

Public Correspondence

**Public correspondence received
as of May 8, 2009**

WHAT DO YOU THINK ABOUT WILDLIFE AREA MANAGEMENT?



The Oregon Department of Fish and Wildlife is seeking your comments regarding management of Fern Ridge Wildlife Area. You can add your comments to the record by completing this form and turning it in tonight, faxing it to ODFW at 503-947-6009, or by sending an e-mail to ODFW.comments@state.or.us. All comments will be summarized and posted to the ODFW Web site.

Great job by all affiliated agencies in managing this local wildlife area. Best of luck to you all and enjoy the continued support of the conservation community.

Two suggestions:

① More hiking/nature trails

② Expand habitat for rare/endangered species wherever possible

Thanks !!

Greg Wobbe
Eugene

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Thank you for staying committed to protecting and providing excellent habitat for our waterfowl hunters - We appreciate this organized plan to always establish a future for our kids and grandchildren to enable a wonderful hunting experience. Please continue to give us a place like Fern Ridge to enjoy waterfowl hunting. The joy of shooting a moving target and the opportunity to enjoy duck breasts w/ mushrooms, rise and red wine (casseroles) is also a wonderful experience.

P.S. I think the bird watchers should sleep-in in order to keep away from the rare possibility of a fire and a incident.

A large, stylized handwritten signature in black ink, appearing to read "Ruben Garcia".

2103 FLYBUSH AVE
EUGENE, OR 97401

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I enjoy the way that the wildlife area currently functions. Over the past two years I have spent many mornings hunting waterfowl in the wildlife area and I appreciate the opportunity to hunt so close to the ~~the~~ City. I believe that it is important to maintain current hunting opportunities (7 days a week in most areas). It would be nice to have more blind-hunting areas open on Mon., Wed., Sat. as the blinds have become crowded. A 50% chance to go hunting (08-09) is not very good. It would be nice if ODFW could provide paper maps of the Royal/Fisher Butte area as they do at Coyote - Perhaps a grant opportunity.

It would be nice if Stats from cards were provided at some point during the season, as they ~~are~~ are provided in Coyote area. The online Stats are very nice + people look often - quite helpful. Online resources are very important + are becoming more popular - continue to use these avenues more often.

In the future, use resources at UO + OSU to do projects; there are many student org's looking for outdoor/environmental related projects.

→ Overall, nice work out there, this is quite a valuable resource to have so close to town!

I am willing to volunteer or help out w/ future planning.

Tim Brass - tbrass@uoregon.edu - 651-206-4669

Nancy Breuner

From: Wayne E Morrow [Wayne.E.Morrow@state.or.us]
Sent: Wednesday, January 21, 2009 5:35 PM
To: ODFW Comments
Cc: Nancy Breuner, Guy Springman
Subject: FW: Fern Ridge

To: ODFW Comments: Attached message below, relative to Fern Ridge Wildlife Area long range management plan process. Please confirm receipt of this message, and record Mr. Springman's comment. Thank you.

Wayne Morrow
Fern Ridge Wildlife Area
541-935-2591

From: Guy Springman [mailto:gmspringman@yahoo.com]
Sent: Wednesday, January 21, 2009 4:55 PM
To: MORROW Wayne E
Subject: Fern Ridge

Wayne, Please forgive me as I cannot attend the ODFW meeting on the 23rd which has fern ridge in it's agenda. I would just like to express the importance of having this area available to me for waterfowl hunting. I have been hunting fern ridge for almost 20 years and am raising 2 boys hunting in this area as I did growing up. I give a big Thanks to you and your staff for everything you guys do. Again, Thanks and if you could, email me and let me know you got this.

Thanks, Guy Springman

Michelle Tate

From: ODFW Comments
Sent: Monday, January 26, 2009 5:32 PM
To: Nancy Breuner; Wayne E Morrow; Michelle Tate
Subject: FW: Fern Ridge Wildlife Area

From: JENNIFER BRADBURN [mailto:BradburnClan@msn.com]
Sent: Friday, January 23, 2009 3:36 PM
To: ODFW Comments
Subject: Fern Ridge Wildlife Area

This email is in response to the plan for Fern Ridge Wildlife Area. I think the plan looks pretty good. I am a waterfowl hunter who greatly appreciates the privilege of hunting Fern Ridge. I am happy to see hunting dollars as the main monetary provider for wildlife management as long as we have the long term privilege of hunting there.

Thank you for accepting my email.

