



THE TRUMPETER SWAN SOCIETY

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Working to assure the vitality and welfare of wild Trumpeter Swans since 1968

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Public Comments Processing

Attn: FWS-HQ-NWRS-2026-1223

U.S. Fish and Wildlife Service

5275 Leesburg Pike, MS: PRB (JAO/3W)

Falls Church, VA 22041-3803

Comments on Proposed Rule, National Wildlife Refuge System 2026–2027 Station-Specific Hunting and Sport Fishing Regulations (91 FR 31580, May 27, 2026); Docket No. FWS-HQ-NWRS-2026-1223

Dear Director Nesvik:

The Trumpeter Swan Society (TTSS) submits these comments on the proposed 2026–2027 station-specific hunting and sport fishing regulations for the National Wildlife Refuge System administered by the U.S. Fish and Wildlife Service (Service). TTSS is a nonprofit scientific organization founded in 1968 and dedicated to the conservation and restoration of wild trumpeter swans. In 2021, the TTSS Board adopted a policy statement recognizing lead as a significant threat to trumpeter swans and other wildlife and supporting elimination of lead deposition from hunting and fishing activities (TTSS 2021). That policy reflects more than five decades of active research, including peer-reviewed investigations of swan lead poisoning and a long-term program at Judson Lake on the Washington–British Columbia border where spent lead caused documented swan deaths despite existing waterfowl shot restrictions. TTSS staff contributed to peer-reviewed investigations of swan lead poisoning, including Degernes et al. 2006, and has a direct interest in management decisions affecting lead exposure risks on National Wildlife Refuges.

TTSS supports hunting and fishing on National Wildlife Refuges when compatible with refuge purposes and sound wildlife management. Our comments address lead exposure risks created by this rulemaking: the rescission of finalized lead-free requirements at ten National Wildlife Refuges, the reversal of existing lead restrictions at additional stations, and the opening of new hunting and fishing opportunities in wetland habitats used by swans without equivalent lead protections.

The following comments focus on trumpeter and tundra swans, which are the subject of TTSS's primary scientific expertise and program experience; however, our concerns extend beyond swans and refuge boundaries.

Lead poisoning is a well-documented cause of wildlife mortality. A study published in *Science* found that lead poisoning slows bald eagle population growth by 3.8 percent annually across North America (Slabe et al. 2022), a finding cited in several of the administrative documents reviewed by TTSS. Lead poisoning is also a significant mortality factor in trumpeter and tundra swans specifically. Ingested lead is readily absorbed and causes systemic toxicity. Multiple studies have identified lead poisoning as a significant mortality factor in swans across North America (Blus et al. 1989; Lagerquist et al. 1994; TTSS 2009). A consistent finding in the literature is that lead poisoning persisted after the transition to non-toxic shot for waterfowl hunting. The principal sources of exposure were spent shot associated with pre-lead ban waterfowl hunting that persists in wetland sediments, upland hunting, and lost fishing tackle. Lead fishing tackle presents a separate and well-documented exposure pathway. Swans forage in shallow-water habitats and may ingest sinkers, split shot, and jig heads while feeding. This pathway is of particular concern because a single ingested lead object can be fatal (Franson et al. 2003). Restrictions limited to waterfowl hunting therefore do not eliminate lead exposure risks where upland hunting and fishing occur in or near habitats used by swans.

The professional wildlife management community has broadly recognized the risks posed by lead ammunition and fishing tackle. The Wildlife Society has formally concluded that conclusive population-level impacts need not be the threshold for implementing policies designed to reduce lead exposure in wildlife (The Wildlife Society 2022). The Association of Fish and Wildlife Agencies has similarly endorsed voluntary best management practices promoting non-toxic alternatives (AFWA 2025).

The federal requirement for non-toxic shot for migratory waterfowl hunting remains unchanged. The proposed rule rescinds broader refuge-specific restrictions on lead ammunition and fishing tackle at ten National Wildlife Refuges. Those requirements were finalized through notice-and-comment rulemaking in 2022 and 2023 (USFWS 2022, 2023) and are scheduled to take effect on September 1, 2026. This rule proposes to rescind them before they ever take effect. Nine of the ten refuges are identified in Table 1 of the proposed rule: Patoka River NWR in Indiana; Great Thicket NWR and Rachel Carson NWR in Maine; Blackwater NWR, Eastern Neck NWR, and Patuxent Research Refuge in Maryland; Erie NWR in Pennsylvania; and Chincoteague NWR and Wallops Island NWR in Virginia. At a tenth refuge, Canaan Valley NWR in West Virginia, the proposed rule retains the lead fishing tackle restriction but does not include the hunting area lead-free requirement that prior compatibility analysis indicated was necessary, leaving that refuge's hunting program without those protections. As a result of these rescissions, lead

ammunition could again be used for hunting non-waterfowl species and lead fishing tackle could again be used at these refuges.

