

## **COMPATIBLE USE DETERMINATION**

**Use:** *Hound Field Trials on the Lower Suwannee National Wildlife Refuge*

**Refuge Name:** Lower Suwannee National Wildlife Refuge

**Location:** 16450 NW 31<sup>st</sup> Place, Chiefland, Levy County, Florida 32626

**County:** Levy County and Dixie County, Florida.

**Date Established:** April 10, 1979.

### **Establishing and Acquisition Authorities:**

- Fish and Wildlife Act of 1956 -- (August 8, 1956) [16 U.S.C. 1131-1136]
- Migratory Bird Conservation Act -- (February 18, 1929) [16 U.S.C. 667b]
- Real Property Transfer Act, PL 80-537 -- (May 19, 1948) [16 U.S.C. 742]
- Refuge Recreation Act, and amendments -- (September 28, 1962) and PL 93-205 (December Public Law 93-632, January 3, 1975)

### **Refuge Purpose:**

These purposes and the mission of the National Wildlife Refuge (NWR or Refuge) System are fundamental to determining the compatibility of proposed uses for the Lower Suwannee NWR.

The purposes of Lower Suwannee NWR are:

...” to protect, maintain, enhance, and where appropriate, restore habitats along the lower reaches of the Suwannee River.” (Lower Suwannee and Cedar Keys NWRs Comprehensive Conservation Plan 2001).

- “...for the development, advancement, management, conservation, and protection of fish and wildlife resources...” 16 U.S.C. § 742f(a)(4)\* and
- “...for the benefit of the United States Fish and Wildlife Service, in performing its activities and services. Such acceptance may be subject to the terms of any restrictive or affirmative covenant, or condition of servitude...” 16 U.S.C. § 742f(b)(1) (Fish and Wildlife Act of 1956, 16 U.S.C. § 742f (a) Special Use Permit-754, as amended.

### **National Wildlife Refuge System Mission:**

"The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans" (National Wildlife Refuge System Administration Act of 1966, as amended) [16 U.S.C. §668dd-668ee].

**(a) Description of Use:**

The Lower Suwannee NWR proposes to allow recognized raccoon dog trial associations to conduct sanctioned "Hound Field Trails" under Special Use Permits (SUP). These will be issued in accordance with [FWS Policy 631 FW5, Field Trials](#) (Weblink 4.) and with the "[Compatibility Determination Guidance for Selected Uses in the Southeast Region](#)" (Weblink 3.), and as approved at the Regional Office level prior to the issuance of a SUP by the Refuge.

There are several kennel clubs in the US that promote organized competition raccoon hunts including the [Professional Kennel Club](#) (PKC) (Web Link 6.), [United Kennel Club](#) (Web Link 10.), [American Kennel Club](#) (Web Link 2.). These recognized dog organizations hold a wide variety of events, provide scholarships for youth programs, and are well organized and structured with detailed constitutions and by-laws. Local county dog associations are formed under these national clubs and are governed by raccoon hound [rules and regulations](#) (WebLink 8.) and carry liability insurance policies.

Hunts are organized by local county chapters with a recognized Hunt Director for the event. The events are scheduled and published in the kennel club monthly magazine and website and attract entrants from all over the country with larger events bringing in revenue for local businesses. For instance, the PKC is the nation's largest organization devoted to the registration of coonhounds and to the sport of competitive raccoon hunting. With headquarters in Evansville, Indiana, PKC licenses more than 8000 night-hunts for coonhounds annually, in addition to hunting competitions for squirrel dogs and beagles.

PKC differs from other coon hunting-related registries in that monetary awards are earned by the winners of its competitions. Degrees are earned in accordance with dollars earned. PKC sponsors annually a World Championship, a National Championship, a Futurity Championship, and a three-division (Sophomore, Junior, Senior) Super Stakes Championship for coonhounds. Additionally, there are World Championships for squirrel dogs and beagles. Firearms are not permitted during any event, nor is any game taken in any PKC event. Dogs are evaluated according to a [prescribed set of rules for each event](#) (WebLink 5.). The participants themselves formulate the rules for PKC events. PKC and the National Association participate in periodic national meetings for this purpose.

The Refuge is supportive of pursuing this wildlife-oriented public use recreational activity under a SUP issued to the requesting organization. The NWR already allows night hunting for racoons under our usual hunting program in compliance with the Compatibility and Appropriate Use policies.

Working with the field trial applicants we would ensure that the SUP will specify conditions of use such as access routes, specific areas of activity, type of target animals (coons), litter cleanup during and after the trial, and sanitation facilities. During the field trials, outside of the sanctioned night hunts, we would not permit the use of firearms.

The field trials will be contained in an area that will accommodate the trial without undue disturbance to field office operations and other public uses. There will be no permanent physical facilities constructed or located on our lands for the support of field trial activities. Any necessary portable facilities, should any be needed, will be removed from the field office at the end of each field trial. All costs for temporary facilities and the conduct of a trial are the responsibility of the permittee.

As mentioned, firearms will not be permitted as these are no-kill trials and no target animals will be used or released as the applicants are only focusing on treeing native, wild racoons, resident on the NWR.

**(b) Where will the use be conducted?**

Raccoon Hunt Trials will be conducted on Lower Suwannee NWR's publicly accessible lands, roads, and trails, in Levy and Dixie Counties.

**(c) When will the use be conducted?**

Hound raccoon field trials will be conducted as prescribed by a SUP, at night, with trials taking approximately two hours. This use, conducted at night, will occur during times when there are no other hunts scheduled and the refuge is closed to the general public that is not authorized to access the refuge without a SUP. (The refuge routinely issues SUPs for certain recreational uses when the refuge is closed to the general public between sunset and sunrise, such as, but not limited to dark skies star gazing, meteor shower viewing, wildlife viewing, and moonlight paddling.)

**(d) How will the use be conducted?**

Events are held with entrants applying by a set deadline. The judges draw out a dog and handler pair forming a group called a “cast”. Hound raccoon trials are conducted at night with a cast composed of a dog, hunter, guide, and judge. The cast’s judge ensures that the hunt is conducted strictly by established rules. The guide will take the cast to the land where they will hunt with the judge and cast members staying together during the hunt. Dogs will be released, and the judge keeps score of all raccoons that are treed. In the test the dog races against the clock baying the location and treeing of a raccoon. During field trials, raccoons may not be killed, and treed raccoons must be seen before points are awarded. Firearms are not a part of the test.

Trials take approximately two hours. Two-hour hunts intend to not unduly pressure the wildlife in the hunt area. After the two hours all dogs will be picked up and returned to the club house. After all casts have returned to the club house the Hunt Director will look at all score cards to determine the winners. During these organized events there are no firearms, alcohol, or unprescribed drugs allowed.

The uses will be conducted through existing public access facilities and by foot behind the closed gates. The Refuge does not anticipate allowing any special vehicular access to the gated, closed-to-the-public secondary roads and trails that the public does not currently have seasonal access to.

**(e) Why is the use being proposed?**

The use is being proposed as the Refuge received a request from a PKC group to allow such a use, and we intend to be consistent with the [State of Florida’s Fish and Wildlife Commission field trial programs](#) (WebLink 9.) The objective for considering this use is to provide yet another wildlife-dependent recreational opportunity, that is consistent with the Refuge’s CCP and public use management plans, for the public that does not adversely impinge on the Refuge’s purpose. Additionally, we endeavor to promote an even better relationship between the Refuge and outdoor recreationists as well as create diverse recreational opportunities for young people over future generations.

**Availability of Resources:**

The cost of allowing this use on the Refuge is absorbed within the Refuge's operating budget as this use lies mainly with the local club organizing the event. This use does not require additional staff for enforcement or other purposes. Within the operating budget, personnel time associated with administration and law enforcement, maintenance, and monitoring of sites for impacts of public use are included and are expected to be negligible. Hound field trials can fit into our current 128-day season encompassing ten publicly scheduled hunts (and special non-public hunts), including a 16-day night hunting (with dogs for raccoon) season.

*Resources involved in the administration and management of the use:*

Personnel time associated with routine public uses administration, maintenance, and law enforcement are involved. Existing staffing and funding are currently adequate to support hound field trials, what we feel is a low impacting activity. Refuge staff will direct whatever maintenance, administration, and management that is required regarding hound field trials within our existing public use program.