*Sincerely,
Patrick Bradburn*

Comments on FRWA HMP draft

Page 1 of 7

Nancy Breuner

From: Wayne E Morrow [Wayne.E.Morrow@state.or.us]
Sent: Thursday, January 29, 2009 2:17 PM
To: Nancy Breuner
Subject: FW: Comments on FRWA HMP draft

From: Swift, Roberta NWP [mailto:Roberta.Swift@usace.army.mil]
Sent: Friday, January 23, 2009 3:18 PM
To: Wayne E Morrow
Cc: Beal, Kat F NWP; Messinger, Wes NWP
Subject: Comments on FRWA HMP draft

Dear Wayne-

Here, at long last, are the consolidated comments on the FRWA HMP from Kat, Wes and myself. We know that this lengthy document was a huge effort and we thought that it was really well done. There were some minor errors that we found, described in detail below, but overall we support the content, tone, and intent of the draft plan. I know that you were limited by administrative constraints, but we hope that next time we can be brought into the process a little earlier so that we can offer suggestions in advance of the public review. In addition to this note to you, we are sending very brief formal comments in support of your plan through Erik Petersen.

Getting down to the details, there are some specific suggestions that we would offer for inclusion in future drafts. Some plant and animal names were misspelled or out of date and some of the species occurrence lists could also use some updating. Specific errors are noted below, but we also suggest that the bird occurrence table in Appendix B be checked against "Birds of Fern Ridge Wildlife Area, a seasonal checklist, January 2008" which I sent sent to you previously attached to an email. Let me know if you need another copy. The revised bird occurrence list might change the number of total bird species occurring and breeding at Fern Ridge that you cite on page 4 and 17. We did not conduct a complete review of all scientific names but the most up-to-date bird names can be found on the AOU Check-list of North American Birds (<http://www.aou.org/checklist/index.php3>). We also suggest some changes to the list of mammals that potentially occur and are documented at FRWA. Several spelling errors exist in the plant scientific names but not all have been highlighted in these comments so they should probably be double checked again by ODFW staff.

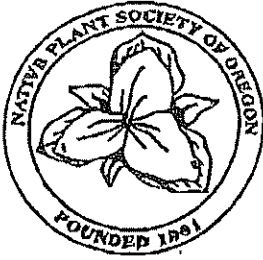
We felt that a discussion of critical habitat is missing in the document and that it would be worth emphasizing the designated Critical Habitat (see specific notes) in future drafts. It also may be worth citing the Biological Opinion for managing rare plants and insects. In addition, it seems like there is a need to clarify the distinction between some grassland vegetation types and wet prairie.

Our detailed comments are below. We are happy to assist in any way we can with the revision of the FRWA HMP. Please feel free to contact Kat, Wes, or myself with any questions that you might have.

Sincerely,

2/27/2009

RECEIVED TIME APR. 29. 3:41PM



NATIVE PLANT SOCIETY OF OREGON

Dedicated to the enjoyment, conservation and study
of Oregon's native plants and habitats.

February 9, 2009

Oregon Department of Fish & Wildlife
3406 Cherry Avenue NE
Salem, OR 97303

Dear ODFW Planners:

Thank you for the opportunity to respond to the Draft Fern Ridge Wildlife Area Management Plan-January 2009.

The Native Plant Society of Oregon, dedicated to the enjoyment, conservation and study of Oregon's native plants and habitats, frequently comments and provides technical guidance on local as well as regional natural resource issues pertaining to native plants.

We strongly support the Draft Plan's Goal 2, Objective 2.1 that encourages protection and enhancement of native wet prairie habitat, of which less than 1% of the original remains. Native wet prairie is becoming increasingly rare throughout the Willamette valley. We are also encouraged by the Draft Plan's Objective 2.2 and 2.3 which provides similar goals for oak woodlands and upland prairies, also considered vanishing habitat types for native plant communities. All three of these types are defined as strategy habitats in the 2006 Oregon Conservation Strategy (OCS) which is, encouragingly, stressed in the Plan document. As you state on Page 22 and 23 of the Plan, native wet prairies support a number of rare and uncommon plant species deserving of protection. These include federally listed regional endemics *Lomatium bradshawii* (Bradshaw's Lomatium), *Erigeron decumbens* var. *decumbens* (Willamette valley daisy)

Emerald Chapter • Emerald@NPSO.org • P.O. Box 902 • Eugene, OR • 97440-0902

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ODFW WILDLIFE

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and *Lupinus sulphureus* ssp. *kincaidii* (Kincaid's lupine). Additional uncommon plants of this habitat which deserve at least some form of administrative protection and may in the future be federally listed R&E's include *Cicendia quadrangularis* (timwort), *Sericocarpus rigidus* (rigid white-topped aster), *Sisyrinchium hitchcockii* (Hitchcock's blue-eyed grass), *Lathyrus holochlorus* (thin-leaved pea), *Horkelia congesta* ssp. *congesta* (shaggy horkelia), *Pyrococoma racemosa* (racemed goldenweed) and *Calochortus uniflorus* (large flowered star-tulip). Most of these are designated 2006 OCS species.