The same rule proposes new or expanded hunting and fishing at least 111 field stations across 32 states, including stations in the breeding, migration, and wintering range of trumpeter and tundra swans. Many of these openings include upland hunting and sport fishing in or adjacent to wetland habitats used by swans, creating lead exposure pathways not addressed by existing waterfowl shot requirements. TTSS reviewed the station-level administrative documents for more than twenty of those openings to assess whether lead exposure risks to swans had been evaluated.

That review found a consistent gap across the country: where documents propose new hunting and fishing activities at refuges within confirmed swan range among the more than 111 stations in this proposed rulemaking, TTSS found no lead exposure analysis for trumpeter or tundra swans. Where such analysis is absent, the record does not support a conclusion that lead exposure risks to swans are negligible. Where the Service concludes that a proposed activity poses no credible lead exposure pathway for swans, that conclusion and its reasoning should appear in the record.

Across those documents, there is a consistent pattern. At refuges where proposed activities create plausible lead exposure pathways in swan habitat, the administrative documents acknowledge lead risks to other species but neither analyze those risks for swans nor explain why such analysis was unnecessary. The following examples from the administrative record illustrate that pattern across the country.

The Klamath Basin documents, covering a major tundra swan migration corridor, and the Grays Lake EA, within core Greater Yellowstone trumpeter swan flock habitat, show the same gap: lead risks acknowledged for other species, no analysis or explanation for swans.

At Malheur NWR in Oregon, a historic site for trumpeter swan restoration and translocation in the Pacific Flyway, the compatibility determination cites Stauber et al. 2010, Bedrosian et al. 2012, and Slabe et al. 2020 and 2022, and acknowledges that lead exposure decreases eagle population growth rates and likely holds eagle populations below what they would otherwise be. The document resolves the significance question by noting that Malheur accounts for only a small share of regional lead deposition. That conclusion is based on the refuge's relative contribution to regional lead deposition rather than an analysis demonstrating that the biological impacts themselves are insignificant. That reasoning could be applied to any individual refuge in the system and would preclude a finding of significant lead impacts at any of them, regardless of documented biological effects. National Wildlife Refuges are public lands held in trust for present and future generations; lead deposited there persists in wetland sediments for decades, and the cumulative biological effects on wildlife using those habitats are not diminished by any individual refuge's proportional share of regional deposition. The compatibility determination does not acknowledge the risk to the resident trumpeter swans and other waterfowl that depend on Malheur NWR year-round. TTSS has been actively restoring trumpeter swans to Oregon since 2009 through a partnership with the

Oregon Department of Fish and Wildlife (ODFW) and USFWS, with birds released at Summer Lake Wildlife Area moving across the broader landscape including refuge wetlands (TTSS 2026). ODFW independently identifies lead poisoning as a documented limiting factor for trumpeter swans in Oregon and calls for continued translocation efforts to expand the Oregon breeding population (ODFW 2016). The compatibility determination does not acknowledge either finding.

Several compatibility determinations, including those for Minnesota Valley NWR, Glacial Ridge NWR, and Blackwater NWR, acknowledge the finding of Slabe et al. 2022 that lead poisoning suppresses bald eagle population growth rates by 3.8 percent annually, then conclude impacts are insignificant because eagle populations hold a secure NatureServe ranking. Population security and suppression of population growth potential are different questions. A species can be secure today while lead is suppressing the abundance it would otherwise reach. None of these documents acknowledges that distinction. Under that reasoning, lead poisoning could never be considered significant for any species not already in trouble, no matter what the science shows. The same documents that contain this eagle analysis were prepared for refuges where trumpeter and tundra swans are present. None contains an equivalent lead exposure assessment for swans.

