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PUBLIC REACTIONS TO PROPOSED RECOMMENDATIONS  
ON MANAGEMENT OF THE NATIONAL WILDLIFE REFUGE SYSTEM

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U.S. Fish and Wildlife Service

July 25, 1978

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U. S. Fish and Wildlife Service

Public Reaction to Proposed Recommendations on Management of the NWRS

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- Public Reactions to Proposed Recommendations on Management of the NWRS

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## SUMMARY

This spring the U. S. Fish and Wildlife Service (FWS) solicited public comments on the Task Force Report and Director's proposed recommendations concerning the management of the National Wildlife Refuge System (NWRS). Our analysis is intended to summarize and aid the Director in interpreting those public comments.

All 2,032 responses received before June 16, 1978 were read by members of the analysis team. The procedure employed was similar to Codinvolve, a system the U.S. Forest Service developed in order to analyze large quantities of public input. An attempt was made to capture the respondents' views concerning each of the 26 proposed recommendations. Other information, such as the respondent's source of information about the Report and the type and location of the respondent, was also obtained. All of the information was then tabulated by computer.

The 2,032 pieces of correspondence received before the June deadline can be grouped into two general categories--single-issue and comprehensive responses. The former were generally abbreviated comments written in response to organizational alerts or media accounts, rather than the Report itself, and were concerned with one central theme (e.g., consumptive use of wildlife resources on refuges). The latter were more substantive in nature and generally considered a broader range of recommendations. (See Table)

### Distribution of Responses

<u>Comprehensive Responses</u>		<u>Single-Issue Responses</u>	
<u>Group</u>	<u>Respondents</u>	<u>Group</u> <sup>1/</sup>	<u>Respondents</u>
States (42)	55	Friends of Animals	1,132
Federal Agencies	4	Defenders of Wildlife	214
Local Governments	2	Other Nonhunters	70
Non-governmental Organizations		Hunters	185
- National	19		1,601
- Regional/State/Local	57		
FWS Employees	49		
Members of Congress	4		
Other Individuals	<u>241</u>		
	431		

<sup>1/</sup> This classification of single-issue responses by source of information is meaningful since respondents generally agreed with the arguments posed in their respective sources of information about the Task Force Report.

Over 90 percent of the respondents addressed the issue of hunting and trapping on wildlife refuges, covering the full spectrum of opinion with their comments. For example, the Friends of Animals responses want hunting and trapping banned on wildlife refuges, while the hunter responses strongly oppose any additional controls on hunting. Most of the other responses lie somewhere in between. The responses from FWS employees and states agree almost unanimously with the Director; the Defenders of Wildlife responses agree unanimously with the Task Force; and the nongovernmental organizations are split, although a majority favor the Director's position on this issue of hunting and trapping by more than 3 to 1.

Over 65 percent of the respondents commenting on Recommendation 9, the organizational question, disagreed with the Director, including 34 of 38 FWS employees addressing this issue. Almost all of those disagreeing with the Director supported the Task Force recommendation (9B) that the NWRS be given more centralized direction and a clearer status within the FWS. Rationales frequently cited in favor of the Task Force recommendation included:

- The program system creates management problems for individual refuges;
- Refuge personnel need to be responsible to a single line of authority; and
- The program system results in illogical funding for refuges.

The recommendations dealing with the degree of naturalness in the management of refuges, Recommendations 6, 14, 17, 18 and 21, also generated a relatively high number of comments. About 300 respondents, including all of the Defenders of Wildlife single-issue responses, urged that only activities beneficial to wildlife be permitted on refuges. They felt that grazing, haying, timber cutting, mining, and using pesticides were all inappropriate activities for wildlife refuges. Many favoring more natural management practices urged that the Task Force recommendations be accepted over the Director's proposed recommendations. Conversely, respondents supporting the Director's position, including about 75 percent of the FWS employees responding, argued that active management is often necessary for wildlife, and that curtailment of activities with little appreciable impact on wildlife would go against the principle of multiple use.

In conclusion, the findings indicate that the issues which evoked the most controversy were those pertaining to hunting and trapping, the question of organization, and the degree of naturalness in the management of refuges. Nonetheless, with the exception of these three issues, respondents generally supported the Director's proposed recommendations. All the comments written in response to the Report will be extremely useful in rethinking and clarifying the entire range of recommendations on the future of the National Wildlife Refuge System.

## INTRODUCTION

### Background

Early in the planning of the study to be conducted by the National Wildlife Refuge Task Force, a decision was made to solicit the views of the public about the recommendations to be developed. To achieve this goal, several additional actions were taken. After receipt of the Task Force Report last January, the Director added his comments and outlined the recommendations for the management of the National Wildlife Refuge System (NWRS) he would propose to the Assistant Secretary for Fish and Wildlife and Parks. A brief synopsis of each of the Task Force recommendations along with the Director's reaction, i.e., proposed recommendations, appears in Table 1.

A 49 page booklet containing this material was made public in late March.<sup>2/</sup> In the preface to the Report the Director specifically asked for review and comment on his proposed recommendations. The public was encouraged to submit written comments before May 15; however, for the purpose of the analysis any comment received by June 15 was incorporated into the data base.

To assure as broad a distribution of the Report as possible the Service prepared a press release announcing its availability and requesting public comment.<sup>3/</sup> In addition, a notice of availability was published in the Federal Register. Finally, more than 7,000 copies of the booklet were distributed to a variety of recipients as indicated in Table 2.

The Report and its recommendations received wide exposure in many diverse publications. For instance, an Associated Press wire story emphasizing the controversial question of hunting on refuges (Recommendation 25) was reported by at least seven newspapers. In addition, outdoor columnists discussed the Report in print and interest group publications featured the Report.

Many of those who prepared comments identified or included news clippings and other published material about the Report with their responses. Fish and Wildlife Service (FWS) Regional Offices were requested to provide copies of any such articles they were aware of. While undoubtedly incomplete, the 33 media accounts accumulated in this manner probably provide a fair sampling of the additional exposure of the public to the Report and its recommendations. Knowledge of the respondents' sources of information about the Report is potentially important in understanding the nature and significance of the comments received.

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<sup>2/</sup> See National Wildlife Refuge Study Task Force. Recommendations on the Management of the National Wildlife Refuge System With Comments by the Director U. S. Fish and Wildlife Service. Washington: U. S. Fish and Wildlife Service, February 1978. Hereafter this publication will be referred to as the Report. A copy of the Report is included in Appendix A.

<sup>3/</sup> Federal Register, Vol. 43, No. 61, March 29, 1978, Page 13,102.

Public Reactions to Proposed Recommendations on the Management of the NWRSTable 1 - Summary of Recommendations

<u>Task Force Recommendations</u>		<u>Director's Recommendations</u>
<u>Subject</u>	<u>Synopsis</u>	
<b>I. MISSION</b>		
1. Refuge System Mission	Modify slightly to emphasize meeting society's needs for benefits associated with wildlife and wildlands.	Accept with some changes
<b>II. SIZE OF THE REFUGE SYSTEM</b>		
2. Size of NWRS	System should be open ended and compatible with long range plans for acquisition and development.	General concurrence
3. Additional Migratory Bird Refuges	Need more refuges in breeding grounds, along flyways and on wintering grounds.	Support with idea that RF system not sole solution
4. Acquisition of Habitat for Other Wildlife	Expand System to accommodate species other than migratory birds.	Full support but expand types of areas acquired
5. More Land Acquisition Funds	Use more general funds to supplement land acquisition accounts.	Full support
<b>III. WILDLIFE OBJECTIVES AND POLICIES</b>		
6. Naturalness and Wilderness	Consider naturalism and purposeful manipulation virtues; avoid insensitive development; if possible, manage areas for wilderness-like conditions.	Support with idea that some active management may be necessary.
7. Refuge Management Plans	Plans for each refuge must be aimed at meeting long range goals of flyways and refuge system.	Plans for each refuge must contribute to accomplishment of FWS objectives and goals
8. Habitat Outside Refuges	Work to meet wildlife needs outside NWRS.	Full support
<b>IV. ORGANIZATION</b>		
9. Organization	FWS needs to restructure its organizational pattern; NWRS needs more visibility and centralized direction; Program Management System should be carefully evaluated.	Accept visibility, but reject reorganization. Support PMS evaluation
<b>V. ADMINISTRATION</b>		
10. More Funds for Operating Refuges/User Fees	Seek more funds and consider charging user fees.	Support, but consider user fees with caution
11. Public Participation	Full cooperation with other organizations and agencies. Need public input in planning/implementing programs.	Strong endorsement but leave final decisions to FWS
12. Communication	Increase communication within and outside Refuge System.	Full support
13. Social Work Programs	Operate social work programs to minimize loss of staff time from refuge activities.	Supports



Public Reactions to Proposed Recommendations on the Management of the NWRSTable 1 - Summary of Recommendations (Continued)

Task Force Recommendations	Synopsis	Director's Recommendations
Subject		
<b>VI. MANAGEMENT</b>		
14. Grazing, Timber Har- vesting, and Agricul- tural Practices	Use only when necessary for proper manage- ment of wildlife, keeping in mind desira- bility of maintaining natural ecosystems.	Recognizes these activities are useful wildlife management tools. Would permit activities as long as they do not interfere with wildlife
15. Excessive Concentrations of Migratory Birds	Avoid them.	Full support
16. Designation of Wilder- ness Areas	Should designate suitable areas on refuges as wilderness.	Supports
17. Use of Pesticides and Animal Control	Generally inimical and should be last resort. Use should require special justification.	Agree in principle, but allow the intelligent use of these tools
18. Oil and Gas Exploration/ Mineral Extraction	Permission to extract oil and gas on refuges should be left to Congress; ban exploration and extraction of all minerals and steam.	Do not accept. Present safeguards adequate
19. Air and Water Quality	Should comply with federal, state and local laws/regulations on air and water quality and the management of lands.	Do not accept
20. Law Enforcement	Strengthen law enforcement efforts on refuges.	Unqualified concurrence
<b>VII. PUBLIC USE</b>		
21. Wildlife and Public Use	Refuges are for wildlife. Public use should never be detrimental to wildlife resources.	Reject philosophy expressed. Public use consistent with purpose of a refuge is encouraged.
22. Educational Activities	Strengthen environmental and natural resource education on refuges; require all persons using refuges to have had training in recreational safety and ethics.	Disagrees only with the training requirement
23. Public Awareness About Wildlife	Should be enhanced through improved relationship with media; more interpre- tive programs on refuges; more involve- ment in local communities.	Accept and endorse
24. Funds/Staff for Public Use	Funds, staff and facilities to allow public use of refuges should be increased.	Full support
25. Hunting, Fishing, Trapping on Refuges	Hunting should be permitted primarily to manage wildlife populations; prohibit commercial activities not necessary to manage fish and wildlife; limit trapping.	Qualified acceptance, but reject some of recommen- dation's implications
<b>VIII. RESEARCH</b>		
26. Research on Refuges	Need more research oriented to the needs of individual refuges.	Strong general support

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Table 2. Distribution of Task Force Report\*

Recipients	Distributing Office							Washington Office	Totals
	FWS Regions								
	1	2	3	4	5	6	7		
FWS Offices/Employees**	180	120	200	100	150	200			950
Public Requests	4	253	228	190	80	39	15	2919	3778
Conservation Groups			210				25	39	274
- National Wildlife Refuge Association	45	{80}			45	71	50	700	} 1273
- National Audubon Society	75			114	28	65			
- Ducks Unlimited	92			13		265			
- Sierra Club					13				
State Agencies			172	16	26	20			234
Media			20			20	6		46
Governors								50	50
Federal Agencies								8	8
Senators								39	39
Congressmen								95	95
Service Directorate								20	20
Totals	396	453	830	433	342	730	96	3870	7150

\* As reported by the Regional Offices and the Office of Public Affairs in Washington.

\*\* Field Stations, Regional Office Staff, Area Offices.