Other species, though not necessarily rare, which contribute to the ecological importance and diversity of these wet and upland prairie habitats include *Camassia quamash* var. *maxima* (small camas), *Saxifraga oregana* (Oregon saxifrage) and *S. integrifolia* (western saxifrage), *Sidalcea malviflora* ssp. *virgata* (rose checkermallow) and *S. campestris* (meadow checkermallow), *Wyethia angustifolia* (narrowleaf mule's ear) and *Lupinus polyphyllus* (large leaved lupine).

The Draft Plan's increase in acreage to the Amazon Dike #2 Unit contain known populations of Kincaid's lupine and the Fender's blue butterfly as well as racemed goldenweed and Bradshaw's lomatium. The East Coyote Unit has a documented population of *Delphinium oregonum* (Willamette valley larkspur) as well as Willamette valley daisy. Fisher Butte contains additional populations of Willamette valley daisy, large flowered star-tulip, shaggy horkelia and Bradshaw's lomatium. *Sagittaria latifolia* (wapato) thrives along Coyote Creek in the Fisher Butte unit as well as along the lake edges in the Applegate Unit. *Cyperus bipartitus* (shining flatsedge), on the Emerald Chapter NPSO R&E list, has been documented along the eastern edge of Kirk Pond.

On Page 16 you discuss the Research Natural Areas (RNA's) of the Fern Ridge Area. We urge you to continue cooperation with the Corps of Engineers to assure continued protection and enhancement of these areas which contain all three federally listed R&E plant species previously mentioned.

Finally, as discussed on pages 24 and 25 of the Plan, we fully support your efforts to diligently control and reduce the presence of noxious and introduced plant species (e.g. reed canary grass, purple loosestrife, Scot's broom, water milfoil, tall

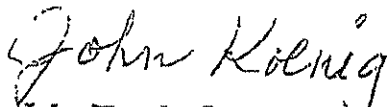
oatgrass, tansy ragwort, Himalayan and evergreen blackberry) which threaten both native habitats and plants.

We would be pleased to be considered a potential partner for exchange of technical expertise on native plant related issues as they pertain to the management of the Fern Ridge Wildlife Area, outlined in Strategy 5 of Objective 2.1 on Page 40 of the Draft Plan.

Emerald Chapter, NPSO, envisions the Fern Ridge ecosystem as a natural area in perpetuity with restoration efforts directed toward reestablishing native plant communities, elimination of invasive exotics, and protection of existing rare plant populations. This in turn will greatly enhance the area for native wildlife.

Thank you for the opportunity to comment.

Yours sincerely,



John Koenig, Conservation Co-Chair

Emerald Chapter, Native Plant Society of Oregon

Roberta

<<FRWA_HMP_Comments2WayneFinal.doc>>

Specific comments by page:

P. 8, Figure 1, Shows Jean's Park as leased to the county.

It is managed by the Army Corps of Engineers.

P. 12, Figure 2:

Map key does not indicate royal blue color delineating winter minimum pool.

p. 13, Wetlands paragraph 2:

We don't have a record of Puccinellia at FR and OSU herbarium database has no records for the Willamette Valley; We don't have a record of Cinna at FR, although it occurs in Lane County; We don't see field mint as being particularly typical of our marshes. Did the author mean pennyroyal?

P. 13, paragraph 3: Wetlands

"Project operation for flood control purposes provides a hydrologic environment..."

P. 13, Wet Prairie

There seems to be a confusing lack of distinction between wet prairie and grassland sections.

The paragraph on wet prairie lists species from both upland and wet prairie; We have no record of Phragmites, which is known from the coast in Lane County.

Grasslands

The listed Willamette daisy taxon is Erigeron decumbens ssp. decumbens (the species is not listed).

P. 15, paragraph 4 -Fern Ridge Reservoir Operations...

"... bald eagles benefit from the available prey base and..."

P. 17, paragraph 2: Biological Resources

The total number of birds shown is low compared to the most recent bird list assembled by the Army Corps of Engineers for Fern Ridge lake. A more accurate total would be 295 counting those on the newest Fern Ridge bird checklist and three incidentals seen in 2008 (wood sandpiper, brown pelican, fork-tailed storm-petrel). A bird list update would also probably increase the number of breeding birds.

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P. 17, paragraph 3, Birds

Misspelled bird names:

White-tailed kites

Black-necked stilts

Waterfowl

Canada goose names need updating:

Cackling goose = *Branta hutchinsii minima*

Taverner's = *Branta hutchinsii taverneri*

Lesser = *Branta Canadensis parvipes*

Aleutian = *Branta hutchinsii leucopareia*

Marsh Breeding Birds

Wilson's snipe = *Gallinago delicata*

Caspian tern = *Hydroprogne caspia*

White pelicans and caspian terns are not technically marsh breeding birds. Consider placing them under separate heading.

Shorebirds

Spotted sandpiper = *Actitis macularius*

Dunlin = *Calidris alpina*

(Our review of the shorebird names was not complete. Please reference the most recent AOU checklist for updated names.)

P. 20, Upland Birds

Blue grouse does not occur on FRWA according to our most recent list

Mammals

Lutra canadensis (specific name should be lower case)

Striped skunk = *Mephitis mephitis*

Occurs again in table p. 64

Genus *Mustela* has only one "f" ie. *Mustela* NOT *Mustella*

See also *Mustella* (sic) *erminea* table p. 64

Virginia opossum = *Didelphis virginiana*, NOT *virginianus*

Occurs again table p. 64

P. 21, Amphibians and Reptiles

Pacific chorus frog = *Psuedacris regilla* (formerly *Hyla regilla*)

Western skink = *Plestiodion skiltonianus*

Pacific gopher snake = *Pituophis catenipher*

Suggestion: double check all amphib & reptile names for correct spellings and most current classification.

Fish

Period in final paragraph before "pumpkinseed" should be replaced with comma

We did not check fish scientific names.

p.22

Critical Habitat designation for Willamette daisy, Kincaid's lupine, Fender's blue butterfly designated 2006 includes most grasslands on E & NE shore (indeed most grasslands in FRWA except Kirk). Recovery plan for prairie species will depend on Fern Ridge populations for success.

Current nomenclature for Kincaid's lupine is *Lupinus sulphureus* ssp. *kincaidii*, it is not usual to leave out the infraspecific taxon designator as it is with wildlife since there are several choices.

RNAs should read RNA (there is only one, with several units)

Microcala is now *Cicendia*; *Aster curtus* is mis-spelled, more recent nomenclature designates it *Sericocarpus rigidus*, but 1st OK (it's in the listing documents); *Sisyrinchium hitchcockii* is not in my records, ORNHIC database doesn't show any at FR, but we should make a concerted effort to find it.

P. 23, Table 3

Should read: "Species known to occur or potentially present..."

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Consider including breeding status of these species. For example snowy plover does not breed at FRWA and is such an infrequent visitor, it's not worth managing for.

P. 24 table

as above and Horkelia congesta ssp. congesta is the listed taxon

p. 25, end of paragraph 1.

append: "Meadow knapweed threatens to overrun several important grassland sites, and appears to be increasing, often dispersed on county road maintenance equipment from."

p. 33

The West Eugene Wetlands "WREN" program regularly leads interpretive activities at Fern Ridge. FRWA participates in Wings and Wine

All lands owned by USACE are not opened to hunting – hunting is not allowed in established recreation areas including Richardson, Orchard, Zumwalt, and Perkins Parks.

p. 28 Paragraph 3 should read: "From mid-April to mid-October...."

p. 39

Pond turtle strategy should not go under objective 2.1: protect and enhance 414 acres of wet prairie

p. 41

there seems to be some confusion about concept of grassland vs. wet prairie

Paragraph 2: delete one period after "woodlands"

p. 48

found typos in the plant list Berberis aquifolium, Corylus avellana, Symphoricarpos are the corrected spellings.

p. 58; Appendix B. Birds

Birds missing:

Yellow-billed loon

Clark's grebe

Fork-tailed storm petrel

Brown pelican

Snowy egret

Cattle egret

Trumpeter swan

Ross's goose

Emperor goose

Ross's goose

Brant

Cackling goose (now a separate species from Canada)...

(This is not a complete list. Please reference most updated copy of Fern Ridge Bird list for additional species.)

Incorrect names:

Green-backed heron is now called Green heron

Black-shouldered kite is now White-tailed kite

(Please reference most recent AOU checklist for correct scientific and common names)

p. 64, Table Mammals

Townsend's Big-eared bat, *Plecotus townsendii* is now *Corynorhinus townsendii* ;

Potential; Documented in Lane County (Eugene & Creswell) but not at FRWA, (Verts and Carraway, 1998)

Hoary bat (*Lasiurus cinereus*)

Uncommon in western Oregon. Not documented at FRWA, (Verts and Carraway, 1998)

Silver haired bat (*Lasionycteris noctivagans*)

Rare in Oregon. Not documented at FRWA (Verts and Carraway, 1998)

Table Amphibians and Reptiles

Native Painted turtles don't occur at FRWA, may be records of released pets

Spotted frog occurred historically but now probably extirpated from FRWA – not documented at FRWA

Foothill yellow-legged frog = *Rana boylei* (not *Rana boylei*)

Not likely at FRWA; not documented

Western Rattlesnake: Typo "C)"

Western pond turtle = *Clemmys marmorata*

p. 74, final paragraph:

One of the largest remaining populations of Willamette daisy occurs on this unit of the RNA.