The Medicine Lake NWR compatibility determination in Montana identifies tundra swans as present in the refuge wetlands. The document provides no analysis of lead exposure risk for tundra swans anywhere in its text. The lead analysis addresses eagles and raptors generically but does not evaluate lead exposure risks for the tundra swans present in the refuge wetlands, nor does it explain why such analysis was unnecessary. The document acknowledges that lead ammunition is deposited across all hunt zones including wetlands where migratory birds feed, then dismisses significance by asserting that lead disperses and that hunter numbers are low. Lead does not disperse in wetland sediments; it accumulates. Neither assertion is supported by site-specific data.

Big Stone National Wildlife Refuge in Minnesota provides perhaps the clearest example of the analytical gap identified throughout this letter. The refuge is a confirmed trumpeter swan staging area at the headwaters of the Minnesota River in the prairie pothole region. The lead analysis in the Environmental Assessment cites Strom et al. 2009, which found that 25 percent of trumpeter swan fatalities in Wisconsin from 1991 through 2007 were attributed to ingested lead, and acknowledges that swans face heightened exposure risk because their long necks allow foraging at greater sediment depths. The fishing compatibility determination separately acknowledges lead tackle as a source of mortality for swans. The proposed rule opens fishing on approximately 4,263 acres of permanent and semipermanent wetland habitat at Big Stone with no lead tackle restriction. The EA contains no analysis of what the acknowledged swan vulnerability means for swans using those specific wetlands, and no explanation for why that analysis was unnecessary.

Seedskadee National Wildlife Refuge in Wyoming represents the strongest analytical document in the record. A full Environmental Assessment with a dedicated lead analysis section was prepared, and one unit of the Refuge is specifically closed to migratory bird hunting to protect trumpeter swans, confirming

the Service's awareness of their presence and vulnerability. Yet the EA contains no lead exposure analysis directed at trumpeter swans and no explanation for why the species specifically protected in one unit of this refuge required no such analysis. The gap persists even in the most thorough document in the record.

Trumpeter and tundra swans face elevated lead exposure risk relative to most other migratory birds because of their foraging behavior. Unlike raptors, which encounter lead incidentally through scavenging, swans ingest lead directly during routine foraging in shallow wetland sediments, mistaking spent shot and tackle for grit. TTSS-affiliated investigators documented 2,574 swan mortalities over a ten-year period in northwest Washington and British Columbia, with 62 percent confirmed as lead poisoning, in areas where waterfowl lead shot restrictions had been in effect for years (Degernes et al. 2006). The mortality was driven by upland hunting lead and fishing tackle pathways, not waterfowl hunting. Several documents in this rulemaking record cite the same secondary lead exposure pathways in the context of eagle scavenging risk. None applies that analysis to swans.

Taken together, these examples document a recurring analytical deficiency across the documents reviewed. The Service Cumulative Impacts Report for this rulemaking states that it considered the collective nationwide impact of all stations' actions on lead. That analysis, however, does not address trumpeter or tundra swans. Its conclusions rest on station-level findings that themselves contain no swan lead analysis for wetland hunting and fishing activities. Because the underlying station-level analyses do not evaluate lead exposure risks to trumpeter or tundra swans, the cumulative impacts analysis cannot independently support a conclusion that impacts are negligible. While these comments focus on swans as the subject of TTSS's primary expertise, our concerns extend beyond swans and refuge boundaries. A cumulative analysis can only be as complete as the species or guild-level analyses it aggregates. Where those analyses are missing, the cumulative finding is incomplete. The similarity of analytical language used to dismiss lead significance across multiple station-level documents, and the presence in at least one document of regulatory language that appears to reference another state's hunting regulations, raises questions about the independence of the site-specific review underlying these analyses. Where the underlying station-level analyses are incomplete or templated, the cumulative impacts report cannot independently support a conclusion that lead exposure risks to swans are negligible.

Beyond the rescissions, the proposed rule opens hunting and fishing at stations within confirmed trumpeter and tundra swan range where no lead restrictions exist. At Grays Lake NWR in Idaho, within the core habitat of the Greater Yellowstone trumpeter swans, whose status remains of significant concern due to their relatively low abundance and growth rate, the Environmental Assessment states that lead shot will be allowed in the new hunting units and that lead-free alternatives were considered and rejected on deregulatory grounds. New openings at the Klamath Basin refuges in California and Oregon affect additional confirmed swan use areas without lead protections. Lead exposure pathways arise wherever hunting and fishing are introduced at refuges within confirmed swan range, regardless of whether the activity itself occurs in wetland habitat.

The Chesapeake Marshlands Complex illustrates both concerns. Eastern Neck and Blackwater National Wildlife Refuges in Maryland together represent critical habitat for the Eastern Population of tundra swans and one of the largest concentrations of nesting bald eagles on the Atlantic Coast. Eastern Neck supports substantial concentrations of wintering tundra swans annually; the Service refuge website identifies a fishing access area called Tundra Swan Boardwalk within the shallow tidal waters where these birds concentrate and feed, and the lead fishing tackle restriction being rescinded covers those waters. Blackwater supports thousands of additional tundra swans during migration and winter. As the Interior Population of trumpeter swans continues its range expansion into the Atlantic Flyway, both refuges are likely to become increasingly important for that population as well. The Society therefore has a direct interest in the management of lead exposure risks at this complex.

The Blackwater NWR compatibility determination illustrates a concern that extends across the rescission documents. The 2022 Chesapeake Marshlands Hunting and Fishing Plan concluded that lead-free requirements for white-tailed deer, sika, and wild turkey hunting were necessary for compatibility with Blackwater's establishment purpose as an inviolate sanctuary for migratory birds. The current compatibility determination reverses that conclusion without engaging the 2022 scientific findings or identifying new information that would support a different outcome. For tundra swans, which winter in the Chesapeake Marshlands complex in significant numbers, the practical consequence is the removal of protective requirements that prior analysis found necessary, without scientific explanation for why those protections are no longer needed.

Within this same rulemaking there are clear inconsistencies. The Grays Lake NWR waterfowl and migratory bird compatibility determination retains its non-toxic shot requirement and states that neither the existing hunt program nor its proposed expansion will introduce lead into the environment. The Service applies protective lead provisions at some refuges while rescinding them at ten others and opening more than one hundred additional stations without equivalent protections. No document in the record explains the scientific basis for that difference in treatment.

That inconsistency is particularly significant given the ongoing range expansion of the Interior Population of trumpeter swans into the Atlantic, Mississippi and Central Flyways. Refuges in all three flyways will become increasingly important to swan conservation. Status and Trends range data from eBird for 2023 show Interior Population birds distributed across the prairie pothole region, Missouri River valley, and upper Mississippi Flyway states during both migratory and non-breeding seasons, encompassing several of the stations being opened or expanded in this rule (Fink et al. 2024; see Attachment A). Because lead deposited under current management decisions may remain available to wildlife for decades, maintaining lead-free conditions at refuges within the expanding range of Interior Population trumpeter swans is consistent with proactive wildlife management.

The Rocky Mountain Population of trumpeter swans has been the subject of sustained restoration and translocation efforts spanning more than six decades, with Yellowstone National Park serving as a critical anchor for breeding birds in the Greater Yellowstone Ecosystem. Birds breeding within the Park and

surrounding wilderness depend on National Wildlife Refuge wetlands across the intermountain west for staging, foraging, and wintering habitat. The network of refuges that support Rocky Mountain Population birds includes Seedskadee NWR and Cokeville Meadows NWR in Wyoming, Grays Lake NWR and Bear Lake NWR in Idaho, Camas NWR in Idaho, Bear River Migratory Bird Refuge in Utah, and Red Rock Lakes NWR in Montana. Four of those refuges are directly included in this rulemaking. These refuges are not peripheral to Rocky Mountain Population recovery. They are part of the management landscape that allows core breeding populations to persist and expand. Lead restrictions on those refuges protect birds that move between protected breeding areas and managed public lands where hunting and fishing activities deposit lead in wetland sediments. This rulemaking weakens those protections without evaluating the consequences for a population whose recovery remains dependent on active management across a landscape that extends well beyond any single protected area.

In procedural matters, the proposed rule identifies at least 111 field stations as being opened or expanded, but the Federal Register notice itself does not provide a clear accounting that distinguishes new hunting and fishing openings from stations where existing lead restrictions are being reversed. A reader of the notice alone cannot determine which category applies to which station without reviewing each individual supporting document. Without that accounting in the notice, TTSS cannot readily evaluate the wildlife impacts of regulatory changes across the full scope of the rule.