## Purpose

This paper:

- Summarizes the reactions and views of those individuals and organizations who commented on the Report as a result of the efforts by the FWS and others to solicit public input;
- Analyzes and interprets these comments to the extent possible; and
- Suggests some of the implications of this information on the proposed recommendations.

Consequently, it provides an important, new element for the Director and other Interior Department officials to consider as they establish the management philosophy and policies of the NWRS for the 1980's and 1990's.

## Approach and Methodology

The general procedure used to summarize and analyze the public comment on the Report is similar to Codinvolve, a system developed and employed with considerable success by the U. S. Forest Service.<sup>4/</sup> Such an approach is particularly useful in the analysis of large amounts of data, providing as it does quantitative summaries of the full range of public opinion and supporting statements (rationales) on any given issue. The procedural steps taken in the present analysis, which vary somewhat from the technical approach followed by the Forest Service, are described in Appendix B. Several limitations inherent in this type of analysis as well as specific difficulties encountered with this analysis are also discussed in Appendix B.

Overall responsibility for the analysis was assigned to the Assistant Director - Planning and Budget. Assistance was provided by the Division of National Wildlife Refuges and the Office of the Public Affairs. Members of the analysis team included two policy analysts and two summer interns from the Division of Program Plans, and two fish and wildlife administrators from the Division of Wildlife Refuges.

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4/ An in-depth discussion of the Codinvolve system and its role in the citizen participation process can be found in the Forest Service Inform and Involve Handbook, Forest Service, U. S. Department of Agriculture, August 1977 (DRAFT). A shorter description of the method is available in Clark, R. N. and Stankey, G. H., "Analyzing public input to resource decisions: criteria, principles and case examples of the Codinvolve system," Natural Resources Journal, 16, 1976, 213-236.

Through June 15, 1978, a total of 2,032 pieces of correspondence were received from the public in response to the Report and, to a much lesser extent, the question of the Task Force's membership. It became obvious after reviewing only a few responses that they generally fell into two categories--single-issue and comprehensive responses--and that such a dichotomy would prove useful in understanding and interpreting public comment on the report.<sup>5/</sup>

Of the total responses, 1,601 were classified as single-issue responses (i.e., more or less standard comments addressing one issue and primarily written in response to requests from interest groups or as a result of media accounts, rather than from the Task Force Report itself). Comprehensive responses (i.e., those which discussed specific recommendations in the Report and generally supplies supporting information and explained their reasoning in some detail) accounted for the remaining 431 responses. The latter responses were more likely to have been written by government officials, spokesmen for conservation groups and other private organizations and FWS employees. The more complete and in-depth responses from individuals were also included in this category.

The remainder of this chapter summarizes the reactions and comments received in terms of these two major categories of responses.

#### Comprehensive Responses

The 431 ~~comprehensive~~ responses from a variety of respondents are summarized in Table 3.

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<sup>5/</sup> Clark and Stankey, op cit., p. 216. The U. S. Forest Service research which led to the development of Codinvolve as well as their operational experience with that system recognizes a similar distinction among responses.

Table 3. Summary of Comprehensive Responses

General public (individuals and households)	204
Members of Congress	
- self	4
- for constituents	25
FWS employees	49
Non-governmental organizations	86
Government organizations	
- Federal	4
- state	55*
- local	2
<b>Total</b>	<b>431</b>

\* Responses were received from only 42 states and Guam. This larger number indicates that more than one agency or level within the state government commented for some states. In several instances, for example, both the governor and the fish and game agency commented.

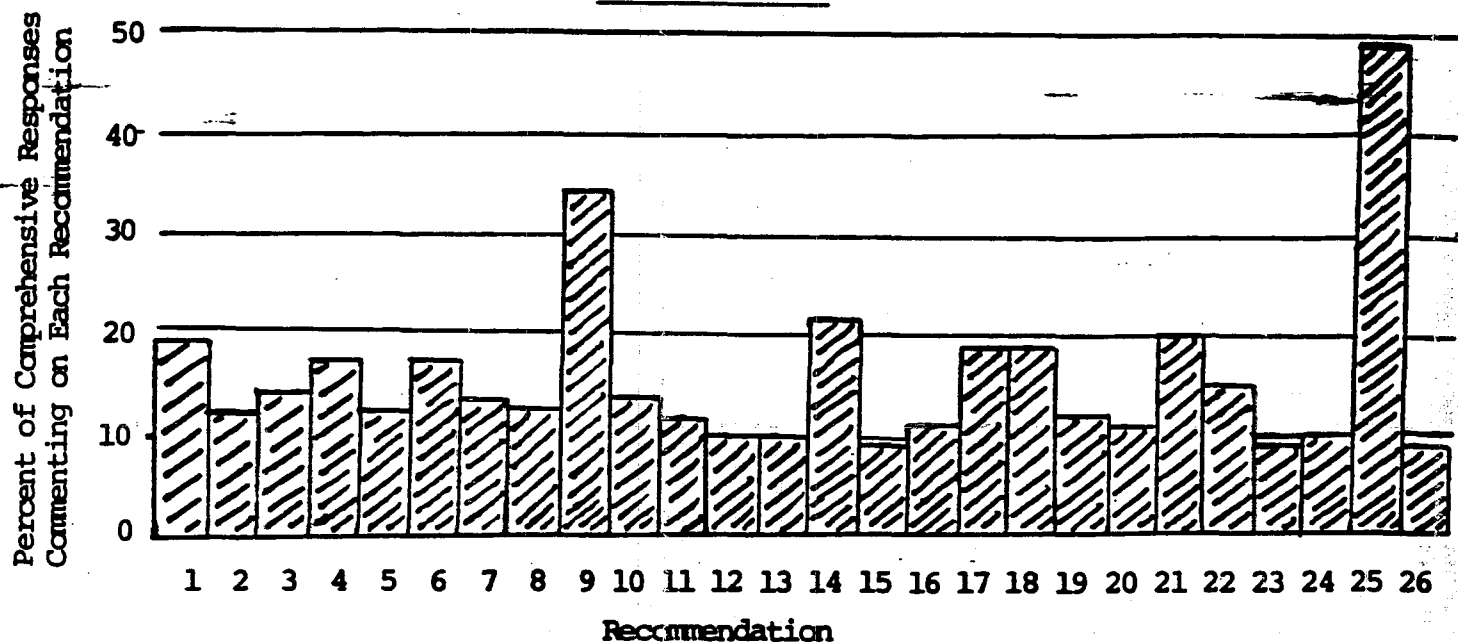
About nine percent of these responses (including all but one of the Congressmen writing for their constituents) addressed only the issue of the make up of the Task Force and were received before the report was made public on March 29. Most were in response to two AP wire stories last November or later editorial comments criticizing the lack of hunter representation on the Task Force. As a rule, the individuals who wrote these letters were upset that the Task Force did not include representatives of some longstanding sportsmen's groups. These responses are included in the totals because they are commenting on an aspect of the Report.

Many of the respondents expressed appreciation at the opportunity to comment on the Task Force Report and the Director's comments and recommendations.

About 65 percent of these responses, particularly those from the various institutions and organizations, either mentioned or alluded to the Task Force Report with the Director's comments as their source of information. Newspaper accounts were the source of information about the report for another five percent of these respondents. The source of information for about 21 percent of the respondents could not be ascertained. Reactions to the 26 recommendations contained in the 429 comprehensive responses are summarized in Table 4.<sup>6/</sup> Among those who submitted comprehensive responses, there was strong support for each of the Director's proposed recommendations, with the exception of Recommendation 9. In that instance, two-thirds of the respondents who addressed this recommendation disagreed with the Director.

<sup>6/</sup> When reviewing Table 4 (and Tables 5 through 8), it is important to keep in mind that all opinions are expressed as one of only four types of reactions. This, clearly, results in a simplification of reality in some instances and is necessitated by the desire to focus on the key reactions relevant to the decisions to be made.

Figure 1. Proportion of Comprehensive Responses Addressing Each Recommendation



As highlighted in Figure 1, relatively few respondents commented on all or even most recommendations. On the other hand, over 60 percent of the respondents expressed their views on the recommendations as a whole. Almost three-fourths of those who commented in this manner supported the Director's proposals.

Reactions of Organizations and Individuals. Tables 5 through 8 summarize the reactions of individual organizations grouped into several classes of respondents (states, Federal agencies, and non-governmental organizations) who submitted comprehensive responses. These reactions are highlighted — because, as a general rule, the respondents have greater knowledge about the management of national wildlife refuges. In addition, many of the organizations which commented have the staff capability to develop substantial, pertinent comments on the wide range of issues involved. In general, the states agreed with the Director's proposed recommendations while the general public and non-governmental organizations showed greater variability in terms of agreement and disagreement on specific recommendations.

#### STATE RESPONSES

As of the end of June, 55 individuals (including 21 governors) representing various levels of government in 42 states and Guam had commented on the Task Force Report (see Table 5). Most responses are from the fish and game divisions of the state departments of natural resources, independent fish and game commissions, or from the governors after consultation with state resource agencies.

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Table 4. Summary of Reactions to Recommendations From Comprehensive Responses

Recom- mendation	Respondents Commenting on Each Recommendation		Reaction (Percent of Respondents Commenting on Each Recommendation)			
	Number	Percent of Total Respondents	Agree with Director	Disagree with Director, Agree with T.F.	Disagree with both Director and T.F.	Comments but No Stance
1	78	18	87	8	4	1
2	57	13	77	14	2	7
3	64	15	69	22	2	8
4	71	17	72	14	7	7
5	57	13	72	11	7	11
6	78	18	69	15	1	14
7	60	14	68	20	5	7
8	54	13	85	9	2	4
9	151	35	30	62	3	5
10	62	14	74	13	6	6
11	53	12	92	4	4	0
12	41	10	88	12	0	0
13	44	10	84	9	5	2
14	93	22	61	33	1	4
15	40	9	75	8	5	13
16	48	11	79	6	6	8
17	82	19	68	28	1	2
18	80	19	65	24	9	3
19	53	12	79	19	0	2
20	46	11	91	4	4	0
21	87	20	72	24	0	3
22	65	15	80	11	3	6
23	39	9	90	8	0	2
24	41	10	80	7	7	6
25	212	49	68	12	17	3
26	37	9	92	7	0	1
Recommendations as a Whole*	267	62	72	20	8	--

\*This category reports respondents reactions to the recommendation in general. It is not a total of average of reactions to each of the 26 recommendations. In some instances, respondents reacted to the

About 40 percent of these state responses were exhaustive, addressing most, if not all, recommendations and comments. In most cases the states accepted the Task Force's recommendations, but usually concurred with the reservations and qualifications expressed by the Director. In many cases, these agencies expressed satisfaction upon examining the Director's comments, clarifications, and counterproposals.

Most responses included exhortations for increased Federal/state cooperation with respect to both overall planning for the National Wildlife Refuges in that state and to specific management decisions for a given refuge.

Responses to Task Force Recommendation 9 which address the organizational question were generally favorable to the Director's position. In some cases what is reported as agreement with the Director's proposed organizational arrangements may be more aptly termed as a noncommittal position for reasons of lack of familiarity with FWS organization or general reluctance to infringe on what is considered to be an internal FWS issue.

The states were almost unanimous in support of the Director's comments on hunting and trapping on refuges (Recommendation 25).

#### FEDERAL AGENCIES

The four Federal agencies commenting on the report are those which manage land themselves or interface on a continuing basis with the FWS although not necessarily concerning refuges (see Table 6). It is noteworthy that with the exception of BLM's discomfort with the broad scope of FWS acquisition envisioned in Recommendation 4, the Federal agencies concurred with the Director's proposed recommendations for each of those they commented on.

#### NATIONAL NON-GOVERNMENTAL ORGANIZATIONS

As might be expected, the 19 national non-governmental organizational responses (Table 7) generally reflected their particular interests or expertise for at least certain recommendations. Many commented on more than half of the recommendations--on the average these organizations commented on 14 of the 26 recommendations. While there are no discernible patterns to these responses, it would appear that the respondents agreed with the Director's position more often than they disagreed. However, several of the environmental organizations including Monitor, The Wild Canid Research Center, Defenders of Wildlife, and the Environmental Defense Fund urged that the Task Force recommendations be adopted in lieu of the Director's proposals. In addition, the predominant reaction to the question of organization (i.e., Recommendation 9) is support for the Task Force recommendation as opposed to the Director's.



