August 31, 2005

U.S. Fish & Wildlife Service
Upper Mississippi River National Wildlife and Fish Refuge
Attention: CCP Comment
51 East 4th Street
Room 101
Winona, MN 55987

The Midwest Office of the Izaak Walton League of America offers the following comments on the Comprehensive Conservation Plan:

--We support the development of the CCP as an important and necessary effort to conserve Upper Mississippi River Fish and Wildlife Refuge resources and to continue to make those resources available to a growing and diverse population of river users.

--Management must be balanced in a manner exemplified by alternative D in the CCP. However, specific components should be further scoped and modified to better represent needs, balance, sustainability and marketability.

--Doing nothing (Alternative A) is naively accepting the loss of the river we love today. We believe that Upper Mississippi ecological resources have diminished significantly, with the best habitats only remaining in the upper and center reaches of most pools. In addition, public use is typified by larger and more powerful watercraft being used by a growing and more demanding number of users. This is in addition to a 2,500 percent (UMR Boating Study) increase in the numbers of personal watercraft on the Upper Mississippi over the past 15 years. Given these trends, we believe use and habitat cannot coexist without intervening management.

--Closed areas, if closed to minimize waterfowl disturbance (designed to reduce migratory energy losses), should be closed to all activities, not just hunters. Closed areas should also remain closed for a period after the hunting season till the majority of migrating waterfowl have moved through those respective areas. They should be sized and located based on balanced consideration of defined biological need and documented public use.

--Restrictive use and access by vehicle type should have a seasonal consideration. Noise disturbance to people is still a factor to be considered.

--Tournament fishing (primarily bass and walleye) should be managed from two perspectives. First, there are competitive versus public uses as exemplified by conflicts between bass boats and smaller fishing craft or canoes. Second, fishing tournaments should be managed from a fish stock perspective implemented in conjunction with the local Department of Natural Resources fisheries managers.

--The plan must clearly consider the economic impact of all recreation forms. This is needed to fully recognize Congress's classification of the Upper Mississippi River as a valuable economic and ecological resource.

Thank you for this opportunity to comment.

Brad Redlin
Director, Upper Mississippi River Program
Izaak Walton League of America
1619 Dayton AVE, STE 202, St. Paul, MN 55104
651.649.1446 office 651.270.0564 mobile
bredlin@iwla.org