invasive species is useless as wildlife habitat and is extremely difficult and terribly expensive to attempt to control. Moist soil units are inexpensive and vital waterfowl habitat. Occasional soil disturbance and water fluctuation is all that is needed.

In closing I would like to point out that the entire Swan Lake area, its residents, adjoining landowners, communities, municipalities, and businesses have adapted with Swan Lake over the past seventy plus years. They rely on the recreation that the refuge supplies, from the hunting, fishing, wildlife observation, etc. The economic downturn for this area would be tremendous. Loss of business due to lack of waterfowl to landowners who lease hunting property, hotels, convenience stores, restaurants, sporting goods stores, etc. would be detrimental to this area. Swan Lake Refuge is literally surrounded by hunting properties that have evolved over the years with the waterfowl populations that Swan Lake Refuge provides. If the waterfowl no longer come here due to these parts of the CCP being implemented, the property values of these waterfowl hunting properties will plummet. As stated earlier, parts of the CCP are sound ideas that will help the Swan Lake Refuge in the years ahead, however the major landscape changes that I have addressed opposition to that the CCP proposes for Swan Lake Refuge will be detrimental to wildlife and the entire community.

Sincerely,