The Wildlife Management Institute strongly urged that five steps, including making refuges a program, be taken to address the organizational problem.

#### REGIONAL/STATE/LOCAL NON-GOVERNMENTAL ORGANIZATIONS

Responses have been received from 66 organizations of less than national scope representing a wide variety of interests. The local chapters of the Audubon Society and sportsmen's and the trapper's associations were heavily represented. Responses also varied a great deal in terms of the opinions expressed on particular recommendations and the number of recommendations discussed. Reactions of these organizations to each of the recommendations are presented in Table 8.

Hunting on refuges (Recommendation 25) was commented on most frequently by these organizations. These reactions were along predictable lines based on the type of organization involved, e.g., hunting and trapping interests and the National Wildlife Federation affiliates generally concurred with the Director's position on Recommendation 25.

Audubon Society chapters, which accounted for nearly 30 percent of the the total responses in this group, were divided in their reactions to the Director's recommendations, however, they virtually all disagreed with the Director on Recommendation 9.

#### FWS EMPLOYEES

As far as we could ascertain, forty-nine present and retired FWS employees made their views known. Others who did not indicate an affiliation with the Service may inadvertently have been omitted from this listing.

Those Service personnel who commented generally supported the Director's recommendation with the exception of his position on the organizational question. Without a doubt, the issue most frequently addressed by Service employees was reorganization, particularly Recommendation 9b. By a margin of more than three to one, the 40 individuals who specifically commented on this issue favored the Task Force recommendation which, they believe will give greater visibility to the NWRS. Their comments and justifications in support of this position were varied and often lengthy, but focused primarily on the problems of:

- Funding;
- Sometimes conflicting policy and program direction from up to four programs; and
- Lack of emphasis on the needs of individual refuges.

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Public Reactions to Proposed Recommendations on the Management of NRES

Table 3. Reactions from States

State	Recommendations	General Approach	Recommendations as a Whole	Recommendations																								
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Alabama	Gov	F	A																									
Alaska	Gov/F&G	F	A																									
Arizona	DNR	F	A																									
Arkansas	Gov/F&G	U	A	A	A																							
California	F&G/RF&G	F	A	A	A																							
Colorado	DNR/F&G	F	A	A	A	A	D	A	A	D	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Connecticut	Gov	F	A	A	A																							
Delaware	Gov/R&S	F	A	A	A	A	A		D	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Florida	Gov/F&G	F	A	A	A																							
Georgia	DNR/F&G	F	A	A	A																							
Hawaii	Gov	F	A	A	A																							
Illinois	DNR	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Indiana	Gov	F	A	A	A																							
Iowa	GS/DNR	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Kansas	Gov/F&G	F	A	A	D	D	A	D	A	A	D	A	D	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Kentucky	Gov/F&G	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Louisiana	Gov/F&G	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Maine	Gov/F&G	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Maryland*																												
Michigan	DNR	F	A	A	A	A	A	A	A	A	C	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Minnesota	DNR	F	A	A	A																							
Mississippi	F&G	F	A	A	A																							
Montana	Gov	F	A	A	A																							
New Jersey	DNR	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
New Mexico	Gov	F	A	A	A																							
New York	GS/DNR	F	A	A	A																							
North Carolina	Gov/F&G	F	A	A	A																							
Ohio	DNR	F	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
Oklahoma	DNR	F	A	A	A																							
Oregon	Gov	F	A	A	A																							
Pennsylvania	F&G	F	A	A	A																							
Rhode Island	F&G	F	A	A	A																							
South Carolina	F&G	F	A	A	A																							
South Dakota	Gov	F	A	A	A																							
Tennessee	F&G	F	A	A	A																							
Texas	DNR	F	A	A	A																							
Utah	F&G/DNR	F	A	A	A																							
Vermont	F&G	F	A	A	A																							
Virginia	Gov	F	A	A	A																							
Washington	Gov	F	A	A	A																							
West Virginia	DNR	F	A	A	A																							
Wisconsin	Gov/DNR	F	A	A	A																							
Wyoming	F&G	F	A	A	A																							
Yukon	Gov	F	A	A	A																							

1/ Asterisk (\*) indicates State acknowledged receipt of report and indicated comments would be forthcoming, but none have been received.

2/ Respondent Abbreviations: Gov - Governor; GS - Governor's Staff; DNR - Department of Natural Resources or similar Departmental level organizational unit; F&G - Fish and Game Division or similar sub-Department level unit; DAGR - Department of Agriculture; RF&G - Regional fish and game unit.

U.S. Fish and Wildlife Service

Public Reactions to Proposed Recommendations on the Management of NMRS

Organization	General Approach	1/ Recommendation As a Whole	Recommendations 2/																									
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
Table 6. Reactions of Federal Agencies																												
Forest Service		A																										C
Bureau of Reclamation	F	A	A	C	A	A			A	A							C		A	A	A	A	A					A
Corps of Engineers	F																											
Bureau of Land Management	F	A	A	A		O	A	C	O											A								
Table 7. Reactions of National Nongovernmental Organizations																												
Wilderness Society	F	D	A	D		D	D	C	A		D		A			A		A	D	O	A		D	D	D	D	D	I
National Association of Conservation Districts		A	D	A		O	A	A	D	A	A	A	A		A	A		C	A	A	D	A	A	O	A		A	A
Wildlife Management Institute			A	A	D		C	C	A	O					A	A		A	A	A			A	C	A		A	A
Safari Club International	U		A	A	A	A	A	A	A	A		D	A	A	A	A	A	A	A	A		A	A	A	A	A	A	A
National Cattlemen's Association		A	A	A		D	C		O	C	A	D		C	A	A	A	A	A	A			A	A	A	A		C
National Wildlife Federation			A			A	A	A		D				A		A	A	A	A				A				A	A
American Forestry Association		A				D						A				A		O			D							A
Ducks Unlimited	U	A	A		A	A	A		A	A		A	O	A				A										A
American Bowhunter Committee	U																											A
Defenders of Wildlife		D									D					D			D				D	D				D
National Association for Humane Legislation	F		A	C	A	A	A	A	A	A	A	A	A	A	A	D	A	A	D	A	A	A	A	A	A	A	A	C
National Forest Products Assoc.																A												
Environmental Defense Fund												D																
Wild Canid Research Center											D					D			D	D		D						D
National Trappers Association																												A
Exxon																			A	A								
Atlantic Richfield Corporation	F			A			O												A									
Monitor		D						D								D			D									D
National Rifle Association		A	A	A	A	A	A	A	A	A	A	A	A	A	A	C	A	A	A	A	A	A	A	A	A	A	A	A

1/ Reaction to General Approach used by FWS to solicit comments: F-Favorable; U-Unfavorable.  
 2/ Reaction to Recommendations: A-Agree with Director; D-Disagree with Director, agree with Task Force; O-Disagree with both Director and Task Force; C-Comments, but no stance, pro or con, taken.

U.S. Fish and Wildlife Service

Public Reactions to Proposed Recommendations on the Management of the NMRS

Table 8. Reactions from Regional/State/Local Nongovernmental Organizations

Organization	General Approval	1/ Recommendations As a Whole	Recommendations 2/																									
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
<u>National Audubon Society Chapters</u>																												
Albany City	U	D									D																D	
Apalachee	F	A					A		A		D		A													A		A
Augusta	U	D				A					D																	
Birmingham	F	D									D									A	A		D	A				
Davis	F	A						D	A		D		A															
Decatur	F	A																									D	
El Dorado	F	D																					A					
Everglades	F	A																										
Fresno	F	A						A									A											A
Huachuca	U	D									D																	
Lycening	F	A									D									A				A				
Monterey	F	D																	D	D		D		D		A		D
Orondaga	F	D																	D	D								
Seattle	F	D																	D	D								
Willapa Hills	F	D																										
Takoma (Washington)	F	A																										
Felican Island																												
Clark County (Ohio)	F	D																										
<u>National Wildlife Federation Affiliates</u>																												
Alaska Wildlife Federation	F	A																										
Great Lakes Region	F	A																										
Montana Wildlife Federation																												
League of Ohio Sportsmen	F	A																										
Wisconsin Wildlife Federation	F	A																										
Chaves County Wildlife Federation, Inc.	F	A																										
Oklahoma Wildlife Federation	F	A																										
<u>Conservation Clubs</u>																												
N.Y. State Conservation Council, Inc.	F	A																										
Committee for Preservation of Tule Elk	F	D																										
Alaska Conservation Society	F	A																										
Michigan United Conservation Clubs	F	A																										
Muskegon United Conservation Clubs	U	A																										
Ohioans for Wildlife Conservation																												
Airboat-Halatruck & Conservation Club of Palm Beach City																												
<u>Sierra Club Chapters</u>																												
Denali	F	D																										
North Star	F	D																										
<u>Sportsmen's Organizations</u>																												
Brown City Sportsmen's Club	F	A																										

U. S. Fish and Wildlife Service  
Public Reactions to Proposed Recommendations on the Management of the NWRS

Table 8. Reactions from Regional/State/Local Nongovernmental Organizations (continued)

Organization	1/ General Approach	2/ Recommen- dations As a Whole	Recommendations 2/																									
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
<u>Sportsmen's Organizations (continued)</u>																												
Wisconsin Association of Sporting Dog Clubs	F	A		A	A																							A
Sportsmen's Alliance of Maine	F	A																										A
Northland Sportsmen's Club	F	A							A																			A
Marais Des Cygnes Valley Waterfowl Association	F	A																										
Michigan Duck Hunters Assoc.	U	A																										A
Trout Unlimited-Wisconsin Ch.	F	A																										A
Waterfowl Habitat Owners Alliance	F	A																A										A
Tanana Valley Sportsmen's Ass. Association (Alaska)	U	A					D												O					A	A			A
Migratory Waterfowl Hunters, Inc.		A									A																	A
Duck Hunters Association of Minnesota		A																										
Minnesota Waterfowl Association, Inc.		A																										
			A																									

Aside from Recommendation 9, the recommendations most frequently addressed concerned refuge management prerogatives, the use of pesticides, and the consumptive use of wildlife and products from refuges (Recommendations 6, 14, 17, 18, and 25). The full range of possible views were expressed about these issues. Some employees favored much tighter controls on consumptive uses and management techniques, while others favored giving refuge managers virtually a free hand in determining the need for and level of these activities. Most Service employees did not comment on many other recommendations. In those cases where they did, they generally agreed with the Director's proposals.

Some employees also made useful suggestions or raised pertinent issues not directly related to the recommendations. For example, updating or developing a new wildlife refuge manual and the possible need for a new or updated Refuge Programmatic EIS were suggested by several individuals.

Reasoning/Rationales Supporting Reactions. Respondents often provided comments in support of their position on each recommendation which, in the aggregate, are a diverse array of thoughtful and frequently perceptive comments and insights about the feasibility, desirability, and effectiveness of the recommendations. We have attempted to summarize below the most salient or frequently cited rationales and comments supporting the reactions of respondents for each recommendation.

Recommendation 25, which was also addressed in all 1,601 single-issue responses elicited the most polarized response of all the recommendations. Those who disagreed with both the Director and the Task Force on this recommendation would like to ban all hunting and trapping on wildlife refuges. They cited arguments similar to the ones posed by the FoA and DoW single-issue responses such as:

- animals should be free to roam;
- killing animals for sport is unnecessary; and
- refuges should really be places of sanctuary for all animals.

On the other hand, those who favored hunting and trapping on refuges supported the idea that hunting, fishing, and trapping are legitimate recreational activities. They further argued that:

- hunting is a necessary population check;
- hunters, fishermen, and trappers support refuges through special taxes; and
- banning hunting would go counter to the principle of multiple use.

