

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

550 W. 7TH AVENUE, SUITE 705
ANCHORAGE, ALASKA 99501
PH: (907) 269-7529 / FAX: (907) 334-2509
susan.magee@alaska.gov

January 18, 2008

Tony Booth, Refuge Manager
Tetlin National Wildlife Refuge
P.O. Box 779
Tok, AK 99780-0779

Dear Mr. Booth:

The State reviewed the Draft Revised Comprehensive Conservation Plan (CCP) and Environmental Assessment (EA) for the Tetlin National Wildlife Refuge. These comments represent the consolidated views of the State's resource agencies.

We appreciate the overall level of coordination that occurred during this planning process. As a result, we have fewer substantive comments. However, we remain particularly concerned about the CCP's assertion, based on a decision in the Refuge's 1997 Public Use Management Plan (PUMP), that the refuge is closed to subsistence use of off-road vehicles (ORV). As noted in more detail below, we question both the basis for that earlier decision and the lack of refuge-specific regulations needed to implement such a closure under Section 811 of the Alaska National Interest Lands Conservation Act (ANILCA). We understand treatment of ORVs is also a regional issue that variously affects all refuges in Alaska. We request an opportunity to work with both the Refuge and the Region in an effort to resolve our long-standing concern over the right of rural residents to continue traditional use of ORVs for subsistence purposes, subject to reasonable regulation to protect refuge resources.

Our remaining comments on the Draft Revised CCP are primarily informative in nature and often request inclusion of additional information or clarification in the final plan or decision notice. They are organized into the following categories:

- Subsistence Access and Management
- Fisheries
- Fire Management
- State Lands and Waters within the Refuge
- Compatibility Determinations
- Additional Page-Specific

Subsistence Access and Management

Subsistence Use of Off-Road Vehicles

The Revised CCP indicates that a traditional use determination made as part of the 1997 Tetlin Refuge PUMP found that ORVs were not traditionally used for subsistence purposes on the Refuge (See 3-23, 3.2.10.1, Access for Subsistence Purposes). It appears the discussion of ORVs was based on reports written by the Alaska Department of Fish and Game (ADF&G) Division of Subsistence for Northway (1986) and Tetlin (1987), and on unidentified subsistence studies conducted prior to 1980. We acknowledge that riverboats, highway vehicles, and snowmachines are used most frequently, in part because of limitations imposed by the terrain. However, we continue to question the definitive assertion that ORVs have not been used at all for subsistence purposes and maintain our long held view that the Refuge must compile a larger-scope study of all pre-ANILCA activities and access to establish a strong foundation for any access regulations that may be needed. While we do not condone inappropriate or illegal use of ORVs, additional steps, including refuge-specific regulations, are needed to prohibit access allowed under ANILCA Section 811.

Page 2-58, Table, Off-road Vehicles, Action Alternative Column: ORVs are allowed for subsistence activities under ANILCA Section 811 (subject to reasonable regulation) or by special use permit in Minimal management areas. We suggest the language be changed to *“No routes or areas will be designated in Minimal management”* which is consistent with Chapter 3 and existing laws and regulations.

Page 4-36, 4.3.6, second sentence: Describing off-road vehicles as “not allowed” is inconsistent with both ANILCA and Service regulations. Off-road vehicles are allowed in designated routes and areas, and by special use permit per 43 CFR 36.11(g), or when used for subsistence purposes per 50 CFR 36.12 (see also Chapter 3, Sections 3.2.11.2 and 3.2.10.1). Until regulations are promulgated closing the Refuge to ORVs, it is inaccurate to simply indicate they are “not allowed” on the Refuge.

General Subsistence Management

Page 2-3, A.10 Objective: We would like to commend the Refuge for inclusion of this objective as well as the previous work concerning whitefish. Monitoring of whitefish stocks in the Refuge and in downstream waters provides information that will assist in the maintenance of this important subsistence resource for local area residents, particularly those in Tetlin and Northway. We also concur with the importance of Objective A.11; however, we request that “critical” be replaced with “important.”