The 2022 rulemaking stated that the Service would not open refuges to hunting and fishing with indefinite lead use. The proposed rule opens or expands hunting and fishing opportunities at stations across the Refuge and Hatchery Systems without lead restrictions and does not include a comparable commitment to phase out lead use. The published notice does not identify scientific information demonstrating that wildlife exposure risks have materially changed since those rulemakings were completed. If the Service intends to reverse those prior conclusions, it should clearly explain the scientific basis for doing so.

A related transparency concern involves stations where existing lead restrictions are already in effect. The Service Cumulative Impacts Report acknowledges that the rule reverses those restrictions at an additional 25 stations beyond the ten named rescissions. Those stations are not identified anywhere in the published notice or its supporting documents. TTSS cannot evaluate the wildlife impacts of lead restriction reversals at stations it cannot identify. TTSS requests that the final rule identify each of the 25 stations where existing lead restrictions are being reversed and the scientific or management basis for each reversal.

Recommendations

Non-toxic alternatives to lead ammunition and fishing tackle are widely available and operationally feasible at refuge scale. In most cases non-toxic ammunition alternatives are ballistically comparable to lead, and non-toxic fishing tackle performs similarly to lead-based options. The Service's own Cumulative Impacts Report acknowledges a voluntary lead-free program in which 13 refuges participated during the 2025–26 seasons. Consistent implementation of lead-free requirements would also create the

market opportunity to develop non-toxic alternatives, as the 1991 waterfowl shot ban demonstrated. Inconsistent lead requirements across units within individual refuges also create compliance problems for hunters who may inadvertently carry lead ammunition into restricted zones adjacent to areas where it is permitted. Because those alternatives exist, TTSS respectfully requests that the Service:

- Allow the lead-free ammunition and fishing tackle requirements finalized in 2022 and 2023 to take effect as scheduled on September 1, 2026. Any further review of those requirements should proceed through a separate rulemaking with full public notice and comment, not through blanket rescission in an annual station-specific regulations package.
- Explain the basis for abandoning the policy against indefinite lead use at newly opened or expanded hunting and fishing stations, and identify the scientific basis, if any, for concluding that wildlife exposure risks have been materially reduced since the 2022 and 2023 rulemakings.
- Clearly identify in the final rule which specific stations represent new openings or expansions of hunting and fishing opportunities, and separately identify each of the 25 stations where existing lead restrictions are being reversed with the scientific or management basis for each reversal.
- Retain the lead fishing tackle restrictions at the Chesapeake Marshlands Complex refuges in Maryland and conduct site-specific analysis before rescinding those protections. Fulfill the commitment to develop a hunting lead-free requirement at Canaan Valley NWR in West Virginia consistent with the prior analysis supporting its necessity.
- Retain the lead-free ammunition requirements at all ten affected refuges pending site-specific evaluation of wildlife exposure risks, including species-specific analysis of lead exposure impacts to trumpeter and tundra swans at refuges within their confirmed range. Where the Service determines that a proposed activity poses no credible lead exposure pathway for swans, that determination and its basis should be stated in the record. TTSS found no such analysis or explanation in the station-level documents reviewed.
- Require non-toxic ammunition and fishing tackle at stations within confirmed trumpeter and tundra swan range where this rule opens or expands hunting and fishing, including Grays Lake NWR in Idaho, Lower Klamath NWR and Upper Klamath NWR in California and Oregon, and the Chesapeake Marshlands Complex refuges in Maryland. TTSS's concern for lead impacts extends beyond swans, consistent with the 2021 Board policy recognizing lead as a significant threat to all wildlife, and we encourage the Service to consider that broader context in evaluating the cumulative impacts of this rulemaking.

TTSS appreciates the opportunity to comment and is available to provide additional technical information regarding the lead poisoning research and swan health issues discussed in these comments.

Respectfully submitted,

A handwritten signature in black ink that reads "Jeff Nelson". The signature is written in a cursive, slightly slanted style.