A few others took a compromise view. They agreed that some hunting is needed for proper wildlife management, but urged that refuges not be managed to create a surplus simply to permit recreational hunting. Also, some people, although they considered hunting and fishing legitimate recreational activities, felt trapping is, at best, a borderline recreational activity.

The question of the organizational location of the NWRS in the FWS, Recommendation 9, had by far the largest percentage of responses which objected to the Director's proposed recommendation. Nearly two-thirds of those respondents commenting on this recommendation, including 34 of 38 FWS employees who commented, disagreed with the Director. The overwhelming majority of these individuals agreed with the Task Force. Their major rationales were:

- the program system is ineffective when it comes to managing refuges;
- funding of refuges is illogical and inadequate; and
- programs [and program objectives] should not override the importance of the refuge system.

Other than Recommendation 9, Recommendation 14 which deals with grazing and forestry activities on refuges had the most number of respondents disagreeing with the Director's proposed recommendation. Nearly a third of those who commented on this recommendation supported the Task Force position over the Director's stance. Most of those agreeing with the Task Force were from the general public or non-governmental organizations. Only four FWS employees and one state sided with the Task Force on this issue. Virtually all of the respondents agreed that these consumptive activities must at least be beneficial or neutral to wildlife, but many disagreed as to whether all of those activities which were neutral to wildlife actually belonged on a refuge.

Recommendation 21 which deals with public use on refuges elicited the fourth highest number of comments primarily because of the Task Force recommendation. About 72 percent of those addressing this issue felt that the Task Force recommendation was too strongly worded and were satisfied with the Director's proposed recommendation. Nonetheless, 24 percent of respondents who commented on this recommendation agreed with the Task Force. As one respondent stated:

"the public should not be locked out, but should come together with wildlife on wildlife's terms."

The distribution of comments about policies relating to the use of pesticides on refuges, i.e., those in response to Recommendation 17, is almost identical to the distribution of responses about Recommendation 14 related to grazing and forestry. About 58 percent agreed with the Director, while 28 percent supported the Task Force recommendation. All of the states and all but two FWS employees agreed with the Director on this recommendation. Most of the disagreement came from general public and non-governmental responses. They argued that pesticide use and animal control should be carried out cautiously, and only after all alternatives have been found infeasible. In addition, some who voiced no opposition to animal control, strongly objected to the use of pesticides.

Habitat manipulation as well as designation of additional wilderness areas on refuges appeared to be important to many respondents. Frequently, however, it was unclear whether individual respondents were agreeing or disagreeing with the Director's proposed recommendation. For instance, the majority of respondents agreed with the Director that naturalism is desirable, but that the needs of wildlife are sometimes better served by active manipulation.

While a large number of respondents commented on this question of oil, gas, and mineral extraction on refuges, relatively few indicated why they took one stance or the other. Ten respondents did indicate that consumptive uses including oil, gas and mineral extraction are acceptable as long as they do not interfere with wildlife or degrade habitat. The two national oil companies that commented agreed with the Director's assertion that present safeguards controlling the use of Federal oil, gas, and minerals were adequate. On the other hand, at least seven respondents believed that hard rock mining should be banned, while as many as 14 others felt that oil and gas exploration should also be banned.

Summarized below are the principal points raised about each of the other 19 recommendations. In general, the comments suggest there is little substantive concern about these recommendations. In many cases, it appears the points raised were due to some respondents reading more into the Director's comments than what is actually there, rather than to real disagreements with the substance of these recommendations. Such objections are mentioned below only if a number of people made similar misinterpretations.

Recommendation 1: Refuge System Mission - There was general acquiescence with the mission statement for the NWRS proposed by the Director. However, there appeared to be some confusion in the minds of a number of respondents over whether wildlife or people (i.e., society) is supposed to be the primary beneficiary of the NWRS. About a quarter of those who responded asserted that the needs of wildlife should come before those of society. In addition, at least six respondents objected to including the promotion of innovative technologies as an "equally important objective" of the NWRS.



Recommendation 2: Size of NWRS - Nearly four-fifths of those commenting on this recommendation agreed with the Director; however, there were a few individual objections. For example, one respondent argued that the recommendation was not strong enough on public involvement while another argued that land purchases should be oriented more toward protecting wildlife than providing recreational opportunities.

Recommendation 3: Additional Migratory Bird Refuges - There was general agreement with the Director although eight respondents cited the need for acquiring more breeding grounds, six cited the need for acquisition of more migratory habitat, and seven cited problems which will arise if more management responsibilities for migratory birds are delegated to the states.

Recommendation 4: Acquisition of Habitat for Other Wildlife - Most of the objections with this recommendation concerned the Director's broadening of the Task Force recommendation to include, as reasons for expansion of the NWRS, activities such as recreation that go beyond simply managing and protecting wildlife. At least 18 respondents commented that these other objectives could conflict with the more important objectives of the refuge system.

Recommendation 5: More Land Acquisition Funds - Price hikes for licenses and duck stamps drew conflicting comments. Novel taxes were proposed on land, consumer goods, recreational equipment, and similar items by several respondents.

Recommendation 7: Refuge Management Plans - Objections to this recommendation centered around the Director's comment that the "NWRS is not and should not be an end in itself." At least four respondents took this statement as an affront to the individual refuges, which they believed deserved some goals of their own. Eleven other respondents felt that the Director's proposed recommendation should emphasize accomplishing national goals as opposed to simply the goals of the U.S. Fish and Wildlife Service.

Recommendation 10: More Funds for Refuge Operations/User Fees - Respondents objected primarily to charging fees for noncommercial activities on refuges. Some FWS employees argued this would be more trouble than it is worth. Other respondents asserted that users already support refuges through taxes on sports equipment and the purchasing of duck stamps.

Recommendation 11: Public Participation - Respondents expressed concern that public participation might dominate professional judgment and that the national interest might not always prevail over local, possibly, short-sighted goals.

Recommendation 16 - The objections to Recommendation 6 were raised again. At least 14 respondents urged careful discretion in designating refuge lands as wilderness areas. Many argued that designating lands as wilderness areas would preclude active management needed to protect wildlife.

Recommendation 23: Public Awareness about Wildlife - Some respondents including seven FWS employees favored a substantial increase in educational and interpretive programs on refuges, especially near urban areas. In addition, these respondents felt that refuges could improve their visibility e.g., through more road signs, references in tour books, etc.

Recommendation 26 - A few respondents suggested directing more research toward the impact of consumptive activities on refuges and the ecosystems they encompass or are part of. They felt such research would be especially helpful in dealing with Recommendations 14 and 18.

There was no significant opposition to or comments about the Director's proposed Recommendations 8, 12, 13, 15, 19, 20, 22 and 24.

### Single-Issue Responses

The 1,601 single-issue or standard responses fall into four more or less distinct groups which are defined largely by the respondent's source of information about the report. The nature and magnitude of these responses are highlighted in Table 9.

We were able to identify the four single-issue responses with a high degree of accuracy.<sup>7/</sup> Criteria used to identify the four categories of single-issue responses are included in the instructions for completing the data collection form outlined in Appendix B. Also included are copies of the FoA and DoW alerts, examples of news articles and other published descriptions/discussions of the Report. All of these were instrumental in stimulating these single-issue responses.

Friends of Animals. The FoA responses focus on the issues of consumptive use of wildlife, i.e., hunting, on refuges (Recommendation 25). They all request that hunting and trapping be banned on wildlife refuges. In addition, these responses frequently referred to maintaining refuges as natural areas. While some of the responses consisted of only one sentence paraphrasing the FoA alert (e.g., "I demand that the 33.8 million acres of wildlife refuges be left as natural areas on which hunting and trapping are banned."), many others were longer and well

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<sup>7/</sup> By using the term "standard" to describe these responses, we are not implying that they are identical. Instead, responses were classified as standard if they appear to respond only to a secondary source and not the actual Task Force Report with the Director's comments and they did not go significantly beyond the arguments and issues raised in the secondary sources that stimulated the responses.

Table 9. Summary of Single-Issue Responses

Category of Responses <sup>1/</sup>	Type of Respondent					Totals <sup>3/</sup>
	Individ- uals	House- holds	Petitions <sup>2/</sup>	Non-govern- mental Or- ganizations	Congressmen Writing for Constituents	
Friends of Animals (FoA)	996	103	33 (427)	--	--	1,132 (56)
Defenders of Wildlife (DoW)	184	24	6 (32)	--	--	214 (11)
Other Non- hunters	62	7	-- (--)	--	1	70 (3)
Hunters	<u>174</u>	<u>5</u>	<u>3 (47)</u>	<u>2</u>	<u>1</u>	<u>185 (9)</u>
Totals	1,416	139	42 (506)	2	2	1,601 <sup>4/</sup> (79)

<sup>1/</sup> Defined primarily by respondent's source of information about the Report.

<sup>2/</sup> Numbers in parentheses indicate the number of individuals who signed these petitions.

<sup>3/</sup> Numbers in parentheses are percentages of the 2,032 responses received.

<sup>4/</sup> Total is through June 15, 1978. Through the date of this Report, the analysis team received an additional 162 single-issue responses. The breakdown is as follows: 66 FoA, 49 DoW, 7 Other Nonhunters, and 40 Hunters.

For responses identified as Friends of Animals and Defenders of Wildlife the specific source of information about the Report was known. These organizations each sent a special alert to their members, urging them to write either the Director of the "Wildlife Service" in the case of FoA or the Secretary of the Interior in the case of DoW concerning the recommendations of the Task Force. Generally, the specific source of information for the hunters and other nonhunters letters could not be identified although the source did not appear to be the Report itself.

About 13 percent of FoA respondents reiterated the claim in the FoA alert that "eight of the ten people on the Task Force represent pro-hunting organizations and arms manufacturers." Many respondents also objected to the quote attributed to the Director in the FoA alert that he has "no concern with the morality or acceptability of killing a fellow creature."<sup>8/</sup> Other FoA respondents quoted the dictionary definition of "refuge" and argued that it is hypocrisy to call these lands refuges if the wildlife on them can be hunted and trapped.

Defenders of Wildlife. The 214 responses for DoW members all request that the 26 Task Force recommendations be accepted as written. Basically, these responses reiterate the position outlined in a two-page Defenders of Wildlife alert, or an article in the June issue of Defenders magazine (see Appendix B). The alert presented facts on the levels of various activities allowed on refuges (haying, grazing, timber cutting, hunting, etc.) and requested that DoW members write the Secretary of the Interior, urging him to accept the Task Force's recommendations which would permit these activities only when they offer demonstrable benefits to wildlife.

Other Nonhunters. Seventy responses, which could not be identified as responding to either the FoA or DoW alerts seemed to be standardized. These responses were often too brief or too vague (outside of demonstrating a firm disapproval for hunting and trapping) to permit inferences about their source of information regarding the Task Force recommendations. It appeared, however, that they had not read the full report in most, if not all, instances. These respondents' strong opposition to hunting and trapping, especially on wildlife refuges, was clearly evident from their comments.

Hunters. Pro-hunting and trapping responses were defined as all responses which do not go significantly beyond:

- briefly opposing any limitations to hunting, fishing, or trapping on wildlife refuges; and
- complimenting the Director for opposing the Task Force concerning these additional limitations.

It appears that these individuals obtained their information about the report from accounts in outdoor columns of newspapers, outdoor magazines and general news articles. Virtually all such responses addressed only the hunting issue and clearly supported continued hunting on refuges, the Director's position on Recommendation 25. These respondents often expressed particular pleasure with the Director's comment that hunting, fishing, and trapping are "legitimate recreational activities" suggesting their attitudes towards hunting are not derived from concerns about the moral issues involved.

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<sup>8/</sup> The source of this quote is not known although it may reflect the way the FoA construed the Director's comments about Recommendation 25 (third paragraph on page 38 of the Report).