Pages 2-16 to 2-17, Management Alternatives, Goal G, Objectives: Six objectives are presented to meet Goal G: *“Provide subsistence opportunities for rural residents, compatible with other refuge purposes.”* These are reasonable objectives that, in combination with objectives associated with fish and wildlife populations, are essential for accomplishing Goal G. We appreciate plans by the Refuge to work with ADF&G to address Objective G.4. However, potentially waiting up to 10 years to achieve Objectives G.4 and G.6 may be problematic, especially if construction begins within the

next few years on a natural gas pipeline following the Alaska Highway corridor. The Refuge will have an important opportunity to document subsistence activities before, during, and after this proposed construction project to evaluate the impacts of construction and operation. We therefore suggest moving up the timelines for addressing Objectives G.4 and G.6.

Page 3-22, 3.2.10, Subsistence Use Management: The first paragraph properly notes the role of the Federal Subsistence Board in regulating subsistence activities on the Refuge, but does not acknowledge that regulations implemented by the state regulatory boards continue to apply on the Refuge unless superseded by federal subsistence regulations. We request recognition of the State's continuing regulatory authorities (as stated on page B-1 in Appendix B) in the final paragraph in Section 5.1.1.2 on page 5-4.

Page 4-17, Section 4.2.6.1, Humpback Whitefish: The first paragraph references a 2007 report by Friend et al. If this is a draft report not yet available for examination, it should be listed as such on page I-7 in the References Cited Appendix. The first paragraph also presents whitefish harvest data from studies conducted in the 1980s with the addition of 2005-06 data. For comparison purposes, the 2005-06 data would be more useful if presented as average pounds per household. It is unclear why harvest data for whitefish are presented in this section but not for any other fish and wildlife species. Presentation of subsistence harvest data would be more appropriate in Section 4.3.7.

The second paragraph mentions local concerns about "*possible declines in humpback whitefish populations*" and a study that was instigated to address the matter. Many study outcomes are discussed *except* for results regarding real or perceived population declines. If this information is retained in the final plan, we suggest incorporating resolutions for these concerns or related conclusions found in the study.

Page 4-32, Table 4-2: As previously noted to the Planning Team, the 2000 population statistics for Dot Lake appear to exclude data for Dot Lake Village. The Alaska Community Database Community Information Summaries contain census data for both Dot Lake and Dot Lake Village. This database is available on line and contains 2006 community population estimates that could be presented in this table. At a minimum, the Dot Lake population data should be corrected.

Page 4-38, 4.3.7, Affected Environment, Subsistence: The ADF&G Division of Subsistence recently conducted harvest surveys in refuge-area communities covering the period April 2004 – March 2005. Our previous communications with the Planning Team noted that more current harvest data for refuge area communities is available in a Division of Subsistence report prepared for the Department of Natural Resources (DNR); however, it appears the Refuge either did not obtain a copy of this report or chose not to present these more current data. The data from this study are now being summarized in more detail in a report now in preparation. For more information about this study, contact the Division of Subsistence Regional Program Manager, Jim Simon, in Fairbanks at 459-7317.

Page 5-3, 5.1.1.2, Subsistence: We request the discussion include recognition of state management authorities for fish and wildlife, including that harvest of fish and wildlife within the Refuge is regulated by the State unless superseded by federal subsistence regulations. See also comment for page 3-22.

Page 5-17, Section 5.2.3.3, Impacts to the Human Environment: Subsistence Opportunity: The second paragraph states that,

Access and opportunities for public use will continue to expand under all alternatives. The resulting increase in use will create some competition between local rural subsistence users and non-local recreational users under all alternatives... most impacts will occur during brief periods in spring and fall when subsistence activities and recreational uses overlap.

We appreciate acknowledgement of the Refuge's responsibility to mitigate potential impacts of increasing non-subsistence uses on subsistence users. We are concerned, however, that more restrictive hunting regulations would be one potential mitigation measure to address increased harvest levels that might result from improved access (see Section 5.5.2.3, pages 5-38 to 5-39). In essence, the Refuge might first improve access that attracts more recreational users and then be compelled to seek more restrictive regulations to reduce hunting opportunity by non-federally qualified subsistence users. An alternative approach would be to focus on access improvements that are less likely to generate user group conflicts. We strongly encourage addressing this concern in consultation with local residents and other management agencies such as ADF&G or DNR.