Jeff Nelson, President

The Trumpeter Swan Society

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THE TRUMPETER SWAN SOCIETY

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ATTACHMENT A

Comments of the Trumpeter Swan Society on Docket No. FWS-HQ-NWRS-2026-1223

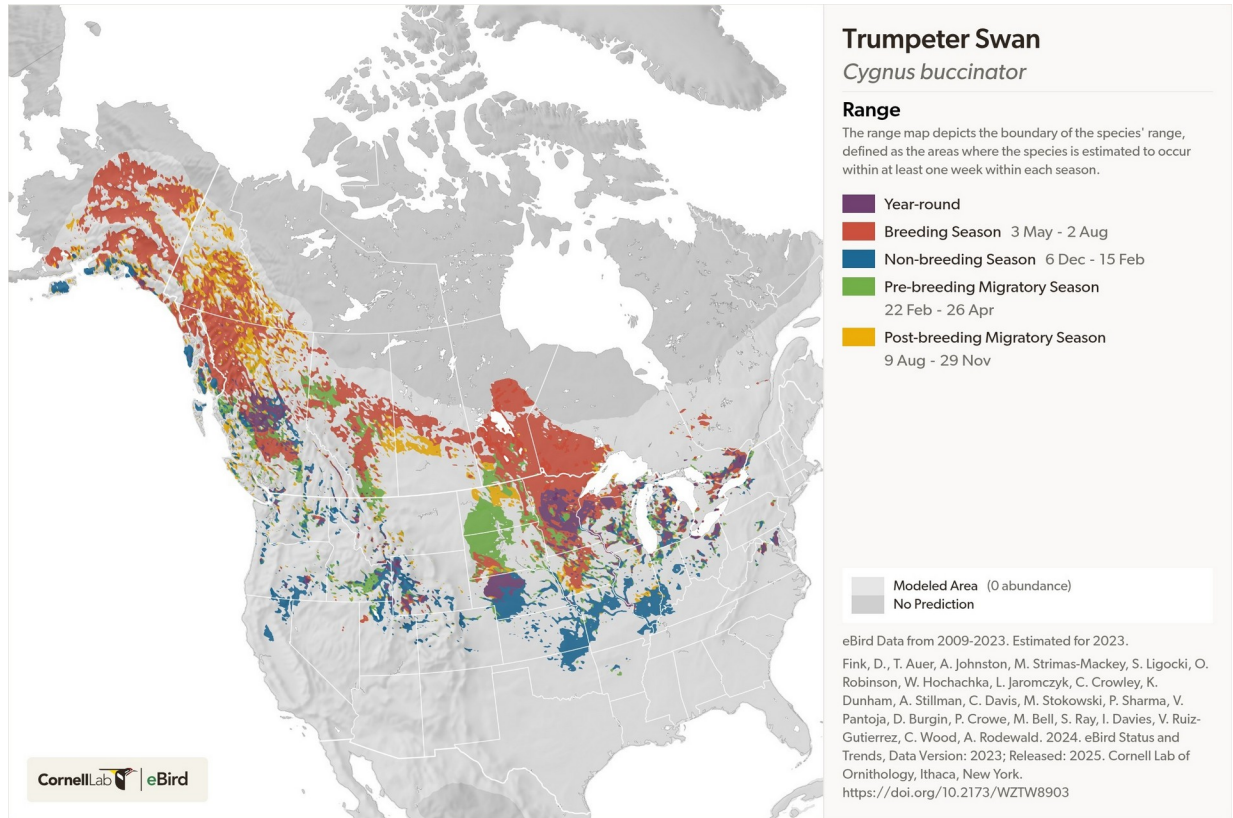


Figure 1. Seasonal range of trumpeter swans (*Cygnus buccinator*) in North America, based on eBird Status and Trends data 2009–2023, estimated for 2023. Interior Population birds winter across the upper Midwest and upper Mississippi Flyway states and use the prairie pothole region, Missouri River valley, and Great Plains corridor during migration. These regions encompass National Wildlife Refuge stations proposed to be opened or expanded to hunting and fishing in the proposed 2026–2027 rule. Mid-Atlantic presence during non-breeding and migratory seasons reflects the expanding Interior Population range and the growing importance of Atlantic Flyway refuges, including Eastern Neck and Blackwater NWRs, to trumpeter swan conservation.

Source: Fink, D., T. Auer, A. Johnston, M. Strimas-Mackey, S. Ligocki, O. Robinson, W. Hochachka, L. Jaromczyk, C. Crowley, K. Dunham, A. Stillman, C. Davis, M. Stokowski, P. Sharma, V. Pantoja, D. Burgin, P. Crowe, M. Bell, S. Ray, I. Davies, V. Ruiz-Gutierrez, C. Wood, and A. Rodewald. 2024. eBird Status and Trends, Data Version: 2023; Released: 2025. Cornell Lab of Ornithology, Ithaca, New York.
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