Kincaid's lupine and Fender's blue butterfly occur in a remnant wet prairie parcel at the north end of the management unit.

Occupied rare plant and insect habitat in this management unit is included in the 2006 critical habitat designation.

P. 76, paragraph 2

huckleberry is the common name, and *Vaccinium cespitosum* is the species. I recently determined the violet in the RNA as *Viola odorata*, an exotic also a problem at Willow Creek; and the lichen is spelled *Cladonia*

p. 76, final paragraph

Kincaid's lupine is listed threatened, not endangered. Bradshaw's lomatium occurs here. A small stand of Kincaid's lupine persists on one of the mounds. The RNA portion of the management unit is included in Critical Habitat for Fender's blue butterfly.

Thank you for the opportunity to review and comment on your draft Management Plan (Plan) for Fern Ridge Wildlife Area (FRWA). These comments are provided from the the staff of Willamette Valley National Wildlife Refuge and the Division of Migratory Birds and Habitat Programs. These comments are separated under the three goals within the Plan.

Overall, we believe the planning concepts and approach to establishing goals and objectives are sound. We offer some suggestions for increasing use of FWRA by geese in order to reduce conflicts in the vicinity of Fern Ridge Reservoir. We commend the compilation and detailed presentation of the ecological and historical setting of the FRWA as introductory information in order to evaluate your management goals and objectives.

In numerous technical comments, we suggest expressing more detail about the underlying biological goals and being more explicit about the life history stages of targeted wildlife; for example, Goal 1 states “attract and support waterfowl”. Likewise, Goal 2 is to “protect, enhance, and restore habitat diversity for other wildlife” but in the step-down objectives identify protecting “wet prairies, oak woodlands, and grasslands” without specifying restoring with native plants/animals or enhancing existing conditions. These statements would be more useful for readers and managers; and progress could be more explicitly evaluated if they read “protect, restore and enhance” native ecosystems with native plants and animals.

It appears as though the three goals are listed in priority order due to statements about how Goals 2 and 3 should be compatible with the other goals. If this is the case then the Plan should specify that the goals are listed in priority order.

Goals 2 and 3 include the use of the term compatible when referring to the other goals. It is not clear as to how ODFW will determine compatible actions and uses. The USFWS has a formal definition for compatibility when evaluating whether secondary uses on a national wildlife refuge will affect the stated purpose of the refuge and this information could be provided to ODFW upon request. A definition of compatible and an explanation how ODFW will determine whether or not an action would be allowed should be included within the Plan.

The Plan lacks sufficient information regarding fisheries resources on the FRWA. There should be some discussion regarding how fisheries resources may be affected from water management activities within the waterfowl impoundment areas where fish entrapment/passage could be a concern.

The Plan should identify both funding and staffing needs associated with implementing the various goals, objectives and strategies. It isn't clear whether sufficient resources (on Page 47) exist in order to carry out the Plan and as such it could be interpreted that all of these activities are going to occur in the near future. Also, some type of implementation plan/schedule would also be beneficial.

We would recommend more specific linkages on goals, objectives between this Plan and the Oregon Conservation Strategy (OCS), the 4 major bird initiatives being implemented by the Pacific Coast Joint Venture and any other regional or national conservation planning effort.

Goal 1: Manage habitats to attract and support waterfowl in the southern Willamette Valley.

The wetland acreage figures listed under Goal 1 do not appear to relate to any waterfowl (or other wildlife) population numbers. It would be helpful if there was a presentation on correlation between the amount of wetland habitat and the desired number of waterfowl. In other words, the amount of wetland habitat should be based somewhat on the number of ducks and geese or other wetland related wildlife species that the FRWA is attempting to support. We support the work of the Pacific Coast Joint Venture and others to develop predictive habitat and population models. Developing your habitat goals from these types of predictive models would integrate population and habitat efforts.

It is not clear if the wetland acreage figures listed under the objectives are the present acreages on the FRWA or target acreages. We encourage ODFW to evaluate the potential to increase the amount of wetland habitats on the FRWA through restoration activities. We applaud ODFW for the progress in restoring wetland habitats on the FRWA in recent years and suggest this effort be continued and that objectives under this goal should represent acreage levels beyond the current levels. Over 1 million acres of wetland habitat has been lost within the Willamette Valley and every effort needs to be made to increase the occurrence of this valuable habitat type.

The various types of wetlands should have specified desired conditions or attributes in addition to the acreage targets. Management effectiveness would be increased if there were definitions of the desired plant species composition, level of invasive species that may be tolerated, when certain management or control activities would occur, etc. The preliminary text of the Draft Comprehensive Conservation Plan (CCP) for the WVNWRC contains this type of information and we could make this information available to ODFW upon request. Including more information about the desired conditions of wetland habitats will allow ODFW and others to determine the success of various management activities on the FRWA.

The Plan should further develop strategies to provide habitat for Canada/cackling goose on the FRWA and surrounding area. The Plan references that 50,000 Canada/cackling geese use the FRWA without much management emphasis is placed on these birds. Goose use of the FRWA has increased significantly in recent years and with increasing agricultural crop depredation on nearby private lands. The proximity of the Eugene Airport creates concern about the possibility of bird strikes with aircraft. We encourage ODFW to include more strategies with respect to how FRWA could provide improved/additional habitat for geese and thereby possibly reduce the use on nearby private lands. We suggest that ODFW consider increasing goose use on the FRWA by

managing for green browse and evaluating whether disturbance from public use programs limits goose use of the FRWA.

Objective 1.1

It would be helpful if there was an explanation regarding the variability in seasonal (40-80%) and semi-permanent/permanent wetlands (10-40%). When and how would decisions be made to alter the management of these areas? We agree a diversity of the various types of wetlands is desirable; however, the primary emphasis should be placed on seasonal wetland habitat as that type of habitat is generally more productive within the Willamette Valley with respect to providing food for wintering waterfowl populations.

In Strategies 1-3, there is a heavy emphasis on maintenance of critical physical infrastructure with no mention of needs in terms of heavy and disposable equipment, replacement cycles, or staffing levels to accomplish this work. It would strengthen the plan and overall management if information was presented on the amount of resources necessary to accomplish this work.

The habitat values and maintenance costs of the impoundments below full pool level are unclear to the reader. Given that they are flooded throughout the growing season and only exposed during the drawdown period, what wildlife benefits from these areas? What are the maintenance issues associated with the structures?

Strategy 4 specifies that up to 180 acres of traditional food plots would be planted for waterfowl. It appears from the list of crops mentioned that the primary purpose is for duck food as there is no mention of any green forage crops for Canada geese. We would encourage ODFW to consider incorporating some green forage crops such as ryegrass or a pasture mix of various grasses and legumes that would provide habitat for Canada geese. We would also encourage ODFW to ensure that at least a portion of these food crops are within closed areas to minimize disturbance to Canada geese from public use. Also, we suggest that sunflowers be deleted from this objective as it is more of an upland game bird food source.

Strategy 6 addresses invasive plant species such as reed canary grass. We suggest that it would be valuable to promote exchange of management information between our land management experts since we have many of the same issues and have had successes with some control methods. We suggest adding invasive animal control strategies.

We would encourage ODFW to include a strategy to manage part of the wet prairie and grassland habitats on the FRWA for wintering Canada goose use. These areas should be prescribed burned and/or mowed more frequently in order to provide enhanced green forage supplies for Canada geese.

The Plan states that numbers of waterfowl and shorebirds have increased significantly over the past 25 years in direct response to wetland habitat management. This statement should refer to use trends of waterfowl and shorebirds on the managed habitat within the FRWA and not on Fern Ridge Reservoir that is managed by the Corps of Engineers, and

should be shown with a corresponding table, graph, or other illustration. It should also delineate breeding and wintering population numbers.

Objective 1.2

Sanctuary needs to be well defined in temporal and spatial terms, so that hunt areas that are not hunted for the entire day are not labeled sanctuary for the balance of the day. While we agree that the hunting pressure on the Reservoir is light, we also do not necessarily agree that Fern Ridge Reservoir acts as a 'defacto' sanctuary as it is open to hunting 7 days per week. It doesn't take much boat traffic to disturb the waterfowl use on the lake.

The one-week period between the end of the pheasant hunting season and the opening of the duck hunting season is also not sufficient time to serve as effective sanctuary.

The range of 15-30% sanctuary for the FRWA is considerably lower than the legislated 60% sanctuary standard for National Wildlife Refuges purchased with federal duck stamp funds. We encourage ODFW to evaluate whether additional sanctuary is needed in order to provide undisturbed habitat that contains both adequate amounts of food and water for Canada geese and other wildlife. We would also suggest that additional sanctuary may improve the waterfowl hunting program. An evaluation of the new sanctuary south of Highway 126 along with an analysis of the hunt program changes that were made in 2006-07 when some of the areas that had been open to hunting 4 days per week were increased to 7 day per week hunting would be helpful. The need for sanctuary after the hunting season closes should also be a part of this evaluation.

