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August 9, 1994

Paul Guraedy
Superintendent
Yukon-Charley Rivers National Preserve
P O Box 167
Eagle, Alaska 99738

Dear Mr. *Paul* Guraedy:

As we anticipated in our June 17 comments on the final draft of the Yukon-Charley Rivers Resource Management Plan, additional comments have come in from the Fairbanks office of the Alaska Department of Fish and Game. Rather than re-drafting these comments, they are enclosed in their original format. Please consider them supplemental to the State's June 17 letter.

As the comments indicate, the reviewer does not have problems with the project statements in the RMP, but raises some important points which must be considered as these projects evolve from preliminary suggestions to on-the-ground research. The memo makes a compelling case for the value and necessity of timely, on-going cooperation between the National Park Service and the Department of Fish and Game.

Thank you again for your interest in and willingness to work with the State in the formulation of the RMP. If this approach is carried forward during implementation, I'm confident that both the process and results will be mutually acceptable.

Sincerely,

Sally Gibert
Sally Gibert
State CSU Coordinator

cc:
Gary Vequist, NPS Regional Office
Tina Cunning, DFG ANILCA Program Coordinator

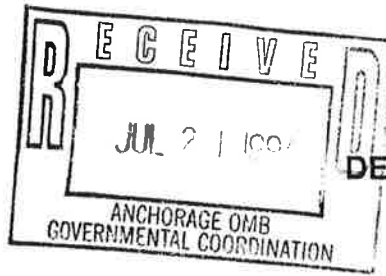
Distribution List

YUKON - CHARLEY RMP, SUPPLEMENTAL

August 10, 1994

Tina Cunning	Department of Fish & Game, Anchorage
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MEMORANDUM



STATE OF ALASKA
DEPARTMENT OF FISH AND GAME


TO: Tina Cunning
ANILCA Coordinator
Anchorage

DATE: July 6, 1994

FILE NO.:

THRU:

TELEPHONE: 456-5156

FROM: 
Mark McNay
Furbearer Biologist
Division of Wildlife Conservation
Fairbanks

SUBJECT: Comments on Yukon-
Charley Research
Proposals

I reviewed the following natural resource project statements from the Yukon-Charley Resource Management Plan (RMP):

- 1) YUCH-N-014.0 Assess Furbearer Populations and Harvest.
- 2) YUCH-N-014.1 Determine Population Dynamics of Harvested Marten.
- 3) YUCH-N-014.2 Determine Ecology and Demography of a Low Density Wolf Population.
- 4) YUCH-N-023.1 Assess the Impact of Beaver on the Natural Reclamation of Placer Mine Tailings.

My comments on these project statements and NPS/ADF&G project cooperation in general are given below.

It is my understanding that the project statements are intended to be somewhat generalized descriptions of potential management/research projects that may be undertaken by the Park Unit. Although the statements are detailed enough to give the reader an idea of the project objectives and expected results and may satisfy the requirements of the RMP, they are not sufficiently detailed to serve as project work plans or proposals. Nevertheless, it is apparent that the project statement sometimes represents the only and entire project planning documentation.

In some cases wording within project statements appears to overstate the justification, often in the absence of a literature review that would provide an independent evaluation. For example, in project YUCH-N-014.2 titled Determine Ecology and Demography of a Low Density Wolf Population, the author states, "Very little is known about the wolf population in the

Preserve... The situation, however, may be particularly dynamic at this time and in the near future... Caribou use has increased dramatically during recent winters... Current theory suggests a dramatic and immediate numerical response of wolves... The degree to which wolves respond and the mechanisms by which they respond are critical to understanding wolf/prey dynamics in North America." In this case, a more detailed proposal citing the recent work in Denali National Park and the work published by Gasaway et al in recent wildlife monograph, would be helpful in evaluating this project. This project (YUCH-N-014.2) is an ongoing project and a more detailed proposal may have been submitted with the original application for capture wolves. Again, my point here is that the project statements themselves need to be supported by a more rigorous proposals if and when the project is funded.

For those projects that require immobilization, marking, or restraint of animals, the National Park Service is required to obtain a permit from the Department. Before we issue that permit, it is our public responsibility to ensure that the methods used in handling those animals are consistent with accepted procedures, and that there is sufficient scientific or educational justification to require submitting the animals to the trauma associated with capture. In my opinion, the Natural Resource Project Statements found in the RMPs, in general, do not provide sufficient justification for issuance of such a permit.

I recommend that in those cases where the NPS is requesting a permit for handling animals in a RMP project, that a detailed proposal be submitted and reviewed by the Department. The proposal should include details related to capture including (1) description of drugs, traps, or other devices that will be used in the capture (2) the type of marking device used (3) proposed schedules for monitoring marked animals (4) description of methods and time schedule to be followed in removing the marks/radios at the end of the project if applicable and (5) an extensive literature review that provides the reviewer with sufficient background to evaluate the project's scientific or educational value in a context of similar investigations. In addition, the NPS needs to contact the local area biologist and ensure that radio frequencies used in the proposed project will not interfere with existing projects. Obviously, these discussions need to take place before the radios are purchased.

Some projects listed in the RMP will not be funded in any particular fiscal year. It is important that when projects are funded and particularly when animal captures are anticipated, the NPS work closely with the Department to ensure that proposal review and permit applications are completed well before the anticipated start of field work. In the recent case of project YUCH-N-023.1 titled, Assess the Impact of Beaver on the Natural Reclamation of Placer Mine Tailings, the application and project statement was submitted to the Department on 20 June with an anticipated field work starting date of 1 July. No additional

detailed proposal was submitted. The project called for implantation of radio transmitters in 15 live captured beavers, but did not specify the qualifications of those persons who would be doing the surgery to implant the radios (i.e. veterinarian, biologist with prior experience, etc.). I received a copy of the proposal on 29 June. Craig Gardner, the Area Biologist in Tok, did not have a chance to review or comments on the proposal, and did not have a copy. In addition, there was no apparent effort to coordinate the use of radio frequencies. Currently, there are radio collared wolves, marten, and caribou in GMU 20E. We do not know, at this time, if the transmitters implanted in the beaver will overlap any existing frequencies.

In making these comments, I do not intend to imply that any of the projects outlined in the current Yukon-Charley RMP project statements are inappropriate. Rather, I am suggesting that the NPS and the Department need to work together to ensure that projects are based on thoroughly considered work plans and proposals that stand up to scientific or public scrutiny.

cc: Reed
Taylor