Page 5-44 to 5-45, Section 5.9, Section 810 Evaluation: The possible conflicts noted in the discussion of the Preferred Alternative and their potential effects on subsistence users seem to contradict conclusions made in the Section 810 evaluation. For example, the table on page 5-47 suggests that increased boat, trail, and highway site access will have a moderate, long-term local "positive" effect on subsistence opportunity, while in Section 5.2.3.3 expanded access is projected to "create some competition between local rural subsistence users and non-local recreational users under all alternatives." Discussion of the Preferred Alternative in Section 5.4.2.3 appropriately indicates plans by the Refuge to conduct public education and outreach activities to mitigate such impacts.

Fisheries

We understand the position of the Service concerning the stocking of rainbow trout into Hidden Lake in the Preferred Alternative. We would appreciate future opportunities to work with the Service on the potential for fisheries enhancement projects on appropriate waters within the Refuge. We are particularly interested in working with the Service in providing priority public uses of the Refuge, including opportunities for fishing. Enhancement projects such as the one at Hidden Lake provide increased opportunities for the public and have the additional benefit of reducing pressure on wild stocks of fish within the region, which could become greater if use on the road system increases. The

ability of the State to enter into additional stocking programs will increase as the new hatchery in Fairbanks becomes operative in 2009 or 2010. It may be appropriate to utilize the revision of the Refuge Fishery Management Plan, following the completion of the CCP, to develop long range goals for potential fisheries enhancement projects. We look forward to working with the Refuge on the revision of that plan.

Fire Management

Our overarching comment regarding the management of fire within the Refuge relates to how it is addressed within the context of the CCP process. We understand that wildland fire management planning and CCPs are two separate processes. While it is entirely appropriate to outline general wildland fire management direction in the CCP, as is done in Goal E, the CCP should clarify that detailed specifics are actually left to annual reviews of fire management conducted by the Refuge and sent to the Alaska Wildland Fire Coordinating Group (AWFCG) for implementation. We appreciate the Refuge's intent to provide the most detailed information concerning wildland fire management for reviewers, particularly in the areas adjacent to human habitation. At the same time, the CCP should clarify that policies and techniques concerning fire may change over time and may eventually amend the direction of the CCP. The details and implementation of fire management are best described and implemented through the Refuge Fire Management Plan. As an adjacent land manager with inholdings in the Refuge and with management responsibilities for fish and wildlife that overlay the Refuge, the State appreciates opportunities to work with the Refuge on the details concerning wildland fire management. Additional page-specific comments related to fire management follow.

Page 2-12, Goal E: We recommend that Goal E more clearly state the intent of the Refuge concerning fire management: that the boreal forest is fire dependent/fire adapted and that fires will be allowed to burn on the landscape to the extent practicable. Our recommended rewording is:

Given that productivity and diversity of the flora and fauna in the boreal forest depends in large part on recurring wildland fire, allow fire on the landscape to the extent possible while protecting human life, property and cultural resources.

Page 2-13, E.6, Objective: Regarding: "...and submit necessary change recommendations to the AWFCG." We recommend rephrasing this sentence consistent with the following information derived from the Alaska Interagency Wildland Fire Management Plan (AIWFMP): "The land manager/owner(s) determines the fire management option for the lands under their jurisdiction or ownership" (AIWFMP, pg. 38). The fire management options that the Refuge selects for its lands are not recommendations nor are they sent to the AWFCG. The Refuge is expected to inform and involve its neighbors during the annual review but the final decision rests with the Refuge. Once approved the changes are submitted to the Alaska Incident Coordination Center for inclusion in the statewide map atlas (ref.: AIWFMP 2005 Revision to Management Option Boundary or Management Level Change Procedures. 2005 Alaska Wildland Fire Coordinating Group).

Page 2-37, 2.5.2.4, Habitat Management: For clarification we request that this sentence be revised as follows so that the use of quotation marks around “*improve*” are not necessary:

Prescribed fire would be applied to approximately 400 acres annually to improve habitat for wildlife needing earlier seral vegetation, such as waterfowl and moose.

Page 2-39, 2.6.1, second bullet and page 2-41, 2.6.2.3 Fire Management: We agree that shifting to a Fire Use strategy will be an improvement over the current situation, especially since federal policy now allows active management of a wildland fire instead of just allowing it to spread naturally. Aerial ignition can now be used to extend a fire to burn out hazardous fuels to enhance future protection of human values and increase future opportunities to manage wildland fire on areas adjacent to human values needing protection.