Objective 1.3

The Plan specifies that 1,000 acres of grassland habitat (in addition to an undetermined acreage of permanent/semi-permanent wetlands for brood rearing) are provided for nesting habitat for dabbling ducks. We suggest evaluating breeding duck count information, availability of suitable water bodies for territorial pairs, brood water availability, Willamette Valley nest success rates and other information to evaluate if this objective is realistic. We believe that this analysis will help determine the how much emphasis should be placed on breeding waterfowl management as the primary goal of the FRWA. Are any areas open to dog training during duck season? We suggest ODFW should emphasize providing wintering waterfowl habitat. Also, any use of grasslands by nesting waterfowl should be secondary to the needs of those species of conservation concern in the Oregon Conservation Strategy (OCS) that depend on grassland habitat.

Objective 1.4

The lakebed management depends upon how the Corps of Engineers is managing water levels within Fern Ridge Reservoir and thus is largely out of the control of ODFW for wildlife management purposes. For this reason it may not warrant an objective in the Plan.

The strategies listed under this objective, regarding monitoring of wildlife species within the lakebed area should occur in the context of monitoring wildlife populations on the

entire FRWA. Monitoring of bird response to management is critical for evaluation of the habitat programs and should be included under Goal 1 instead of a strategy under Goal.

Goal 2: Protect, enhance and restore habitat diversity for other wildlife present on the area, compatible with Goal 1.

The habitat acreage figures for wet prairie, oak woodland and grasslands do not appear to be based on any type of corresponding wildlife or plant population target levels from the OCS or landbird, or any other large-level needs assessment or plan. There should be a correlation between the desired amount of habitat and target levels for wildlife and plant populations especially those species that are rare and endangered.

Is it not clear if the habitat acreage figures listed under this goal represent the present level on the FRWA. If so, the Plan should specify that these are the existing levels. We encourage ODFW to evaluate the potential to increase the amount of these unique habitat types on the FRWA thru various restoration activities. All of these habitats have experienced significant reductions from historical levels and every effort needs to be made to increase their presence.

The various types of habitat listed under this goal should each have specified desired conditions or attributes. Define the desired plant species composition, level of invasive species that may be tolerated, when certain management or control activities would occur, etc. The preliminary text of the Draft Comprehensive Conservation Plan for the WVNWRC contains this type of information for these habitats and we could make this information available upon request. Including more information about the desired habitat conditions will allow ODFW and others to determine the success of management activities on the FRWA.

Since FRWA is identified as a Conservation Opportunity Area in the Oregon Conservation Strategy (OCS), the Plan should link recommended conservation actions/benefiting species with references to the OCS.

Objective 2.1

The background paragraphs for wet prairie and grasslands provide no real distinction between each other because the grasslands are generally described as wet prairie with associated listed species. We suggest a division of wet prairie, upland prairie (with at least some native component), and something like “non-agricultural grasslands” for those areas with little or no prairie component. Again, the preliminary text of the WVNWRC Draft CCP may be a helpful reference for you on this matter.

The Plan mentions that the Corps of Engineers has the lead on endangered species management, as well as management of the Research Natural Area (RNA). If this is the case it needs to be clearly stated and that ODFW has a cooperative role. In either event, the Plan needs to include the strategies for endangered species management on the FRWA. We would encourage ODFW to include specific strategies on the management

actions that will be employed on the FRWA to benefit federally listed threatened and endangered species such as Fender's blue butterfly, Kincaid's lupine, Bradshaw's lomatium, and Willamette daisy, as well as state listed species. We recommend that specific management strategies for the RNA should also be included in the Plan.

It unclear how the 414 acres of wet prairie relate to the 1,000 acres of grassland in Objective 1.3? If the wet prairie is adjacent to "other" grasslands, we recommend they be managed as the largest block possible to benefit grassland species as listed in the Oregon Conservation Strategy.

Objective 2.2

The oak woodland description alludes that Himalayan/evergreen blackberries, rose, and hawthorn occupy open meadow areas in the transition zone, and although invasive, have some benefits. In general, all of these species, including the native rose and hawthorn, are known to degrade the value of oak habitats to oak dependent species. Douglas fir trees are also a threat to oak woodlands, and all these species are there because of the exclusion of fire.

Strategy 3, why is fencing needed to exclude livestock? We didn't see any other reference to the use of grazing as a management tool on FRWA.

Objective 2.3

The Plan specifies that 764 acres of grassland habitat would be protected and enhanced. However, the rationale discusses wet prairie attributes and the RNA. How is this different than the 1,000 acres for nesting waterfowl and 414 acres of wet prairie? There seems to be some overlap as to the designation of grassland and wet prairie habitats.

Strategy 3, it should include active control of noxious weeds, not just monitoring.

Goal 3: Provide a variety of recreational and educational opportunities to the public which are compatible with Goals 1 and 2.

The Plan makes a reference to non-firearm recreation. What types of recreation is this referring to? We suggest using non-consumptive use when referring to recreation uses that do not involve firearms or other types of weapons.

We have a concern regarding the put and take pheasant hunting and how the program as currently designed may not be compatible with your higher priority goal of providing for waterfowl on the FRWA. Part of the pheasant hunting area is within the East and West Coyote Units which are managed impoundments for waterfowl. It is our understanding that these units have pumping stations and the associated infrastructure that provides the capability for them to be filled with water from Coyote Creek. The pumping however must occur early enough in the fall before the Corps of Engineers begins to dewater the Reservoir and the level in the Creek drops such that the pumps are no longer operable.

In the past few years there hasn't been much water available within the Coyote Units during the fall period. Last year these units didn't get flooded until December when sufficient precipitation occurred. It appears as though you may be delaying flooding these units in order to leave them dry for the pheasant hunting program. By the time the pheasant hunting season is over the Creek is apparently too low in order to pump from it. The delayed flood-up of these units is reducing their overall waterfowl use and limiting the duck hunting program. In order to resolve this issue, we suggest that you consider relocating the pheasant hunting to an area that doesn't impact your higher priority goal of providing waterfowl habitat. We encourage ODFW to take full advantage of the availability of pumps and water within the Coyote Creek Units in order to maximize their value as waterfowl habitat. We believe that pheasant hunting could be relocated to the area north of Highway 126 where it wouldn't conflict with the waterfowl management program. It is our belief that increasing the amount of flooded quality wetland areas during the fall months on the FRWA would improve the overall waterfowl use and increase duck hunting use/success.

We are concerned that there may not be sufficient areas where bird watching can occur without concurrent hunting during the waterfowl season. In light of the shift in demand to non-consumptive use as recognized in the introduction of the Plan, consideration should be given to developing bird watching areas that are not within the hunting area.

Is there an evaluation of how the recent hunting changes have affected hunter success or the number of hunter use-days? It appears as though the overall waterfowl hunter success is not as high as on many of the other state managed wildlife areas within the state. We are aware that the FRWA has been working to improve the waterfowl hunting program in recent years and would encourage ODFW to continue to implement measures that would improve this program.

The Plan states that the hunting framework tries to find a balance between hunters and non-hunting visitors. Yet the next sentence says regulations will be modified to find a balance between the biological needs of waterfowl while accommodating diverse hunting. Non-hunting seems to have been deleted from this discussion.

Objective 3.1

Strategy 1 (surveys of waterfowl use and distribution) should be listed under Goal 1 on waterfowl and not under Goal 3 which relates to public use. It would be beneficial to include the purpose for obtaining this data under Goal 1, and explicitly linking evaluation of habitat quality and the success of management activities.

Strategy 4 on exploring options to improve angling on Fern Ridge Lake sounds more like a task for the Corps of Engineers than for ODFW as the Corps manages the various boating access areas to the Lake. How will this affect winter use and the "defacto" sanctuary provided by the Lake?

Strategy 9, do you have disabled hunter access now and will this expand or remain status quo? If yes, do you advertise the availability?

Strategy 10, what criteria will be used to decide when/how to make adjustments in hunter use? Suggest that you indicate that factors such as hunter numbers, hunter success, possible impacts to wildlife use, possible conflicts with non-consumptive use activities, costs, etc. would all be considered before making adjustments in hunter use.

Objective 3.2

Strategy 1, 2, 6. These are all interesting strategies and may be effective methods of involving more people in FWRA and its programs, but there needs to be more analysis on the needs of the public, focus of the programs and objectives.

Strategy 5, we applaud your recent efforts to partner with the Corps of Engineers regarding the development of wildlife observation structures such as the overlook facility constructed in the Fisher Butte Unit and encourage ODFW to continue these efforts.

Strategy 7, Suggest that you partner with the Corps of the Engineers and universities to develop the process, then FRWA staff can help with the monitoring protocol as developed.

Strategy 8. Access will be provided for wildlife viewing that is not in conflict with biological needs of wildlife and area's hunting program, which appears to establish a public use priority of hunting. If this is the case, clearly state it in the Plan. Otherwise, the Plan should state that it seeks a balance for all users. Hunting is <1% of all recreational use on Fern Ridge.