*Special equipment, facilities, or improvements necessary to support the use:*

The Refuge does not anticipate any special equipment, facilities, or improvements outside of our normal public use road and trail maintenance program for hound field trials. The Refuge foresees the ability to aid as needed within our usual operating schedules, capacity, and infrastructure, as all are deemed sufficient to support hound field trials.

*Maintenance costs:* The SUP'd hound field trial applicants will be responsible for the eventual conditions and parameters under the permit. Working with the field trail applicants we would ensure that the SUP will specify conditions of use such as access routes, mode of access, specific areas of activity, type of target animals, litter or debris cleanup during and after the trial, and sanitation facilities, should any of this be a consequence.

The field trials will be prescribed in the SUP in an area that will accommodate the trial without undue disturbance to field office operations and other public uses. There will be no permanent physical facilities constructed or located on our lands for the support of hound field trial activities. Any necessary portable facilities, should any be needed, will be removed from the field at the end of each field trial. All costs for temporary facilities and the conduct of a trial are the responsibility of the permittee and will need to be clearly articulated in the permit application.

Maintenance costs are expected to be minimal or nonexistent from this use on the Refuge. There are no expected increased costs to maintain Refuge infrastructure outside of other routine public uses on our road and trail network.

*Monitoring costs:* Refuge staff and volunteers will monitor costs and other impacts of the hound field trials. Monitoring and compliance requirements will be handled within existing resources, programs, and staff time.

*Offsetting revenues:* None required as these events do not cost the refuge any additional efforts or resources.

### **Anticipated Impacts of Use:**

#### *Short-term Impacts:*

Studies have been conducted on the effects of raccoon hunting on deer movement and deer hunter's success in bagging deer when there were raccoons hunted in the same area at night. No significant deer movement changes were observed with radio-tracked deer moving the same distances and during the same times of day from when no hunt occurred in comparison to when a raccoon hunt was held the previous night ([South Carolina Department of Natural Resources, 2017](#)).

#### *Long-term Impacts:*

For 32 years, a Raccoon Field Trial Survey of United Kennel Club raccoon field trial events was conducted to examine trends in hunting success rates by regions in North Carolina. The 32 years of data indicate there has been no decrease in the number of raccoons seen per hour, the number of rabies cases decreased, and the harvest rate of raccoons per hunter has not changed during this time frame ([North Carolina Wildlife Resources Commission, 2019](#)).

#### *Cumulative Impacts:*

No cumulative impacts (reasonably certain to occur but occurring later in time) are anticipated from this use; however, the Refuge will work with the Florida Fish and Wildlife Commission's hunting program and with the University of Florida's Wildlife Ecology and Conservation department to seek potential funding and conduct research on this activity.

### **Public Review Comment:**

A 30-day public review and comment period will begin on 23 June 2020 and will end on 24 July 2020. Copies of the document will be displayed in the [Lower Suwannee and Cedar Keys National Wildlife Refuges office](#); please call for an appointment: 703.622.3896. The document will also be available on the [Lower Suwannee National Wildlife Refuge website](#), the [Friends of the Lower Suwannee and Cedar Keys National Wildlife Refuges website](#), and distributed to local news outlets: Cedar Key News, Gainesville Sun, Dixie County Advocate, and the Chiefland Citizen.

**Determination:**

Use is Compatible with Following Stipulations

Use is Not Compatible

**Stipulations Necessary to Ensure Compatibility:**

As approved at the Regional Office level prior to the issuance of a SUP by the Refuge, the Lower Suwannee NWR proposes to allow recognized raccoon dog trial associations to conduct sanctioned “Hound Field Trails” under SUPs issued in accordance with [FWS Policy 631 FW5, Field Trials](#) (WebLink 3.) and with the “[Compatibility Determination Guidance for Selected Uses in the Southeast Region](#)” (WebLink 2.).

**Justification:**

Lower Suwannee NWR already conducts a [16-day night-hunt raccoon season with dogs](#) (WebLink 1.) as the [Refuge’s Comprehensive Conservation Plan \(CCP\)](#) (Weblink 7.) identifies “Public Use Objective 4.5 - Provide opportunities for hunting and fishing on the refuge in a manner which minimizes conflicts between consumptive and non-consumptive user groups, Strategy 4.5.1 - Provide high quality hunting opportunities for small game, big game, and waterfowl in accordance with the approved 1988 Refuge Hunt Plan” (Lower Suwannee and Cedar Keys NWRs CCPs, 2001). The 1988 Refuge Hunt plan cites an Environmental Assessment’s Finding of No Significant Impact of the small game hunt program, which included raccoons. Also, the 2001 CCP conducted an Environmental Assessment and Finding of No Significant Impact on hunting in its finding that small game (including raccoons) hunting is a compatible use. Raccoon hound field trials would be the essentially same activity as night-hunt raccoon season with dogs, but with the significant distinction that no raccoons are killed as part of a field trial.

After fully considering the impacts of this activity, it is the Refuge’s determination that this use will not materially interfere with or detract from the purposes of the Refuge(s) or the mission of the Refuge System. These activities will remain compatible with the implementation of the listed stipulations.

This Compatibility Determination is based on sound professional judgement and the best available science.

This use complies with Department of the Interior policy as follows:

- Department of the Interior Policy 516 DM 8.5 B (7) Categorical Exclusions: Minor changes in the amounts or types of public use on Service or State-managed lands, in accordance with existing regulations, management plans, and procedures.

**NEPA Compliance for Refuge Use Description:**

- X**   Categorical Exclusion without Environmental Action Statement
- Categorical Exclusion and Environmental Action Statement
- Environmental Assessment and Finding of No Significant Impact
- Environmental Impact Statement and Record of Decision

**Mandatory 10-year Re-evaluation Date:** May 2020

**References:**

1988. Lower Suwannee NWR Hunting Plan. U.S. Fish & Wildlife Service, National Wildlife Refuge Program, Atlanta, Georgia.

2001. Lower Suwannee and Cedar Keys NWRs Comprehensive Conservation Plans. U.S. Fish & Wildlife Service, National Wildlife Refuge Program, Atlanta, Georgia.

2017. South Carolina Department of Natural Resources. “The Impact of Sport Raccoon Hunting on Deer Movement and Deer Hunting Success”, South Carolina DNR Furbearer Project, Columbia, S.C. 29202;

[https://dc.statelibrary.sc.gov/bitstream/handle/10827/30384/DNR\\_Impact\\_of\\_Sport\\_Racoon\\_Hunting\\_2006.pdf?sequence=1&isAllowed=y](https://dc.statelibrary.sc.gov/bitstream/handle/10827/30384/DNR_Impact_of_Sport_Racoon_Hunting_2006.pdf?sequence=1&isAllowed=y)



2019. North Carolina Wildlife Resources Commission. “North Carolina Raccoon Field Trial Survey Report 1987 Through 2019, 32nd Year”, Colleen Olfenbuttel, Black Bear and Furbearer Biologist, North Carolina Wildlife Resources Commission;  
[https://www.ncwildlife.org/Portals/0/Hunting/Documents/NCRaccoonFieldTrial\\_report97\\_17.pdf](https://www.ncwildlife.org/Portals/0/Hunting/Documents/NCRaccoonFieldTrial_report97_17.pdf)

### **WebLinks:**

1. 16-day night-hunt raccoon season with dogs:  
<https://www.fws.gov/uploadedFiles/Lower-Suwannee-Hunt-Brochure.pdf>
2. American Kennel Club: <https://www.akc.org/>.
3. Compatibility Determination Guidance for Selected Uses in the Southeast Region:  
<https://ecos.fws.gov/ServCat/DownloadFile/164635?Reference=111421>.
4. FWS Policy 631 FW5, Field Trials: <https://www.fws.gov/policy/631fw5.html>.
5. Prescribed set of rules for each event:  
<http://www.prohound.com/images/PDF/BlueBook/BlueBook2020-2023.pdf>
6. Professional Kennel Club: <https://www.prohound.com/>.
7. Refuge’s Comprehensive Conservation Plan:  
<https://www.fws.gov/southeast/planning/PDFdocuments/LowerSuwannee/Lower%20Suwannee%20Final%20CCP.PDF>
8. Rules and regulations: <https://www.ukcdogs.com/docs/rulebooks/2020-coonhound-rulebook.pdf>.
9. State of Florida’s Fish and Wildlife Commission field trial programs:  
<https://myfwc.com/license/public-land-use/special-use-other/>
10. United Kennel Club: <https://www.ukcdogs.com/>