



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage  
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#### Public Comments Processing

Attn: Docket No. FWS-HQ-NWRS-2020-0013

U.S. Fish & Wildlife Service Headquarters

5275 Leesburg Pike

Falls Church, VA 22041-3803

June 5, 2020

#### **Re: 2020-2021 Station-Specific Hunting and Sport Fishing Regulations Docket No. FWS-HQ-NWRS-2020-0013**

Michigan United Conservation Clubs is a 501(c)3, grassroots, conservation organization with more than 200 affiliate clubs and 40,000 members. Our positions on conservation-related topics are derived from our members through a grassroots policy process, and they have established strong support for increasing hunting and fishing opportunities on public lands. Our mission is “to unite citizens to conserve, protect and enhance Michigan's natural resources and outdoor heritage” and, as such, we would like to express our support of this proposed rule which would increase opportunities for hunting and fishing across the nation.

The National Wildlife Refuge System (NWRS) is represented in all 50 states and U.S. territories and provides ample opportunities for striking balance between outdoor recreation and natural resource conservation. Under the National Wildlife Refuge System Improvement Act of 1997, Congress established that National Wildlife Refuges should be established and maintained “to foster understanding and instill appreciation of fish, wildlife, and plants, and their conservation” by “such uses includ[ing] hunting, fishing, wildlife observation and photography, and environmental education and interpretation.” These six uses were explicitly enumerated as the main objectives of the NWRS and it is clear that hunting and fishing are listed at the forefront of these goals.

This proposed rule would promote hunting and fishing opportunities by opening eight NWRs that are currently closed to hunting and sport fishing and would open or expand hunting and sportfishing at 89 other NWRs. This rule would also add pertinent station-specific regulations for other NWRs pertaining to a wide variety of hunting and fishing opportunities. In Michigan, the Jordan River National Fish Hatchery would be opened to a wide range of recreational activities under this rule. Hunting and fishing contribute to a robust outdoor recreation economy in the

state of Michigan, generating \$11.2 billion and 171,000 jobs annually in the Great Lakes State.<sup>1</sup> MUCC is proud to advocate for expansions of outdoor recreation opportunities that could further benefit this industry.

MUCC does recommend that the USFWS further review the species permitted to hunt at the Jordan River National Fish Hatchery, as it appears that the proposed rule allows for the taking of doves and does not mention ruffed grouse. With a history of hot debate and contested ballot initiatives, the state of Michigan does not consider doves to be a game species and we ask that the USFWS consider clarifying this rule to maintain consistency with state game regulations. MUCC would also request that the USFWS consider adding ruffed grouse to the list of upland birds that may be harvested from this specific station, as these are a commonly hunted species in this area of the Northern Lower Peninsula of Michigan. We do not anticipate that this would be a contentious alteration.

MUCC is also supportive of the efforts outlined in this proposed rule to simplify hunting and fishing regulations in National Wildlife Refuges with those of the states. These efforts will make it easier for hunters and anglers to recreate in wildlife refuges, without the burden of site-specific bag limits or equipment restrictions. By moving forward with these aspects of the proposed rule, MUCC believes that the USFWS will be further encouraging an increase in outdoor recreation through the NWRS.

MUCC is especially excited about the opportunity that this proposed rule would have to engage new demographics in hunting and fishing, especially young people. It is likely that these efforts will assist greatly in efforts to recruit, retain, and reactivate sportsmen and women in the state of Michigan.

In closing, the MUCC appreciates the opportunity to comment and encourages you to move forward with proposed rule FWS-HQ-NWRS-2020-0013. Please feel free to contact us if you have any additional questions or comments that Michigan United Conservation Clubs may be of assistance in answering.

Yours in Conservation,



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<sup>1</sup> <https://mucc.org/about-us/economic-impact-study-2019/>