## DISCUSSION

### Recommendations Requiring Special Attention

As has been brought out previously, there appears to be substantial agreement with the Director's proposed recommendations, aside from the questions of hunting on refuges and organizing to manage the NWRS. This does not, however, mean the comments received suggest the Director's proposals can be adopted as presented. The reactions registered by respondents indicate there are at least two situations where a recommendation may require special attention from the Director before it is finalized:

- those instances where a significant difference of opinion exists about the substance of the recommendation; or
- those instances where concern arises due to differing interpretations of the intent of the recommendations rather than its substance (i.e., where only clarification is in order.)

As a general rule, the concerns related to the latter situation were with the Task Force recommendations and were clarified or alleviated by the Director's comments and proposed recommendations. Remarks by respondents often reiterated the Director's comments.

Identification of Controversial Issues. In general, controversial issues, i.e., recommendations, were those which:

- evoked comment by a significant proportion of respondents; and
- involved a substantial amount of disagreement with the recommendations, either the Director's or the Task Forces'.

Through our analysis we have identified three areas of controversy:

- hunting and trapping on refuges -- Recommendation 25;
- the organizational issue -- Recommendation 9; and
- the degree of naturalness in the management of refuges -- Recommendations 6, 14, 17 and 18.

The hunting issue was specifically addressed in all of the single issue responses and about half of the comprehensive responses. The organizational

issue, although not addressed in the single issue responses, elicited substantial disagreement with the Director from the comprehensive responses. The issue of naturalness was mentioned in at least all of the DoW single issue responses and over 20 percent of the comprehensive responses. No other issue drew as many objections to the Director's proposed recommendations as the ones mentioned above. Table 10 highlights the different reactions to these three issues, broken down into three respondent groups: individuals, non-governmental organizations, and governmental organizations.

Review of the comments and reasoning presented in the responses which deal with these controversial issues provides insight about the nature of the controversy/interest involved and some indications of how the differing points of view can be reconciled if this is possible at all.

Recommendation 25: Hunting and Trapping on Refuges. Approximately 90 percent of respondents commented on this recommendation. Individuals who disagreed with the Director's proposed recommendation, as well as those who oppose any hunting on refuges, outnumbered those who agreed with the Director by a margin of nearly seven to one. On the other hand, the organizations which commented on this question agreed with the Director by a four to one margin.

About 20 percent of those who submitted comprehensive responses indicated they felt:

- hunting, fishing and trapping are legitimate recreational activities;
- hunting and trapping are beneficial to wildlife populations since this prevents them from exceeding the carrying capacity of their habitat; and
- sportsmen have an inherent right to hunt on refuges since they paid for/support refuges with special taxes, the purchase of duck stamps, etc.

Several other reasons suggesting a steadfast attitude in support of hunting on refuges (e.g., hunting is an American heritage and other public use is not a primary purpose of refuges) were also cited, but less frequently. The attitude intensity of those who, in single-issue responses, supported continued hunting on refuges appears to be even stronger. This is not unexpected since the 10 percent of respondents who commented in this manner appeared to be motivated solely by the hunting question. The following quotes illustrate the attitudes of pro-hunting respondents:

- "... animals die in pain and misery far, far, far more from starvation and disease than they will from hunting and trapping.
- "... tax revenue from ... shell purchases and other sporting purchases etc., are clearly responsible for preserving what habitat is left in this country."

Part A -- Information about RespondentsCard Number  (1)Response Number  (3-6)

Period written:	Through 3/29 (7)	4/23 - 4/29 (11)	5/21 - 5/27 (15)
(or postmarked if no date on letter)	3/29 - 4/8 (8)	4/30 - 5/6 (12)	5/28 - 6/3 (16)
	4/9 - 4/15 (9)	5/7 - 5/13 (13)	6/4 & later (17)
	4/16 - 4/22 (10)	5/14 - 5/20 (14)	Unknown (18)

Respondent's: Sex - Male (19), Female (20), Both (21), Indeterminate (22)

Location - State  (23-24)

Type of Response: (Select one)

Individual  
General Public (27)

Legislator  
Self (28)  
Constituent (29)  
FWS Employee (30)  
Household (31)  
Petition (32)  
Institutional/Organizational  
Non-governmental (33)  
Governmental  
Federal (34)  
State (35)  
Local  (36)  
Other  (38-39)

Other  (40-41)

Source(s) of Information About Report:  
(Indicate all that apply)

Report with Director's Comments  
(yellow) (42)

Task Force Report Only (43)  
Newspaper Accounts (44)  
TV/Radio Accounts (45)  
Interest Group Action Alert  
DoW (47)  
Hunters (48)  
NWRA (49)  
FoA  (50)  
Other  (51-52)

Other  (53-54)  
Not identified  (55)

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Cited (56)  
Inferred (57)

Part B -- General/Procedural CommentsMakeup of Task Force: Agree (58) Disagree (59) Why?  (60-61)Should Have Included (Specific Organizations/Groups)  (62-63)

Approve (64) Disapprove (65) of Inclusion of Director's Comments/Recommendations

Insufficient Time to Comment (66)

Comments about Specific Refuges/FWS Activities (67)

Other Issues Raised (68)

Standard Responses:

DoW (69)  
Hunters (70)  
NWRA (71)  
FoA (72)  
Other  (74-75)

General Reaction to All Recommendations  
(Non-standard Responses)

Agree with Director (76)  
Disagree with Director,  
Agree with Task Force (77)  
Disagree with Both (78)

\*See instructions for definitions and procedures for completing this form.

## 76-78 Non-standard Responses:

Circle the appropriate reaction. If the respondent has no opinion about the recommendations as a whole, leave this section blank.

### Cards 2-8

For each recommendation a respondent addresses:

- 1) Always make sure you are marking the correct section for each recommendation, indicated by the large numbers in the right-hand margin.
- 2) Fill in the number of that recommendation in the box marked "Recommendation No."
- 3) Circle the number to the right of the phrase ("Agree with Director's proposed recommendation," etc.) which best describes the respondent's reaction to that recommendation.
- 4) If the respondent provides any rationales, comments, or alternatives, fill in the boxes with the corresponding code numbers indicated in the coding manual for that recommendation. You may enter up to 4 rationales or comments and 2 alternatives for each recommendation a respondent addresses. If the rationale, comment, or alternative is not in the coding manual, assign a 2 digit number to that item and enter it in the coding manual under that recommendation number.

Also, once you have finished coding a response be sure to make a check on the original response to indicate that it has been coded.



- 4) Request that their letter be included in the responses to Mr. Lynn Greenwalt

**B) Friends of Animals**

- 1) Addressed to: Director, Wildlife Service  
U.S. Department of the Interior  
18 and C Streets, N.W., Room 3255, . . .
- 2) Use phrase "eight of the ten people represent pro-hunting organizations and arms manufacturers."
- 3) Use phrase "demand that the 33.8 million acres of Wildlife Refuge be left as natural areas on which hunting and trapping are banned."
- 4) Mention the Director's having said that he has "no concern with the morality or acceptability of killing a fellow creature."
- 5) Mention that picking wildflowers is illegal on public land, and consequently killing animals on public lands, should also be illegal.

58-68 Circle any items that apply. See the coding manual for the appropriate codes for items 60-61 and 62-63. Leave blank if issues or points raised not addressed in the response.

**69-75 Standard Responses:**

- A) Defenders of Wildlife - Any response which does not go significantly beyond the arguments and issues raised in the action alert or editorials in Defenders' Magazine written by John Grandy, Executive Vice President of Defenders of Wildlife. A copy of the action alert follows.
- B) Friends of Animals - Any response which does not go significantly beyond the arguments and issues raised in the newsletter written by Alice Herrington, President of Friends of Animals. A copy of the letter follows.
- C) Hunters - Any response which does not go significantly beyond (1) briefly opposing any limitations to hunting, fishing, or trapping on wildlife refuges and (2) complimenting the Director for opposing the Task Force concerning these additional limitations. Many of these responses are the result of an Associated Press news report written by James Phillips.

All responses which go significantly beyond a restatement of these arguments should be considered non-standard responses.

## Instructions for Coding Responses and Sample Coding Form

### General Instructions:

Circle the appropriate field numbers (the ones in parentheses) and fill in the boxes when necessary. For additional directions see the coding manual and instructions which follow.

### ITEM

#### Card 1

3-6 Fill in the 4-digit response number. Put zeros in blank spaces.

7-18 Circle the number next to the appropriate time period.

19-22 Circle one item.

27-41 Select one category which best describes the type of response. Note: (1) For members or leaders of organizations and institutions, if they are giving their personal opinions (e.g., use "I" or "My opinion that"). Consider the responses as coming from individuals. (2) When the category "other" applies, fill in the boxes with the corresponding code number indicated in the coding manual.

42-57 Circle one or more categories from items 42-54 and either "cited" or "inferred." If the source is not identified, circle only item 55. Letters stemming from the Defenders of Wildlife (DoW) and Friends of Animals (FoA) newsletters can be identified as follows:

#### A) Defenders of Wildlife

- 1) Addressed to: "The Honorable Cecil D. Andrus, Secretary of the Interior, . . ."
- 2) Use phrase "urge that the recommendations of the National Wildlife Refuge Study Task Force be accepted by the Department"
- 3) Use phrase "oppose continued grazing, haying, timbering, pesticide use, predator control, hunting, and trapping or refuge lands unless such activities offer demonstrable benefits for wildlife"

The entire set of 2,032 public comments was transferred from the data collection forms to punch cards for automatic data processing. To minimize the amount of error introduced in the preparation of the data, keypunching was verified by a second operator. The estimated error attributable to keypunching was less than one percent. A system of computer programs, the Statistical Package for the Social Sciences (SPSS)<sup>4/</sup> was used to tabulate the data.

#### Limitations:

It seems useful to underscore several aspects of the analysis which, in combination, suggest caution should be exercised in the interpretation of the results. These limitations can be discussed under two general headings: (1) the nature of public response, and (2) basic problems in content analysis.

The Nature of Public Comment. It is generally recognized that people who write letters to public officials are frequently not representative of a cross-section of the American public. Hence, the total number of comments for or against a proposed recommendation may be somewhat misleading in the absence of corroborating data obtained from other sources. Sheer volume may be indicative only of the success of an organized letter-writing campaign.

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<sup>4/</sup> See Nie, N. H. et al. SPSS: Statistical Package for the Social Sciences. New York: McGraw-Hill, 1970.

- sex of respondent (if it could be determined);
- location of respondent by state;
- type of response (e.g., several categories of individuals, institutions, households, and petitions);
- whether it was a single-issue response;
- source of information about the report;
- general/procedural comments about the report; and
- reactions to each recommendation, rationales for stated opinions, and alternative policies suggested.

Each individual set of comments was coded on the data collection form by a member of the analysis team. To insure that intercoder reliability (i.e., the degree to which two team members would agree that an item of information should be coded one way as opposed to another) was sufficiently high, a consistency check was performed on a sample of comments coded independently by each of two pairs of analysts.

Reliability was well within acceptable limits ( $\geq .85$ ) for the bulk of the material. While agreement was not as high initially on the content categories developed for the supporting statements (rationales) for individual recommendations, the reliability improved considerably when similar content categories were collapsed under fewer generic rationales.

respondents were commenting on, and whether respondents were agreeing with the Director's proposals or the Task Force's recommendations (in some instances they disagreed with both sets of recommendations).

However, the published literature on Codinvolve suggests that, historically, the circumstances when the technique has been used by the U.S. Forest Service seldom rivaled the Refuge Task Force Report in terms of the complexity of the subject matter. Nonetheless, we feel that much information has been developed which will be useful in making decisions about the proposed recommendations.

Finally, this analysis represents a pioneering effort to go beyond a cursory review of public comment. Since the Fish and Wildlife Service does not yet have the wealth of public involvement experience that is evident in the work of the U. S. Forest Service, this analysis has, of necessity, been a learning experience.

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Attached are the following:

- a copy of the instructions for coding responses
- a sample coding form
- the Friends of Animals organizational alert
- the Defenders of Wildlife organizational alert
- the June 1978 Defenders magazine article concerning the Refuge Study Task Force Report
- James Phillips's Associated Press report concerning the Refuge Study Task Force Report
- the National Wildlife Refuge Association organizational alert.

Clearly, the individuals who commented on the Report are not representative of the general population; hence, some caution should be exercised in interpreting the results.<sup>5/</sup> Moreover, rather than reacting to the Report itself, comments often were based on information derived from secondary sources--"action alerts" or brief newspaper articles which focus on limited aspects of the Report. Frequently slanted or biased, such accounts effectively filter the information available to the public.

Basic Problems in Content Analysis. Although Codinvolve or similar analytic systems are almost mandatory in the handling of large amounts of public comment, the richness of the data and the insights of so many thoughtful individuals cannot be totally reduced to mere frequency tables and summaries of comments. Further, unlike attitude surveys, where the content of responses is largely predetermined and controlled by the researcher, analysis of communication content is highly dependent on whatever the writer chooses to provide in terms of information and how it is structured.

In the present study, the nature of some of the issues also made analysis difficult. Coders occasionally had trouble sorting out what the

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<sup>5/</sup> This observation should not, however, be taken as an indictment of the data base used in the analysis. Some observers argue that, for public involvement efforts, the only requirement is to assure that everyone has the opportunity to comment. Thus, it may be neither necessary nor very practical to seek the views of a cross-section of the entire population. See Behan, R. W. Why the Majority is Silent (manuscript).

## Responsibilities

Overall responsibility for the analysis was assigned to the Assistant Director - Planning and Budget with the assistance of the Division of Wildlife Refuges and the Office of Public Affairs. Members of the analysis team included two policy analysts and two summer interns from the Division of Program Plans, and two fish and wildlife administrators from the Division of Wildlife Refuges.

## Procedure

All correspondence pertaining to the Task Force Report was initially screened and acknowledged by the Office of Public Affairs. The original responses were then forwarded to the analysis team. By the end of the third week of the comment period a sufficient amount of mail had accumulated to permit the development of a basic data collection form and the development of content categories for the analysis. Several variations of the data collection form were designed, tested and redesigned before the data was tabulated. The final version of the data form, a copy of which is presented in this appendix, included the following data elements:

- an assigned number for each response;<sup>3/</sup>
- week when response was prepared:

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<sup>3/</sup> It should be understood that no attempt was made, nor was there ever any intention to identify individuals commenting on the report or proposed recommendations. On the other hand, institutions commenting and a summary of their comments have been included in this report.

Public Reactions to Proposed Recommendations on the Management of the NWRS

Appendix B: Approach and Methodology

Analytic Model

The general procedure used to analyze the public comment on the Refuge Task Force Report is similar to Codinvolve, a system the U.S. Forest Service developed and employed with considerable success.<sup>1/</sup>

Simply stated, Codinvolve is a flexible method of content analysis which facilitates the coding, storing, retrieving, summarizing and displaying of citizen responses to important issues.<sup>2/</sup> It is particularly useful in the analysis of large amounts of data, providing as it does quantitative summaries of the full range of public opinion and supporting statements (rationales) on any given issue. Although, the procedural steps taken in the present analysis vary somewhat from the technical approach followed by the Forest Service, the Coordinator of the Inform and Involve Program, U.S. Forest Service, reviewed and endorsed the FWS plan for data analysis in a meeting with Fish and Wildlife project team members on June 2, 1978.

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<sup>1/</sup> An in-depth discussion of the Codinvolve system and its role in the citizen participation process can be found in the Forest Service Inform and Involve Handbook, Forest Service, U.S. Department of Agriculture, August 1977 (DRAFT). A shorter description of the method is available in Clark, R. N. and Stankey, G. H., "Analyzing public input to resource decisions: criteria, principles and case examples of the Codinvolve system," Natural Resources Journal, 16, 1976, 213-236.

<sup>2/</sup> Content analysis is simply the tabulation of the things that are said.



A substantial majority of the single-issue responses appear to be from individuals who exhibit what Kellert describes as strong "moralistic" and "humanistic" orientations toward wildlife. The former is characterized by "concern about the ethical treatment of animals, with strong opposition to exploitation and cruelty;" the latter is marked by "interest and affection for individual animals, principally pets." In contrast, the remaining single issue responses, i.e., those considered staunchly pro-hunting and trapping, suggest a highly "utilitarian" attitude: "concern with the practical and material value of animals."<sup>8/</sup>

Unfortunately, these responses also indicate that attitudes toward wildlife management are highly polarized, particularly where hunting and trapping are at issue. For example, a recent national study by the Department of Agriculture found that the U. S. public is closely divided on the issue of hunting. Although slightly more people approve rather than disapprove of legal hunting, two other findings are more illuminating:

1. Very few respondents used a "don't know" option, suggesting that strength of feeling on the issue was high; and
2. Attitude intensity was found to be high among both groups, but particularly so among anti-hunting respondents.<sup>9/</sup>

If nothing else, the large number of single-issue responses suggests that we need to be aware of and understand the positions advocated by these highly polarized groups, and to seek wherever possible new means of gaining their understanding and support. Protection of habitat appears to be one potential area of common concern. Kellert's identification of a possible increase among Americans in an "ecologistic" attitude--"interest in the environment as an interrelated system, with emphasis on wildlife species and natural habitats in relationship to this system"--holds out additional hope for an eventual resolution of differences. <sup>10/</sup>

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<sup>8/</sup> Kellert, S. R. Policy Implications of a National Study of American Attitudes and Behavioral Relations to Animals. A final report to the Fish and Wildlife Service, June 1977.

<sup>9/</sup> Arthur, op cit., p.2.

<sup>10/</sup> Kellert, op cit., p.4.

"We currently have an awkward and inefficient method of managing a land base by Program Management as it is now designed. We are continually wrought with frustration in attempting to manage this land base by separate programs, the goals and directions of which are in frequent conflict. We find ourselves in a constant argument with the various Program Managers/Coordinators about who will fund the overhead expenses including the maintenance of access roads, administrative buildings and all other operations required on a refuge which do not directly produce more ducks, more endangered species or mammals or non-migratory birds, and etc."

Recommendations 6, 14, 17, and 18: Degree of Manipulation of Refuge Environments. Although treated separately in the Task Force Report, Recommendations 6, 14, 17, and 18 all deal with the same basic issue-- the degree of naturalness in the management of wildlife refuges. This commonality may largely explain the strong similarity in the number of comprehensive responses which addressed this issue with their reactions to Recommendations 14, 17, and 18 (see Table 4).

DoW single-issue responses dealt specifically with Recommendations 14, 17, and 18. When viewed in the context of apparent substantial interest in the naturalness of refuges, the reference to maintaining refuges as natural areas in the FoA alert and in many of the FoA single-issue responses that resulted may, in fact, represent a real interest in Recommendation 6 and may also be commenting on Recommendations 14, 17, and 18.

Among those organizations and individuals who submitted the comprehensive responses, about a third, generally the environmentalists and those against hunting on refuges, opposed the Director's proposed modifications of the Task Force recommendations on these issues. That change will allow continued manipulations of refuge environments. On the other hand, the State responses which were generally developed by or under the influence of the State wildlife agencies strongly endorsed the Director's stance on these recommendations.

#### The Significance of Single-Issue Responses

In terms of sheer numbers, the single-issue comments from the public far surpassed those classified as comprehensive responses. Four out of every five letters commenting on the Task Force Report were of this variety.

The Refuge Task Force Report seemed to elicit single-issue responses on those recommendations which dealt with the consumptive use of wildlife and products (e.g. grazing, mineral extraction, and logging) and the manipulation of natural habitat, including predator control and pesticide use..

U.S. Fish and Wildlife Service

Public Reactions to Proposed Recommendations on the Management of the NWRS

Table 11. Reactions to Proposed Organizational Changes (Recommendation 9) by Respondent Groups

Respondent Group	Respondents in Group	Percent of Group Commenting	Reaction of Respondents to Recommendations (percent of those commenting)			
			Agree with Director	Disagree with D, Agree with T.F.	Disagree with Both	Comments But No Stance
States	42	57	83	13	--	4
Federal Agencies	4	--	--	--	--	--
Nongovernmental Organizations	86	38	21	64	3	12
FWS Employees	51	78	15	85	--	--
Individuals/other	239	23	25	65	5	5
All Respondents	431	35	30	62	3	5

Recommendation 9: Organizational Arrangements for Management of the NWRS. This question is not addressed at all by the single-issue responses. Summarized in Table 11 are the reactions to this recommendation from the several categories of respondents who provided the comprehensive comments on the Report. As can be seen from the table, a large majority of FWS employees, non-governmental organizations, and individuals disagree with the Director on this issue. All the Federal agencies deferred to the FWS on this question.

Virtually all of the states commenting on this question supported the Director's position; however, those states which concurred with the Director's recommendation did not discuss any reasons for their stance.

Non-governmental organizations and individuals cited a wide range of reasons for preferring the Task Force's organizational proposals over the Director's, but only one was cited by more than 10 percent of these respondents:

Refuges need a single boss, a single person who will be responsible for the System.

In addition, one individual asked:

How can there be a National Wildlife Refuge System if it is managed on a regional basis?

FWS employees who commented preferred, by the largest margin of any group of respondents, the Task Force's organizational recommendations over those proposed by the Director. The following quotes are indicative of the problems with the present organizational arrangements cited by Service employees who did comment on this recommendation:

"Under the present system a few basic axioms of management seem to be forgotten as far as refuges are concerned. These are (1) money equates to material and manpower, and (2) everyone must be accountable to only one supervisor.

"These basic concepts are violated by the fact that the individual refuges' source of funds comes from two, three, four or even five different programs. This is further complicated by the fact that many times a single action on the refuge impacts three or four present programs. The end result is that the refuge manager must run his refuge, but he is forced to lie and cheat so that some Program Manager's books balance!

". . . there is no store manager in the Nation that could stay in business if he had to operate his store under the funding and dictates of a higher authority meat program, vegetable program, etc., all telling him how to run his store. Yet, this is the situation the Refuge Manager finds himself strapped with.

About a third of the comprehensive responses which addressed Recommendation 25 indicated that all hunting and trapping on refuges should be banned. In the view of these respondents, such activities are inhumane. They argued that the Refuge System should be a sanctuary for all animals. In addition, while most of the comments submitted in response to the DoW Alert urge that all Task Force recommendations be adopted, it is clear that one of the principal concerns of these respondents was with Recommendation 25, the issue of hunting on refuges. Some examples of such comments are the following:

"... It is my fervent wish that the Wildlife Refuge land areas be declared off limits to hunting and trapping. I do not wish to have my tax money supporting killing of animals on these lands.

"... Are we going to bulldoze, trample, and befoul and kill everything on this small sphere until nothing is left but garbage? If we don't soon give Nature a hand, nature is going to turn on us and doom us all.

"... The logic of saying killing is alright because all things must die is faulty at best. That could justify murder too."

In light of the strong opposition to hunting on refuges, it is likely that if current policies on hunting are largely unchanged (i.e., Director's proposals concerning Recommendation 25 are accepted by the Department) the Service can expect a continuation of current case-by-case challenges to refuge hunting programs in the Federal courts. As we perceive the reactions to the question of hunting on refuges, there does not appear to be a great deal of hope for reconciliation of the deeply held, essentially diametrically opposed views about this issue.

It cannot be emphasized too strongly, however, that despite the strong differences of opinion on this issue, the many thoughtful comments submitted by concerned citizens will be very helpful in the formulation of the final recommendations.

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Table 10. Reactions of Individuals and Organizations to the Three Major Concerns of Respondents.

Respondent Groups	Areas of Concern/Reactions														
	Hunting (Recommendation 25)					Organization (Recommendation 9)					Degree of Manipulation of Refuges (Recommendations 17/14)*				
	Agree with Dir.	Disagree with D., Agree with T.F.	Disagree with Both	Comments Only	Totals	Agree with Dir.	Disagree with D., Agree with T.F.	Disagree with Both	Comments Only	Totals	Agree with Dir.	Disagree with D., Agree with T.F.	Disagree with Both	Comments Only	Totals
Individuals	260	227	1,236	2	1,725	20	71	3	2	96	21/26	226/235	1/1	1/1	249/263
Nongovernmental Organizations	37	12	1	3	53	7	21	1	4	33	15/13	11/9	0/0	1/2	27/24
Governmental Organizations	34	0	1	1	36	19	2	0	1	22	20/18	0/1	0/0	0/1	20/20

\* The concern over the degree of manipulation (or naturalness) of refuge environments also involves Recommendations 6 and 18. Since these responses cannot be added together and these two recommendations are indicative of the extent and nature of the reactions to this area of concern, it is sufficient to include information for only these two recommendations in this Table.

Part C - Comments About Individual RecommendationsCard Number 2 (1) Response number      (7-6)Recommendation No.      (7-8)

## Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments      (13-14)      (15-16)      (17-18)      (19-20)Alternative Policy(ies) Proposed      (21-22)      (23-24)Recommendation No.      (25-26)

## Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments      (31-32)      (33-34)      (35-36)      (37-38)Alternative Policy(ies) Proposed      (39-40)      (41-42)Recommendation No.      (43-44)

## Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments      (49-50)      (51-52)      (53-54)      (55-56)Alternative Policy(ies) Proposed      (57-58)      (59-60)Recommendation No.      (61-62)

## Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments      (67-68)      (69-70)      (71-72)      (73-74)Alternative Policy(ies) Proposed      (75-76)      (77-78)

Part C - Comments About Individual RecommendationsCard Number **3** (1) Response number  (3-6)Recommendation No.  (7-8)

## Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments  (13-14)  (15-16)  (17-18)  (19-20)Alternative Policy(ies) Proposed  (21-22)  (23-24)Recommendation No.  (25-26)

## Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments  (31-32)  (33-34)  (35-36)  (37-38)Alternative Policy(ies) Proposed  (39-40)  (41-42)Recommendation No.  (43-44)

## Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments  (49-50)  (51-52)  (53-54)  (55-56)Alternative Policy(ies) Proposed  (57-58)  (59-60)Recommendation No.  (61-62)

## Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments  (67-68)  (69-70)  (71-72)  (73-74)Alternative Policy(ies) Proposed  (75-76)  (77-78)



## Part C - Comments About Individual Recommendations

Card Number 4<sup>th</sup> (1) Response number                     (7-6)Recommendation No.           (7-3)

## Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments           (13-14)           (15-16)           (17-18)           (19-20)Alternative Policy(ies) Proposed           (21-22)           (23-24)Recommendation No.           (25-26)

## Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments           (31-32)           (33-34)           (35-36)           (37-38)Alternative Policy(ies) Proposed           (39-40)           (41-42)Recommendation No.           (43-44)

## Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments           (49-50)           (51-52)           (53-54)           (55-56)Alternative Policy(ies) Proposed           (57-58)           (59-60)Recommendation No.           (61-62)

## Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments           (67-68)           (69-70)           (71-72)           (73-74)Alternative Policy(ies) Proposed           (75-76)           (77-78)

## Part C - Comments About Individual Recommendations

Card Number 5 (1) Response number      (7-6)Recommendation No.      (7-3)

## Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments      (13-14)      (15-16)      (17-18)      (19-20)Alternative Policy(ies) Proposed      (21-22)      (23-24)Recommendation No.      (25-26)

## Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments      (31-32)      (33-34)      (35-36)      (37-38)Alternative Policy(ies) Proposed      (39-40)      (41-42)Recommendation No.      (43-44)

## Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments      (49-50)      (51-52)      (53-54)      (55-56)Alternative Policy(ies) Proposed      (57-58)      (59-60)Recommendation No.      (61-62)

## Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments      (67-68)      (69-70)      (71-72)      (73-74)Alternative Policy(ies) Proposed      (75-76)      (77-78)

\*See instructions for definitions and procedures for completing this form.

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Prepared by \_\_\_\_\_

Part C - Comments About Individual RecommendationsCard Number 6 (1) Response number      (7-6)Recommendation No.      (7-3)

## Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments      (13-14)      (15-16)      (17-18)      (19-20)Alternative Policy(ies) Proposed      (21-22)      (23-24)Recommendation No.      (25-26)

## Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments      (31-32)      (33-34)      (35-36)      (37-38)Alternative Policy(ies) Proposed      (39-40)      (41-42)Recommendation No.      (43-44)

## Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments      (49-50)      (51-52)      (53-54)      (55-56)Alternative Policy(ies) Proposed      (57-58)      (59-60)Recommendation No.      (61-62)

## Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments      (67-68)      (69-70)      (71-72)      (73-74)Alternative Policy(ies) Proposed      (75-76)      (77-78)

\*See instructions for definitions and procedures for completing this form.

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Prepared by \_\_\_\_\_

Part C - Comments About Individual Recommendations

Card Number 7 (1) Response number    (3-6)

Recommendation No.   (7-8)

Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments   (13-14)   (15-16)   (17-18)   (19-20)

Alternative Policy(ies) Proposed   (21-22)   (23-24)

Recommendation No.   (25-26)

Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments   (31-32)   (33-34)   (35-36)   (37-38)

Alternative Policy(ies) Proposed   (39-40)   (41-42)

Recommendation No.   (43-44)

Reaction:

Agree with Director's proposed recommendation (45)

Disagree with Director, agree with Task Force recommendation (46)

Disagree with both Director and Task Force recommendations (47)

Comments, but no stance (48)

Rationale(s)/Comments   (49-50)   (51-52)   (53-54)   (55-56)

Alternative Policy(ies) Proposed   (57-58)   (59-60)

Recommendation No.   (61-62)

Reaction:

Agree with Director's proposed recommendation (63)

Disagree with Director, agree with Task Force recommendation (64)

Disagree with both Director's and Task Force recommendations (65)

Comments, but no stance (66)

Rationale(s)/Comments   (67-68)   (69-70)   (71-72)   (73-74)

Alternative Policy(ies) Proposed   (75-76)   (77-78)

\*See instructions for definitions and procedures for completing this form.

June 1978

U.S. Fish and Wildlife Service  
RESPONSES TO REFUGE REPORTS

Page 8-8

Prepared by \_\_\_\_\_

Part C - Comments About Individual Recommendations

Card Number 8 (1) Response number      (6)

Recommendation No.      (7-8)

Reaction:

Agree with Director's proposed recommendation (9)

Disagree with Director, agree with Task Force recommendation (10)

Disagree with both Director and Task Force recommendations (11)

Comments, but no stance (12)

Rationale(s)/Comments      (13-14)      (15-16)      (17-18)      (19-20)

Alternative Policy(ies) Proposed      (21-22)      (23-24)

Recommendation No.      (25-26)

Reaction:

Agree with Director's proposed recommendation (27)

Disagree with Director, agree with Task Force recommendation (28)

Disagree with both Director and Task Force recommendations (29)

Comments, but no stance (30)

Rationale(s)/Comments      (31-32)      (33-34)      (35-36)      (37-38)

Alternative Policy(ies) Proposed      (39-40)      (41-42)

25

26

April 1978

U R G E N T

NO REFUGE FOR HUNTERS AND TRAPPERS

Ten people were appointed by the federal bureaucracy to form a "Task Force" to make recommendations for "the future of the National Wildlife Refuge System." Eight of the ten people represent pro-hunting organizations and arms manufacturers. They recommend that hunting and trapping on these public lands be continued.

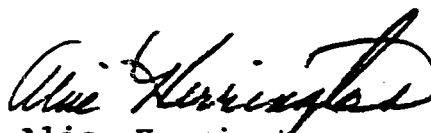
The Director of the U.S. Wildlife Service (whose salary you pay) has assured the Task Force that he has "no concern with the morality or acceptability of killing a fellow creature." Why? Because in time they all must die and thus they might as well be "harvested" for "recreation." And he proposes to increase opportunity for hunters and trappers on Wildlife Refuges.

- If you pick a wildflower or cut a tree on public land  
- you may be arrested - and rightly so. How then can the government permit other people to harrass, injure, and kill sentient animals on that same public land - your land? How can such cruelty continue when the courts have held that under the law all wild birds and all wild animals belong to you?

Please write a letter demanding that the 33.8 million acres of Wildlife Refuge be left as natural areas on which hunting and trapping are banned. Address your letter to:

The Director, Wildlife Service  
U.S. Department of the Interior  
18th and C Streets, N.W., Room 3255  
Washington, D.C. 20240

Be sure to send a copy of your letter to me. We'll work together to end the war on wildlife.

  
Alice Herrington  
President

over...

Appendix B

DIRECTORS: Arnold Bernhard, Tom Bywaters, Regina Frankenberg, Alice Herrington,  
Jacques Lindon, Harrison D. Maas, Stephen Rivkin, J. Stanley Sharp

# Defenders OF WILDLIFE

May 3, 1978

## ACTION ALERT:

Dear Active Members:

The survival of wildlife refuges is at stake. Please help now if you want these areas to be safe places for wildlife.

### Background

Last fall, I was invited to serve on a citizens' advisory board called the National Wildlife Refuge Study Task Force. Our mission was to study refuges and make recommendations designed to chart the course of refuge policy for the next decade.

### Issues

The Task Force defined refuges as places devoted to the protection, enhancement and well being of wildlife and wildlife habitat. The group called for substantial reforms of policies on grazing, timber harvesting, agriculture, pesticide use, predator control, hunting, and trapping on refuge lands. For example, in 1974 (the most recent figures available) the government allowed 800,000 pounds of pesticides to be spread on refuges. Hunting, trapping, and other taking resulted in the killing of over 787,000 animals from these lands--supposedly safe places for wildlife. The Task Force found that refuges are not immune from a multiple of abuses, and that nothing was being done about the problems (see back).

### Government Response

Upon receiving the Task Force report, Lynn A. Greenwalt, Director of the U.S. Fish and Wildlife Service, constructed a lengthy response. The Director accepted all the general and noncontroversial suggestions but defensively opposed changes aimed at eliminating the abuses of pesticide use, hunting, trapping, etc.

### Action

**\*\*Write the Secretary of the Interior:** The Honorable Cecil D. Andrus  
Secretary of the Interior  
Department of the Interior  
Washington, D.C. 20240

and express your concern for wildlife refuges.

**\*\*Urge that the recommendations of the National Wildlife Refuge Study Task Force be accepted by the Department.**

**\*\*Oppose continued grazing, haying, timbering, pesticide use, predator control, hunting, and trapping on refuge lands unless such activities offer demonstrable benefits to wildlife.**

**\*\*Write before May 15, if possible; later if necessary.**

Please help. The future of wildlife refuges is at stake.

Thank you for all your good work,

John W. Grandy  
Executive Vice President

NOTE: Ask that your letter be included in the responses to Mr.

Appendix B

1978<sup>L</sup>

## Appendix B



we feared this was one of the latter.

Upon receiving the final report, the director of the U.S. Fish and Wildlife Service, Lynn Greenwalt, sat down to construct a response. The tenor of that would signal how well the government had spent its money and our time.

'I was concerned primarily for the future welfare of wildlife on refuge lands,' John commented after the report had been filed. 'With such wide organizational support for our recommendations, we knew the report had clout in its own right. But if the Fish and Wildlife Service attacked it, reforming the old policies would become much more difficult.'

As the weeks ticked by, secrecy shrouded the director's response. Word leaked out that a lengthy reply was on the way, but there was no hint of its content. Since the report's fundamental thread was that 'all refuge activities must preserve, maintain, or enhance wildlife and other national resources,' we wondered how the government could be anything but enthusiastic without abrogating its mandate to run a wildlife refuge system at all.

More word leaked out: The Service had prepared a response four times longer than the original document. Further, 10,000 copies had been printed, probably for distribution at the 43rd North American Wildlife Conference in Phoenix, Arizona. It looked like an effort to bury the task force's thinking in a heap of bureaucratic mumbo-jumbo, and then drown out the debate with the sheer volume of their arguments.

A few days before the North American conference, the Secretary of the Interior (Greenwalt's boss) roared his disapproval of the process. His own office had been given no opportunity to review the document, while 10,000 copies were rolling off the press. He was understandably upset. All this nearly sent the original task force effort, together with the director's comments, straight to the same legendary warehouse that stores leftover swine flu vaccine and the 1974 gas-rationing stamps. But eventually the controversial document was released.

After all the machinations, Lynn Greenwalt's comments were anticlimactic. Essentially, he agreed with 18 of the task force recommendations, accepted the basic intent of two others, and rejected six. The rejections took most of the space and generated much of the paranoia on all sides.

There was a pattern to the comments: Keep the status quo. Each recommendation that represented little or no change from current policy was warmly

embraced. For example, No. 13 called for the Service to invoke social work programs (such as the Youth Conservation Corps) to augment the limited personnel on refuges. No hint of controversy here. The director called this a 'persuasive recommendation' and 'something to be considered,' although he called for no action.

Likewise, No. 11, urging cooperation with private organizations and public participation, received 'strong endorsement.' Since the Service has worked with private organizations and held public hearings for years (in compliance with the Administrative Procedures Act), endorsement was easy.

But recommendations that cut against the grain of existing policy failed to receive strong endorsement or, in some cases, even consideration. For instance, one of the easy points for the task force to agree upon was No. 17:

Use of pesticides and animal control should be last resorts, employed when no feasible alternatives exist, used only when necessary for proper management of wildlife, and keeping in mind the desirability of maintaining balanced ecosystems. These practices are generally inimical to wildlife conservation, and their use should require special justification.

Pesticides? Animal control? The uninitiated often react to this recommendation with surprise. 'I thought refuges were safe places for wildlife.' Unfortunately, a raccoon on a wildlife refuge is part of its wildlife only until, following its instincts, it eats a duck egg. It then becomes an object for a 'control program' in the eyes of some refuge managers, without reference to any primary goal of maintaining balanced natural ecosystems. On this point, Director Greenwalt used a page and a half to justify the status quo.

All the task force recommendations opposed by the director's comments focused on a common theme: the activities on wildlife refuges that are detrimental to wildlife or other natural values. The task force clearly rejected general use of grazing, timbering, pesticide application, and similar practices. Yet the director signaled reluctance to protect wildlife on refuges or to protect refuges from certain traditional, although incompatible, activities.

The task force treated hunting and trapping with kid gloves. These were the most sensitive issues considered. But once mutually acceptable language had been written, the members stood behind it unanimously, calling for major changes in the current policies. The

group insisted that all hunting and trapping 'be consistent with the [National Wildlife System's] primary purpose to enhance, protect, and preserve wildlife resources.' Within existing law, hunting and trapping should be permitted primarily to manage wildlife populations properly. Further, the task force recommended that such management use only the most humane techniques available.

This recommendation stimulated a blithering, four-page response from the director. He argued, variously, that 'harvestable surpluses' of wildlife will die anyway, so hunters might as well take them; that if we wait until wildlife has 'overpopulated' the land before initiating hunting and trapping, disease and habitat abuse will result; and that even suggested regulations urging qualified hunters and trappers are unnecessary. The director's response would have been laughable if the stakes weren't so high; in 1974, recreational hunting and trapping resulted in the killing of over 787,000 animals on lands called wildlife refuges.

John Grandy and some of the other task force members were simultaneously struck with frustration and anger. They had been told they were helping chart the course of federal stewardship over wildlife refuges, and then found their innovations stomped into the mud like an illegally killed duck.

The refuge system is at a crossroads. These areas are, or should be, set aside for the protection of wildlife. Refuges are the only public lands in the United States which are so designated, and they must be managed primarily on this principle. 'If Director Greenwalt's comments stand,' said Grandy, 'the National Wildlife Refuge system will lose its value to the public and certainly decline as a haven for wildlife.'

The story still lacks the most important chapter. The task force report and director's comments are open for public comment. You are specifically, enthusiastically, invited to participate. We can overcome the frustrations in this program if everybody helps.

Please act now. Write directly to the Secretary of the Interior (ask for a copy of the Recommendations on the Management of the National Wildlife Refuge System first, if you wish) and urge him to accept the recommendations of the task force:

The Honorable Cecil D. Andrus  
Secretary of the Interior  
Department of the Interior  
Washington, DC 20240

# Greenwalt Backs Game Harvest on Refuges

By JAMES PHILLIPS

Associated Press Writer

WASHINGTON (AP) — U.S. Fish and Wildlife Service Director Lynn Greenwalt, in a rare outburst of anger, wants to stop any movement aimed at ending hunting, fishing or

trapping on some national wildlife refuges.

"It should be made clear that the service holds that hunting, fishing and trapping ... are recognized as legitimate recreational activities," Greenwalt said.

His declaration surprised many observers because it came prior to the release of a refuge task force suggestion that some forms of hunting, especially resident, nonmigratory species of birds and animals, should be halted.

TRADITIONALLY, task force reports are issued with the request that interested parties comment on any recommendations. The service then reviews the comments from the public before deciding which recommendations to adopt or reject.

But Greenwalt apparently felt so

strongly about the issue that he decided to include his comments with the task force report and ordered 10,000 copies printed. He also asked individuals to give their opinion on the issue.

One task force member, Dr. John Grandy, executive vice president of Defenders of Wildlife and a critic of refuge hunting, argued Greenwalt's actions make the process meaningless. "What's left for the public to comment about?" he asked. "Greenwalt's already made up his mind!"

THE ISSUE first surfaced publicly in an Associated Press report and threatens to become more heated in the future, especially over the method in which it was handled.

While Greenwalt asked for comments on his personal opinions, he also spoke for the service.

"The service cannot agree with the implication that hunting or fishing or trapping is not a legitimate activity," he said in the report.

National wildlife refuges provide some sportsmen with a place to hunt. It is especially important to many western hunters. The species hunted include big game, small game, upland birds and waterfowl.

SOME INDIVIDUALS, such as Grandy, argue that wildlife refuges should give priority to wildlife, providing them with surcease from hunting pressure.

Greenwalt, however, argues that nature often provides an abundance, and that these individuals will die regardless of man's activity. Some birds will succumb to disease, others will be eaten by hawks, and still others may perish from starvation.

There is no reason, Greenwalt argues, to prohibit man from taking excess wildlife via the gun, bow or trap, even on some wildlife refuges.

"Consumptive use of wildlife, when properly managed, has no adverse effect on the long-term well-being of fish or wildlife populations or their habitats," he said.



IMPORTANT

April 4, 1978

Dear Member:

You have received or will shortly receive in the mail from the U.S. Fish and Wildlife Service a copy of the report from the National Wildlife Refuge Study Task Force entitled "Recommendations on the Management of the National Wildlife Refuge System". With it is a detailed analysis by FWS Director Lynn Greenwalt and his paragraph by paragraph reaction to the recommendations in the Report. If by April 10th you have not received this document, and it is not readily available to you from other sources, please telephone or write to the above address and we will see that a copy is promptly made available.

The National Wildlife Refuge System report is the result of several months of deliberation by ten individuals with a common intense interest in the National Wildlife Refuge System but with widely differing philosophies on how a National Wildlife Refuge should be managed. The recommendations, therefore, reflect a sort of middle-ground approach to many of the issues. No Task Force member was entirely in agreement with every one of the recommendations and I am sure that each of you will have objection to some of them.

The representation on the Task Force parallels to a degree the membership of the National Wildlife Refuge Association. We have members who sincerely believe that a refuge is a true sanctuary--that wild creatures therein should be given full and complete protection at all times; and members with opposing views--that hunting, for example, should be an integral part of management on most refuges.

The ultimate direction of the National Wildlife Refuge System will rest heavily with the recommendations which are finally adopted as a result of this study. Too, this is the first time that the Fish and Wildlife Service has afforded the public at large an opportunity to participate fully and directly in a major decision-making process. For these reasons, it is imperative that you immediately review this report, along with the Director's comments, and submit your reactions to the Director, Fish and Wildlife Service, U.S. Department of the Interior, Washington, D.C. 20240. The Service was not able to meet the schedule reported to you in the last BLUE GOOSE FLYER and, because of the delay in getting this material to you, we are advised that you now have until May 15, 1978 to get your recommendations to Washington, D.C.

After considerable thought, we believe that the Association should not take a formal position on any of the issues, except for - Section IV, Organization, but that each of you should state your own case, based on your personal beliefs. Our position is influenced,

by the fact that the undersigned was a member of the Task Force and the recognition that each of you has your own idea on how a National Wildlife Refuge should be managed.

We make an exception with respect to Section IV, Organization (Task Force Recommendation 9) and urge that you fully support the recommendations of the Task Force for three reasons:

1) This one area in which virtually all members of the Task Force were in complete agreement; 2) Director Greenwalt has opposed this organization recommendation and counters with an organizational proposal that does little to change the present system; and 3) The Director's suggested approach does not accomplish the objectives for which the Association has been working since its inception.

The NWRA came into being largely because of our concern for the ignominious position in which the Fish and Wildlife Service, under its new organizational structure and related program management system, had placed the National Wildlife Refuge System. The world's largest collection of lands devoted exclusively to wildlife habitat preservation and one of the nation's largest land management agencies deserved something better than to be placed in a position where it is nothing more than one of the contributors to a number or broad program categories assigned by the Fish and Wildlife Service.

The Refuge System enjoys a good measure of support from the Congress and this has been reflected in recent years by increased appropriations; but, because of the machinations inherent in the current organization and program-oriented budgeting structure, the Service and/or the Department can and does divert funds appropriated for Refuges to other Service functions. A recent case in point are the plans to divert \$5.2 million of Bicentennial Land Heritage Program funds scheduled in fiscal year 1979 for Refuge rehabilitation to the Fish Hatcheries program.

It was initially believed that the only way to change this unsatisfactory arrangement was to physically separate the Refuge System from the Fish and Wildlife Service, and legislation to accomplish this was introduced into the last two sessions of Congress. This legislation, which has not progressed, was not initiated by the Association but at one time had our support. We currently are working to keep the Refuge System within the Fish and Wildlife Service, but only if there can be established the type of organization recommended by the Task Force.

We cannot agree with the Director that "the question appears to be one of whether to decentralize Service management, or to centralize management," the inference being that the Task Force calls for more centralization. Under the present organization, and this will

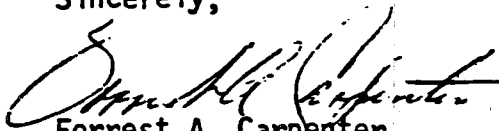
not be changed by the Director's proposed restructuring, five individuals in Washington D.C. control the entire decision-making process: the Director, the Deputy Director and, particularly, three Associate Directors (Program Managers). This is hardly decentralization.

One of the basic issues is whether the National Wildlife Refuge System can be an end in itself. We pose the question, "Is the U.S. Fish and Wildlife Service an end in itself?" Certainly it is only "part of a complex mechanism by which the Service contributes to the continued well-being of fish and wildlife....throughout the country." We support the idea that Refuges can and should be an identifiable entity as are the National Parks and National Forests.

The Director is concerned that the reorganization proposed by the Task Force will damage the program management system. This need not be so. We envision the reorganization of the Fish and Wildlife Service into two broad categories: 1) The National Wildlife Refuge System, and 2) Other FWS Activities. Each would be under a Deputy or Associate Director. The program management concept can be applied to each of these categories, the only difference being that there would now be two broad categories or functions of the Service where there is presently only one.

Again, let me stress the importance of positive action by every member of the Association in responding to this report. This is your chance to let the Director know how you feel about the report and his reaction to it. Remember that your comments must be in his hands by May 15, 1978!

Sincerely,



Forrest A. Carpenter  
President  
National Wildlife Refuge Association



U.S. Fish & Wildlife Service  
1011 E. Tudor Road  
Anchorage, Alaska 99503