Page 2-43, Figure 2-3: The fire management discussion for Alternative B (Page 2-41, 2.6.2.3) indicates the emphasis will shift away from suppression and landscape-scale prescribed burning to wildland fire use and fuels reduction treatments. However, the map for Alternative B appears to instead increase the area designated for the Full Fire Management Option, notably in the eastern portion of the Refuge south of the Alaska Highway (the current plan has the lands designated as Modified). Please address the apparent discrepancy in the final plan.

Page 2-48, 2.7.2.3, General Fire: Although referenced in Table 2-8, the narrative description of Alternative B does not specifically mention the fire dispatch system. It is unclear why the descriptions for the two alternatives are so different when Alternative C’s narrative begins with “*As under Alternative B...*” implying they are the same. If there is in fact a difference between the two Alternatives, we request that be clarified in the final plan. Otherwise, we recommend the two sections read the same.

Additionally, the fire terminology used in this section is incorrect. “Full Suppression Option”, “Modified Suppression Option”, and “Limited Suppression Option” should be changed to “Full Management Option”, “Modified Management Option”, and “Limited Suppression Option” respectively, per the AIWFMP. These may need to be changed elsewhere in the document and we recommend conducting a word search.

Page 2-51, 2.7.2.3 (cont.), first full paragraph on the page: Alternatives A and B are feasible under current Division of Forestry staffing levels; however, the State would need to increase its staffing and available funding for the area to accommodate Alternative C. This would constitute a change between Alternatives B and C, which should be clarified in this paragraph. Regarding cooperation, we look forward to working with the Service on increasing suppression capabilities and response times in the context of the Fire Management Plan revision.

State Lands and Waters within the Refuge

Page 4-2, Table 4-1: We understand that estimating acreage for submerged lands is complex, and appreciate their inclusion in the table. If this figure is retained in the final plan, or used in subsequent step-down plans, we request the following language be added to the footnote:

The State of Alaska received title to the beds of navigable waters at statehood, which may affect some or all of the submerged lands acreage. Any lake smaller than 50 acres which is part of a navigable system, may have transferred to the State of Alaska under the Equal Footing Doctrine.

Page 4-2, 4.1.1, first full paragraph on page: The Submerged Lands Act of 1953 is another fundamental piece of legislation affecting land ownership within the Refuge. Please include this reference in the final plan.

Page 4-2, 4.1.1, last paragraph on page and Figure 4-1: The State of Alaska received title to the submerged lands under navigable waters at statehood. Within the Tetlin Refuge these have not been specifically identified and may include some, or all of the acreage listed under the Submerged Lands category of Table 4-1, and may also include some of the acreage of water bodies smaller than 50 acres if any are an integral part of a navigable system. We recognize that the plan identifies title as a time-specific estimate (September 2005 for Table 4-1 and May 2007 for Figure 4-1); however, the section does not include language that identifies these essential land status considerations. We request that the final plan clarify these points.

Page B-2, 1.2, first paragraph, fourth sentence: If retained in the final plan, we request the following revision to this sentence: “*The State owns approximately 46,000 **upland** acres within the Tetlin Refuge boundaries, **has** selected an additional 750 acres, **and owns an as yet undetermined quantity of the submerged land acreage.**” These revisions are significant in light of the remainder of the paragraph that also addresses navigable waters and state-ownership of submerged lands.*

Appendix D: We request the following changes to the first sentence in the second paragraph under RS2477 Rights-of-Way:

*The State of Alaska has **currently** identified seven specific routes (see Table D-1) that it believes may be claimed on Tetlin Refuge under Revised Statute 2477 (AS 19.30.400).*

We also recommend including a clarification about the technical term “*highway*” since it is at least as likely that any given RS 2477 route would be developed by the State as a trail instead of a road. Specifically, we request inclusion of the following sentence that BLM uses in its plans when discussing RS 2477 rights-of-way: “‘*Highways*’ under state

law include roads, trails, paths and other common routes open to the public.” We recently recommended an approach to address RS 2477 rights-of-way for all CCPs.

Page D-2, Table D-1 and Figure D-1: Our records indicate the mileage totals for the routes listed in the table are as follows:

RST 321: ~59 miles

RST 374: ~45 miles (The initial portion of this route duplicates RST #439)

RST 1586: ~5 miles

RST 1588: ~32.04 miles (same)

RST 1589: ~9 miles

RST 1590: ~4.5 miles

RST 1591: ~1.5 miles

RS 2477 route lengths are estimates since very few throughout the State have been surveyed. Unless a route has been surveyed and adjudicated, we request these figures be listed as approximations.

We also request Figure D-1 include RST 1589, “Paradise Hill-Cabin.” Our files indicate this route is located in the Nabesna D-1 Quadrangle; originating off the Alaska Highway 1 mile south of Paradise Hill, running east 1.5 miles, and then northeast 7.5 miles before terminating at a cabin on an unnamed lake. A map of all area routes is available and can be provided upon request.

Page D-3, Figure D-1: EIN 105 is not on the map. Our files show that the easement is scheduled to be included when the land goes to patent. USGS Quad maps (Tanacross A-3) also show an easement 2 C5, in Section 36, Township 16N, Range 17E, and Section 6, Township 15N, Range 16E. We understand this easement may no longer be on Native selected land, which would explain why it is not included. However, if that is not the case, we request it be added to the map.

Compatibility Determinations

Page E-4 Commercial Air Transporters, Stipulations Necessary to Ensure Compatibility, #14; and Page E-13 Commercial Hunting (Guiding and Outfitting), Stipulations Necessary to Ensure Compatibility, #26:

Stipulations that “prohibit” an activity are typically supported by statute or Service regulations. However, in this instance there are exceptions built into 43 CFR 36.11(f)(4) that would make it possible to authorize helicopters on a case-by-case basis, as appropriate. We recommend this stipulation be changed as follows: *“Helicopter landings are not authorized by this permit.”*

Page E-8, third full paragraph on page, first sentence: Commercial operators, such as air taxis, hunting and fishing guides, who utilize state lands within the Refuge, including shorelands and waters, are also required to register with the Department of Natural Resources (11AAC 96.018 and 96.250). We understand that this is not a necessary component from a refuge management perspective, but request that it be included when other state requirements are described.

E-10, Commercial Hunting Services CD, fourth full paragraph, last sentence: Contrary to this statement, according to 50 CFR 36.33(e), commercial cabins are allowed by special use permit, except in designated Wilderness.

Page E-17, Stipulations Necessary to Ensure Compatibility, third paragraph, second sentence: As a result of overlapping jurisdictional authorities, we expect this decision will be made in cooperation with ADF&G.

Page E-22, Description of Use, second paragraph, second sentence;

Page E-23, Stipulations Necessary to Ensure Compatibility, first paragraph, second sentence;

Page E-38, Description of Use, second full paragraph on page, second sentence;

Page E-39, Description of Use, first paragraph on page, last sentence:

We request that “*sport*” not be used to describe general hunting. This term is no longer used in ADF&G regulations and has developed a negative connotation over time. (Use of the term sport fishing, however, is not problematic.)

Page E-23, Description of Use, second paragraph on page, first sentence: We recommend the Refuge avoid using the term “*significant*,” particularly in this instance. The term has legal implications in the context of this document that have not been thoroughly analyzed. We suggest the final determination include the following change, or similar: “*Impacts to resources would...*”

Page E-29, Stipulations Necessary to Ensure Compatibility, #7: Considering that this determination encompasses research performed on archaeological and cultural resources, we question the definitive nature of this stipulation. We suggest the Refuge consider adding “*...unless specifically authorized in this permit.*”

E-37 to E-42, Compatibility Determination for Subsistence Uses: The second full paragraph on page E-38 contains an incomplete and not entirely accurate description of how subsistence hunting and fishing are regulated on the Refuge. We recommend replacing the second, third, and fourth sentences with the following:

Subsistence hunting and fishing activities are managed by state and federal regulations. State regulations apply on refuge lands unless superseded by federal subsistence regulations. The federal regulations generally offer qualified subsistence users longer and more liberal seasons, bag limits, and methods and means of harvesting resources than those allowed in the state regulations. Eligibility to harvest resources on the Refuge for subsistence uses

under the federal regulations is determined by the Federal Subsistence Board and the Alaska Migratory Bird Co-management Council on a geographical or community basis, rather than an individual basis. All residents of rural communities or areas that have been determined to have a history of customary and traditional use of fish and wildlife resources in the Refuge are eligible to participate in subsistence uses of those resources on the Refuge under the federal regulations....

Page E-44, Description of Use, third paragraph on page: Trapping is a public use that is not classified under federal or state law as commercial, subsistence, or recreational. It is simply “trapping.”

General - Stipulations Necessary to Ensure Compatibility

We request the Refuge consider using the phrases “*not allowed*” or “*not authorized*” in place of “*prohibited*”, where appropriate. Stating that a prohibition exists may imply that there are regulations in place that make all forms of these activities or facilities illegal, which is not always the case.

Regional Stipulations Necessary to Ensure Compatibility

We understand the following two compatibility stipulations (bullets) are also regional permit conditions. We have brought them and others to the attention of the Region to address in a region-wide review of permit stipulations. We provide our comments concerning these stipulations here for your information within the context of this review.

Page E-11, Stipulations Necessary to Ensure Compatibility, #7:

- *“The permittee shall notify the refuge manager during refuge working hours in person or by telephone before beginning and upon completion of annual activities allowed by this permit.”*

It may be useful to incorporate a more specific timeframe in which notifications must occur.

Page E-12, Stipulations Necessary to Ensure Compatibility, #15, and
Page E-30, Stipulations Necessary to Ensure Compatibility, #10:

- *“Use of off road vehicles (except snowmachines) is prohibited except in designated areas.”*

50 CFR 36.2 specifically excludes snowmachines from the definition of ORVs. Including “*except snowmachines*” in this stipulation inaccurately implies snowmachines are ORVs. We request the phrase in parentheses be removed and if necessary, snowmachine use be addressed by separate stipulation(s).

Additional Page-Specific Comments

Page 1-6, 1.3.3, second paragraph, second sentence: We request this sentence include reference to the Boards of Fisheries and Game as additional bodies that govern regulations related to harvest in the Refuge.

Page 1-6, 1.3.3, second paragraph, last sentence: Because management objectives encompass more than just “big game” we request that “wildlife” be used in place of “big game.”

Page 1-10, 1.6.3, entire paragraph: The word “rare” is sometimes confused with endangered or threatened species. Since the species referenced in this paragraph are not listed as such, we recommend replacing “rare” with “uncommon.” This comment is also applicable to 4.2.7, first paragraph, second sentence.

Page 2-1, 2.1, Vision, Goals and Objectives: We request the following paragraph from the Kanuti NWR Draft Revised CCP, page 2-27, 2.9 Refuge Goals and Objectives also be inserted here.

“Cooperation with State and Federal agencies and other organizations is a critical component to successfully meeting most of the objectives listed below. This cooperation can take a variety of forms, ranging from reviewing and revising study plans and reports to cooperating on data collection and report completion.”

Page 2-2, A.4, Objective: We recommend using “important” rather than “critical” to describe moose habitat.

Page 2-3, A.7, Rationale: Since bears roam in and out of the Refuge we recommend replacing the first sentence as follows: *“Additional information is needed concerning area bear populations that utilize the Refuge.”* This comment is also applicable to Objective A.8 concerning furbearers. Objective A.17, which addresses Dall sheep populations, provides a good description of a wildlife population that resides within several different land management units and is managed under differing authorities.

Page 2-8, B.9 Rationale: We encourage the Refuge to update relevant literature prior to any planning and implementation of the proposed study. The references used to describe this objective are significantly dated. Major changes in both study methodology and vehicle technology separate snowmachine use in the 1970s from that which occurs today. We also request this section note that current snowmachine use is not believed to be substantial enough to cause significant impacts. In addition, the rationale refers to “critical” habitat. Unless critical habitat has been identified pursuant to the Endangered Species Act, we request replacing the term “critical” with “important.”

Page 2-15, F.4, Rationale: In recognition of differing management authorities over habitat and wildlife, we request *“and others responsible for management of habitat and wildlife”* be added following *“the Refuge”* in the last sentence.

Page 2-17, G.4, Objective: We suggest clarifying that this objective concerns a valid household survey.

Page 2-18, H.4, Rationale: The fifth sentence refers to “*non-renewable resource extraction.*” The objective needs to clarify whether any extraction is occurring on the Refuge at the present time. If not, we request the sentence be modified with “*could include*” to clarify that the sources noted are examples.

Page 2-27, 2.3.2: Consistent with the Record of Decision for the 1987 Tetlin CCP, as well as the approach taken in other CCPs currently under revision, we request this section clarify that no lands were recommended for designation during the previous wilderness review.

Page 2-41, 2.6.2.2: We concur with and encourage Plan direction to modify the Chisana River boat launch in order to assure reliable access for boaters.

Page 3-30, Sand, Gravel, and Other Common Variety (Saleable) Minerals, last sentence: Contrary to Regional Management Policies and Guidelines, this use is not allowed in Moderate management, however, no explanation has been provided in this chapter or elsewhere in the plan. Please include rationale for this refuge-specific variation in the final plan.

Page 3-41, Off-Road Vehicles (All-Terrain Vehicles): While taking into account the relevant justification provided in the narrative (3.2.11.2), stating that airboats and air cushion vehicles are “*not allowed*” is not entirely consistent with 43 CFR 36.11(g), which allows ORVs on designated routes and areas or by special use permit. We understand that the Refuge has chosen not to designate areas on the Tetlin Refuge for these vehicles, however, that is still consistent with standard direction in the Regional Management Policies and Guidelines Table, which states: “*may be allowed, consistent with section 3.2.11.2.*” We request the standard language be reinstated or, alternatively, replaced with the following: “*May be allowed; no routes will be designated for airboats or air cushion vehicles*” or “*May be allowed; consistent with section 3.2.11.2.*”

Page 4-43, 4.3.8.1, first paragraph, first sentence: We recommend the final plan recognize that the Tetlin Refuge opted to use the term “*recreational*” when describing users who are not federally qualified subsistence users, even though their activities may not be what is commonly accepted as “recreation.” Since the State considers all Alaska residents may potentially qualify for specific subsistence hunts, the term becomes particularly problematic when the discussion continues on page 4-44 and describes hunters from “*Fairbanks and Anchorage*” as recreational hunters. If possible, please revise this discussion to avoid confusion. If it becomes too difficult to address this comment in this context, at a minimum we request a clarification that not all non-federally qualified subsistence hunters are in fact engaged solely in “recreation.” This comment also applies to 4.3.8.2 on page 4-44 and all other such references throughout the plan.

Page 4-43, 4.3.8.1, third paragraph, first sentence: To clarify the calculation of the harvest of moose in the area, we request that the sentence be extended to note, “...is unknown because the Refuge does not constitute a unique management area for record keeping purposes as tracked by ADF&G.”

Page 4-46, 4.3.9.1, second sentence: Please add the following to the beginning of the second sentence: “*Trapping is a public use that is not classified as commercial, subsistence or recreation, however...*”

Page 4-48, Outstanding Opportunities for a Primitive and Unconfined Type of Recreation: The first sentence implies that motorized activity is, or should be, prohibited in designated wilderness. We recognize this is not the Service’s intent. Since similar language appears in most CCPs, we are working with the regional planning staff to refine this section and suggest the following revision:

Primitive and unconfined recreation occurs in an undeveloped setting and is relatively free from social or managerial controls. Primitive recreation is characterized by experiential dimensions such as challenge, risk, and self-reliance, and includes opportunities for non-motorized, non-mechanized travel. Dispersed use patterns, which frequently occur where there are no facilities to concentrate use, enhance opportunities for self-reliance and also enhance opportunities for solitude....

Page 4-48, Other Special Features, second paragraph, last sentence, and 4.4.1, first sentence: Consistent with the Record of Decision for the 1987 Tetlin CCP, we request language be included or referenced that clarifies that these units were not recommended for designation in the previous wilderness review for not meeting the criteria for “outstanding wilderness values.” Although these statements are correct, the reader may not have access to the existing management plan and may be confused as to why these units are not designated or proposed for designation.

Page 5-2, third bulleted list and page 5-17, 5.2.3.3, second paragraph, third sentence: See above comments for page 4-43, 4.3.8.1 regarding the qualifier “recreational.”

Page 5-27, 5.4.1.7, Mammal Populations, first paragraph: We request that the paragraph also note that in high snowfall years compacted snowmachine trails can facilitate the ability of moose to move into additional browse areas.

Page 5-34, 5.4.2.7, Cumulative Effects: first paragraph, third sentence: We request that the adverse impacts be changed from “*substantial*” to “*moderate to major*” site specific long term impacts but regionally “*minor*.” “Substantial” is not defined and impacts will be greater at the local level but minor refuge-wide.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'M'.

Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator