

STATE OF ALASKA

SARAH PALIN, Governor

ANILCA IMPLEMENTATION PROGRAM

550 W. 7TH AVENUE, SUITE 705
ANCHORAGE, ALASKA 99501
PH: (907) 269-7529 / FAX: (907) 269-3981
susan_magee@dnr.state.ak.us

February 28, 2007

Rob Campellone
Planning Team Leader
U.S. Fish & Wildlife Service
Division of Planning & Policy
1011 East Tudor Road., MS-231
Anchorage, AK 99503

Dear Mr. Campellone:

The State of Alaska reviewed the December 2006 Scoping Newsletter for the Innoko National Wildlife Refuge Comprehensive Conservation Plan (CCP). The following comments represent the consolidated views of the State's resource agencies. Many of our comments address state issues or interests identified previously as generally applicable to refuges in Alaska with light public use. We would also like to acknowledge the good working relationship between state and local refuge staff and we look forward to working with the refuge in the development of this plan.

General Management Trend

Given the relatively low level of commercial and non-commercial use of the Innoko Refuge and the apparent lack of natural resources issues, a substantial direction change from the current CCP does not seem warranted, unless new issues arise during the planning process. The close alignment of refuge management plans and goals with state goals and objectives relative to fish and wildlife management should be sought whenever possible. Management that maintains the integrity of refuge habitat and fish and wildlife resources, and allows for reasonable and responsible public use and access is in the best interest of both the Service and the State.

Application of General Management Policies and Guidelines

We anticipate the Service's recently completed General Management Policies and Guidelines that address common issues of statewide significance for other refuges in Alaska will be incorporated into the revised Innoko CCP. This guidance is a significant improvement over the guidelines used in the 1987 CCP. We understand that, in some instances, it may be necessary to tailor these guidelines to meet the needs of individual refuges, although at this time we do not see a need to do so for the Innoko Refuge. If the scoping phase raises any issues that might lead to a proposed variation in regional direction, we request a consultation opportunity to learn more.

Public Use Management Actions

The 1987 CCP did not prescribe limits on public use and access management above and beyond the General Management Policies and Guidelines. Since the current and projected level of public use in Innoko continues to be light, we do not see a need for alternatives that restrict the number of commercial or non-commercial visits to the refuge. We also request the CCP consider how commercial use stipulations or compatibility determination conditions could affect the public's ability to use Service administered uplands. The State recommends limiting stipulations to the minimum necessary to manage use and protect resources.

Available Data and New Research

Common to many issues is the need for adequate data to support sound decision-making. The State is interested in the type, source, and scope of the data that will provide the basis of management actions in the revised CCP. Our interest is especially keen when management actions need to take overlapping state and federal authorities into consideration. When new research is undertaken or developed by the refuge to assist with management decisions, we request early consultation in the objectives, design and conduct of studies. Our experience has shown that controversial issues can often be resolved with the collection and application of objective, defensible data, and the State desires to be a partner wherever possible.

Studies for Traditional Access

We encourage the Innoko Refuge to participate with the State in a cooperative effort to document traditional (pre-ANILCA) access and activities (towards implementing ANILCA Sections 811 and 1110(a)). This information is important for evaluating current and future management of access within the Innoko Refuge.

Wood Bison Re-introduction

For several years the Alaska Department of Fish and Game (ADF&G) has been pursuing the possibility of restoring wood bison in Alaska. Lands south of the Innoko Refuge are being considered as one potential site for wood bison restoration, although restoration efforts in two other areas of the state are likely to be pursued first. If a restoration effort does occur south of the refuge, it is possible or likely that wood bison would occur on the refuge at some time in the future. ADF&G would appreciate and looks forward to cooperating with the Service on any resulting issues.

Draft Goals

Overall, the draft goals listed in the December newsletter seem appropriate for expected refuge use and provide adequate management direction for the future, with one exception. The goal to maintain healthy populations of "indigenous" fish and wildlife in their natural diversity differs from the purposes of the refuge under ANILCA and the intent of the Refuge Improvement Act. Service policy provides ample direction concerning species management, introductions and re-introductions, making it unnecessary to add such specificity to this goal. We request the term "indigenous" be removed.

ANCSA 17(b) Easements and RS 2477 Routes

For 17(b) easements managed by the Service for access to the refuge, we request the CCP consider and recommend implementation measures to mark, sign and/or maintain some or all of the easements.

The 17(b) easement maps found on the State Department of Natural Resources website are updated biannually with assistance from BLM. The maps are located at: http://www.dnr.state.ak.us/mlw/trails/17b/easement_maps.htm. Information about allowed uses on 17(b) trails and site easements is located at: <http://www.dnr.state.ak.us/mlw/trails/17b/index.htm>.

We will also review our RS 2477 case files to determine if any additional rights-of-way within the Innoko Refuge have been asserted by the State since the 1987 CCP.

State Area Plans

For reference purposes, the 1988 Kuskokwim Area Plan, which contains management policies for state lands adjacent to the Refuge, is located on line at: <http://www.dnr.state.ak.us/mlw/planning/areaplans/kuskokwim/index.cfm>. The state lands in the Yukon-Koyukuk area, which surrounds the Innoko Refuge, do not have a formal plan, nor is one scheduled for preparation; therefore general state management guidelines are applicable to state lands located in on near the Refuge, including the beds of navigable waterbodies.

Commercial Guide Registration

We request the plan reference the requirement for commercial day use guides utilizing state lands and waters within the refuge to register with the Alaska Department of Natural Resources at <http://www.dnr.state.ak.us/mlw/commrec> (11 AAC 96.018 and 96.250).

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator