

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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July 22, 2008

Bill Schaff, Refuge Manager
Innoko National Wildlife Refuge
P.O. Box 69
McGrath, AK 99627

Dear Mr. Schaff:

The State of Alaska reviewed the Draft Revised Comprehensive Conservation Plan (CCP) and Environmental Assessment (EA) for Innoko National Wildlife Refuge. The following represents 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 few substantive comments. Our primary comments relate to the characterization of the State's wood bison project and the portrayal of Refuge concerns regarding fisheries. The remaining comments are primarily informative in nature and often request inclusion of additional information or clarification in the final plan. Comments have been organized into the following categories:

- Wood Bison
- Fisheries Management
- Goals and Objectives
- Appendix C
- Management Policies and Guidelines
- Page-Specific Comments
- Compatibility Determinations

Wood Bison

The State has a high interest in restoring wood bison to Alaska. In preparation, the Alaska Department of Fish and Game (ADF&G) recently transported over 50 wood bison from Canada that are now undergoing a 2-year quarantine before release. Three wood bison restoration areas are currently under consideration: Yukon Flats, Minto Flats and the lower Innoko/Yukon River area. Due to logistic and cost considerations, wood bison restoration in each area would initially involve release on private lands near a local community, with the understanding that bison would likely range onto other lands as the population grew. Bison

would be expected to eventually expand to state and/or federal public lands, including the Innoko Refuge.

Currently the plan describes the wood bison project as an “introduction” in some sections and a “reintroduction” in others. (See pages 1-25, 2-2, 2-5, 2-93 and 3-85). These terms have different meanings and management implications and we find the term “introduction” problematic. For these reasons we request the CCP refer to the wood bison effort as “*the State’s wood bison restoration project*” (or simply “*wood bison project*”).

Moving beyond terminology, we understand that if wood bison populations expand on to the Refuge, the US Fish and Wildlife Service (Service) has a responsibility to monitor potential impacts and take or recommend management actions if necessary. Therefore, the State supports the general intent of Objective 11 on page 2-5 to monitor current and future wildlife populations and plant communities. We agree that “*no data exist regarding how resident wildlife populations (such as small mammals, ground nesting birds, medium to large carnivores, and existing ungulates) and plant communities changed once wood bison were introduced.*” Much is known, however, about bison and grazing ecology in northern latitudes. Also, the 2007 Environmental Review conducted by ADF&G¹, the joint Service/ADF&G review of wood bison restoration², and other independent reviews³ together indicate that, at the densities expected, bison will likely have negligible or beneficial effects on other wildlife and the environment. The discussion of potential long term monitoring efforts is also reasonable, while understanding there will be little or no measurable effects for several years following a restoration since bison numbers will remain small for some time. We invite the Innoko Refuge staff to contact ADF&G to clarify any questions or concerns about the project as it moves forward.

The rationale for Objective 11 also appears to question whether wood bison existed in the area in relatively recent times. Although we recognize that no remains have yet been found on the Innoko Refuge, in a broader context, wood bison were very likely present in the Innoko region. Remains have been documented approximately 150 miles east, near Tanana; and 100 miles west, near St. Michael.⁴ More recently, an oral history from an elder in Galena noted that he has heard stories referring to wood bison (the “big animal”) being present in the Kaiyuh Hills area in more recent times, though a specific date is unknown⁵.

It is not surprising remains have not been found on Innoko Refuge, given the terrain (silty rivers with mud banks yield few remains compared to waterways with gravel bars). In

¹ Wood Bison Restoration in Alaska: A Review of Environmental and Regulatory Issues and Proposed Decisions for Project Implementation, 2007

² found in Appendix A in the above-referenced Environmental Review

³ conducted by the Wildlife Society-Alaska Chapter and the Wildlife Transplant Policy review committee as reported in Appendix F of the above-referenced Environmental Review

⁴ Skinner, M.F., and O.C. Kaisen, 1947. The Fossil Bison of Alaska and Preliminary Revision of the Genus. *Bulletin of the American Museum of Natural History* 89:126-256; as noted in STEPHENSON, R. O., S. C. GERLACH, R. D. GUTHRIE, C. R. HARRINGTON, R. O. MILLS, AND G. HARE. 2001. AND *Wood bison in late Holocene Alaska and adjacent Canada: paleontological, archaeological and historical records. Wildlife and People in Northern North America. Essays in honor of R. Dale Guthrie.* S. C. Gerlach, and M. S. Murray, editors. British Archaeological Reports, International Series 944.)

⁵ personal communication from Glenn Stout, Galena Area Biologist, ADF&G

addition, focused efforts to search for wood bison remains on the refuge itself have not occurred; although, the remains of earlier forms of bison have been found in the region. Lastly, the ample suitable habitat in the area further supports the premise that wood bison occurred on the Refuge in the recent past.

Fisheries Management

3.3.3.10 Fish

The following comments address sections located on page 3-86. We recognize the purpose of these sections is to address Refuge concerns regarding fisheries; however, the discussion appears overly negative without also recognizing existing management practices or other sections of the plan that help alleviate the concerns.

Increased Fishing Pressure

We appreciate the discussion in Environmental Consequences (Page 4-6, Section 4.2.2.2 Fish Populations) that recognizes “*neither alternative is anticipated to result in over-harvesting under current or projected levels of fishing pressure*” and that “*the refuge would work with the appropriate State and Federal regulatory or management bodies should adverse effects occur.*” We request this information as well as references to the fishery-related Objectives (2, 17, 34, 69 and 74) be referenced in this section so readers are aware of proposed actions to address these concerns.

Alteration of Wild Salmon Stocks Caused by Artificial Salmon Enhancement

Some stocks of salmon in the Yukon Drainage have shown variability in abundance, which is normal in wild salmon stocks. While a limited mitigation program exists to supplement Chinook salmon production lost to the Whitehorse Dam in Canada, there are no enhancement programs presently contemplated elsewhere in the Yukon. The discussion of potential impacts of salmon enhancement activities seems unnecessarily pessimistic and does not account for state procedures in place to prevent these impacts. Also, since Yukon River hatcheries are unlikely, a specific reference to hatchery fish seems unnecessary and is already covered by the general statements. Finally, should enhancement programs be proposed and evaluated, ADF&G has highly developed processes to ensure the genetic viability and maintenance of all affected fish stocks. To address these concerns, we recommend the following revision of the last half of this section:

However, enhancement could develop large populations of particular stocks that would be heavily exploited. Such high exploitation of enhanced stocks could lead to pressure on more vulnerable smaller stocks. However, ADF&G has rigorous policies and guidelines for preventing or mitigating the potential for inadequate escapement, loss of genetic diversity, or an unsustainable harvest. If carefully planned and implemented under both State and Service protocols, enhancement could supplement wild salmon production and safely increase salmon harvests.

In addition, we request the word “*artificial*” be removed from both the heading and the second sentence. “*Artificial*” is not defined, while the term “*enhancement*” is consistent with the Management Policies and Guidelines outlined in Section 2.4, and Table 2-2.

Off-Refuge Harvest of Refuge Whitefish and Salmon Stocks

This section correctly states that mixed stock harvests can affect population size and structure; however, management of salmon harvests in the Yukon River is specifically designed to avoid affecting individual stocks of fish. Genetic sampling techniques can rapidly identify particular stocks of fish in-season, but it is expensive and not often done. We therefore request revision of the second sentence: “*Because genetic fish sampling that can rapidly identify particular fish stocks is expensive and rarely used, individual fish stocks could be disproportionately harvested during a harvest.*” We also request the addition of a new sentence at the end of this section to avoid the impression that these legitimate management issues are not routinely addressed: “*ADF&G considers all these factors in fishery management to avoid long term detrimental impacts.*”

Other Page-Specific Fishery Comments

Page 3-99, 3.4.5, Subsistence, fourth paragraph: We request noting that while salmon stocks had reduced abundance from 1998-2002, overall they have displayed the normal variability in abundance expected for wild salmon stocks. There was a record fall chum run in 2005 and near record summer chum run in 2006. As currently written the paragraph gives the impression of steadily declining stocks of salmon, which is not the case. Windisch-Cole is dated and more recent information is available. Please see:

- [Yukon River Fall Chum Salmon Stock Status and Fall Season Salmon Fisheries; a Report to the Alaska Board of Fisheries \(SP No. 06-36 - PDF file \(1010K\)\)](#)

<http://www.sf.adfg.state.ak.us/FedAidPDFs/sp06-36.pdf>

- [Yukon River Summer Chum Salmon Stock Status, 2006; a Report to the Alaska Board of Fisheries \(SP No. 06-34\) - PDF file \(354K\)](#)

<http://www.sf.adfg.state.ak.us/FedAidPDFs/sp06-34.pdf>

- [Potential Causes of Size Trends in Yukon River Chinook Salmon Populations \(RIR No. 06-07\) - PDF file \(405K\)](#)

<http://www.cf.adfg.state.ak.us/region3/pubs/yukon/06bofjtcchin.pdf>

The following is a suggested rewrite of the fourth and fifth paragraphs of section 3.4.5 (Subsistence) that we feel provides a more appropriate description of the status of fish in the region:

Fish are the most relied upon subsistence resource in the Innoko Region. Subsistence fishing occurs year-round, although summer and fall salmon runs have historically been the most important in terms of catch volume. Salmon and other fish are typically harvested with nets and preserved for later use. The Yukon River and its tributaries provide the bulk of salmon harvested, but these stocks can show substantial variability in seasonal abundance, as normally expected in wild salmon stocks. Very low salmon returns were recorded in the Yukon River drainage in 2000

and 2001, but some stocks rebounded with record or near record returns for portions of the chum salmon run in 2005 and 2006. (ADF&G 2006)

Specific subsistence harvest figures for salmon are not available for individual area villages over time, but in 2005, 159 households in Grayling, Anvik, Shageluk, and Holy Cross reported harvesting a combined total of 6,321 Chinook and 8,296 chum salmon (ADF&G 2005). In 1990-91, these residents harvested approximately 61,000 pounds non-salmon fish species. During periods of low salmon returns, such as those experienced in 2000-01, subsistence users reliance on species of fish other than salmon increased. These include whitefish, northern pike, sheefish, burbot, Arctic grayling, longnose sucker, Alaska blackfish, and lampreys. (Brown 2007)

Management Policies and Guidelines

The revised draft CCP does not contain the most recent language in the Regional Management Policies and Guidelines. A number of technical changes and updates have been made since January 2007. Attachment A itemizes requested changes that represent the most recently agreed-upon version of this mutually acceptable language.

Goals and Objectives

Page 2-3, 2.1, Objective 6, Rationale, first paragraph, last sentence: The Alaska Board of Game and the Federal Subsistence Board make decisions concerning allocation of wildlife. The refuge provides information to these deliberative boards to aid in decision making processes. We suggest the following revision:

Refuge Managers need current information on the status and trend of the moose population to assist with decisions affecting allocation of this resource and to continue participating....

Page 2-16, 2.1, Objective 54, Rationale, first sentence: Moose are important to subsistence users as well as others, both locally and regionally. Consistent with Objective 27, we suggest the first sentence be revised as follows:

Both moose and caribou are important to humans in Interior Alaska, and it is...

Page 2-17, Objective 54, Rationale, last sentence: Consistent with our comment for Objective 6, we request the following revision:

This information will assist the refuge, agencies and Boards responsible for management of moose and caribou populations, as well as fire.

Appendix C, Predator Control

We understand this appendix is currently under review and may change. If retained, we request use of the revised version.

Page Specific Comments

Page 2-81, 2.9.2, Management Categories, Wilderness Management, fourth sentence: Though we recognize this language is carried forward from the previous CCP, the reference to “*traditional motorized access*” nonetheless mischaracterizes access provisions in the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA Section 1110(a) allows specific modes of access for “*traditional activities.*” ANILCA Section 811(b) references “*and other means of surface transportation traditionally employed...*” To avoid the need to clarify these nuances, we recommend the sentence be rewritten as follows:

Motorized access pursuant to ANILCA Sections 811 and 1110 is allowed.

Page 2-86, 2.10.2, last sentence: It is inaccurate to indicate that “*any activity*” conducted in Wilderness would be subject to a minimum requirements analysis. Please clarify that this applies only to certain administrative activities as shown in the footnote and associated notation within Table 2-2.

Page 2-93, Table 2-8, Air Taxi Issue, Alternative B: We request that the table be revised consistent with Table 1 in the Summary of the Draft Revised CCP and EA (see also section 1.9.2, page 1-24), which states:

The Refuge proposes to address this issue through continued monitoring of air taxi operators and potential future visitor service planning.

Page 3-5 and 3-6, 17(b) Easements and Figure 3-1: Our records show the three listed easements (site 39aC5, site 1D1 and trail 8D1) but also show the following two easements in the Holy Cross, D-2 Quad: trails EIN 39a C5 and 22 C5. A more thorough review of the conveyance files was not performed; however, the Quad maps showing these easements are assumed by the BLM to be accurate and are updated with each Decision document. The Holy Cross, D-2 Quad revisions were done in 2003.

Page 3-6, 3.1.1.8, RS 2477 Rights-of-Way: Please revise this section to reflect our most recent agreement on May 28, 2008. An alternative solution might be to limit this section to only Table 3-2 and a reference to section 2.4.13.9.

Page 3-73, 3.3.2.4, Wolf, second paragraph: The density of wolves appears to be incorrectly referenced. The given estimate likely applies to density per 1,000 square miles rather than per square mile.

Page 3-85, 3.3.3.6, Moose, first paragraph, second sentence: Please replace the reference to “sport” hunters with “non-local” hunters. State general hunting regulations no longer reference the term “sport.” “Non-local” adequately distinguishes between the two user groups in this context.

Page 3-85, 3.3.3.7, Predator Control: While the discussion of the subject is accurate, we request that the heading and narrative be revised to change the term “*control*” to

“management.” This term more accurately reflects recent discussions and direction taken concerning the management of predator populations in Alaska.

Page 3-85, section 3.3.3.8. This discussion notes that “*little time is available to document existing conditions from which to measure future changes, if any.*” Since it will be at least several years before bison are likely to make their way to the Refuge from the initial off-Refuge project location, we question the basis for the concern that the Refuge may not have enough time to design and implement any actual monitoring that might be determined necessary. See general wood bison comment.

Pages 3-99 thru 3-101, Section 3.4.5, Subsistence: Harvest data for refuge area communities compiled by the Division of Subsistence are the primary source of information used in this section and are believed to be reasonably accurate. However, where harvest numbers are presented, we request the text be revised to read similar to the following: “*A total of 118 moose were reported harvested,*” “*just two caribou were reported as being harvested,*” etc. The qualifier “reported” is important because it is possible that household surveys did not capture all the resources harvested, either because all households were not interviewed or a small number of households may have underreported their harvest.

Page 3-115, 3.5.1, Characteristics Common to All Units, first paragraph, second sentence: Consistent with the 1988 Innoko Record of Decision and pages 1-6 and 2-65 of the current draft, we request these pages be referenced and the section clarify that the Wapoo Hills and Kaiyuh Mountains units were not recommended for designation in the previous wilderness review. We suggest the following revision:

Though not recommended for designation in the previous wilderness review, most of the refuge lands within the Wapoo Hills and Kaiyuh Mountains units also exhibit all the core wilderness values.

Page 4-11, Section 4.6, Section 810 Evaluation. Although this is a very short and general evaluation, it is likely sufficient. We note, however, the 810 analysis in the Tetlin CCP is also short but provides more detail. A similar level of detail might be useful in the 810 analysis for the Innoko plan. It may also be helpful to clarify that subsequent 810 analyses will be done as needed if specific commercial or other activities are proposed in the refuge that could potentially affect subsistence uses or resources. We offer the following revision to the last sentence of the 810 analysis:

This evaluation concludes that the actions proposed in this management plan would not result in restrictions of subsistence uses; however, additional 810 analyses may be required during the implementation of this plan for specific proposals and actions.

Compatibility Determinations

The term “*high quality*” is found in several compatibility determinations (CDs) (e.g., pages F-15, F-74, F-81, and F-84). We request all references to “*high quality*” be revised consistent with Service Manual 605 FW 1.6, which provides direction applicable to both

commercial and recreational uses on refuges. FWS policy defines “*quality*” but not “*high quality*.” Use of “*high quality*” implies that other areas or experiences may be of *low quality*, which is not a desirable message. More importantly, we are concerned when this terminology is used in a management direction or objectives context, as it appears to set a high bar for management purposes but without any definition or standards. We suggest performing a word search on all CDs to remove “*high quality*” qualifiers when they may indicate or imply a management standard for experiential purposes.

Pages F-14 and F-15, Recreational Hunting, Stipulations (also relating to page F-4, Subsistence): No stipulations are required for subsistence use or many other uses, such as determining sustainability of practices through harvest monitoring, enforcement, etc. In contrast, similar activities by the small fraction of recreational hunters have such stipulations. An explanation of these inconsistencies is warranted or, consistent with recent resolution for this same issue in the Kanuti CCP/EA, we suggest imposing similar or identical stipulations for both subsistence and recreational hunting.

Page F-29, Snowmobiling, Description of Use: Snowmobiling is also addressed as a primary use in another CD. To avoid confusion, we recommend the following edit to the last sentence:

(See also Compatibility Determinations on Trapping and Non-Wildlife Dependant Recreation Activities)

Page F-30, Snowmobiling, Justification: We recommend incorporating a reference to ANILCA provisions, particularly for Titles VIII and XI, into this section.

Page F-33, Subsistence and trapping cabins, Description of Use, first paragraph, last sentence: We request “*local rural residents*” be changed to “*other trappers*” because use of trapping cabins is not limited to local rural residents.

Page F-42, Subsistence Harvest of House Logs, Refuge Special Conditions, fourth bullet: When evaluating permits on their merits, as noted in the Description of Use, we recommend the Refuge consider both the needs of the applicant as well as the following considerations for the resource. Concerns for clear-cutting or group selection are not well explained and, if the intent is to maintain white spruce in the area, seem counterproductive. If impacts to wild character from overly large openings or loss of diversity are the concern, group selection could still be a good choice. One of the benefits of group selection can be the long-term maintenance of white spruce stands, as the opening will warm the forest soils, thus preventing the development of permafrost. Riparian white spruce stands in the far north typically begin to cool as the trees mature and the organic layer accumulates to greater depths. This cooling can result in the development of permafrost and the loss of the white spruce stands, which then convert to black spruce. In addition, because the Anticipated Impacts of Use section addresses minimizing impacts to anadromous fish, we question why the restrictions specifically do not apply to “leaners.” These trees would contribute large woody debris to the river more rapidly than trees further from the river bank. Large woody

debris has been shown to be of significant value to fish habitat and stream/river dynamics, even in very active rivers in the far north.

Page F-47, Scientific Research, first full paragraph on page: Not all refuge uses which are “*allowed*” require a special use permit. We suggest the following revision of the first sentence:

A special use permit may be required before certain uses on the refuge may be authorized. This permit may contain stipulations to help ensure compatibility with refuge purposes.

Page F-56, Helicopter Landings, Stipulations, third bullet: We understand the introductory paragraph currently indicates regional stipulations are “typical” and may not appear in all permits. However, since certain activities may require flying a helicopter at altitudes below 2000 feet and/or herding wildlife for scientific research or management, we request substituting the more comprehensive introductory language from the Tetlin Refuge CDs (noted below). For consistency, we recommend also including it in other CDs with permit stipulations:

The conditions listed below are generally included on refuge permits issued for [helicopter landings], mostly to minimize impacts and ensure compatibility of these uses with refuge purposes. Conditions included on each permit may vary somewhat as needed or appropriate for the specific operations being proposed, and if changing situations warrant revisions.

Page F-61, Commercial Transporter Services, Description of Use, last paragraph: It is unclear how advance permitting prevents overcrowding when there is no limit on the number of trips or clients that can be dropped off. There is also no data provided to link the number of clients being dropped off with the quality of experience and no programs to understand the experiential values of the area. We recommend ending the third sentence as follows: “...and **potentially** producing an overcrowded situation.”

Page F-68, Commercial Big Game Hunting Guide Services, italicized paragraph on 2005 Prospectus: While we understand that the 2005 prospectus was allocated using this direction, it would be useful to note that future allocations would utilize the more recent processes described in *605 FW 1 General Guidelines for Wildlife-Dependent Recreation* and *605 FW 2 Hunting*.

Page F-95, Reburial of Archaeological Human Remains per State and Federal Guidelines, Public Review and Comment: We assume this text is in error, as it appears in the public review draft of the revised CCP and comments are still being accepted.

Page F-97, Reburial of Archaeological Human Remains, second bullet on page: It is unclear why this CD includes a condition prohibiting helicopter use when it can be allowed by special use permit under 43 CFR 36.11(f)(4). We understand this is a “typical” regional

stipulation, therefore, we again request the introductory language from the Tetlin CDs (see above comment for F-56) be applied to this CD.

Regional Stipulations Necessary to Ensure Compatibility

We understand many of the compatibility stipulations are also regional permit conditions. We have brought the following comments to the attention of the Region to address in a region-wide review of permit stipulations. We provide them here for your information within the context of this review.

- *“Use of off road vehicles (except snowmachines with adequate snow cover) is prohibited unless specifically authorized in writing in this permit.”*

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 when necessary, snowmachine use be addressed by separate stipulation(s).

- *“The permittee will take no action that interferes with subsistence activities...”*

As written, this stipulation provides no allowance for accidental incidents or instances where a permit holder is not aware they are interfering with subsistence uses. For clarification and enforcement reasons, we suggest inserting *“intentionally”* before *“interferes.”*

- *“The permittee or his/her primary users shall notify the refuge manager during refuge working hours in person or by telephone before beginning and upon completing activities allowed by this permit.”* and;
- *“Prior to beginning any activities allowed by this permit, the permittee shall...”*

For the two bullets above, it may be useful to include more specific timeframes in which notification must occur.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator

Attachment A
Management Policies and Guidelines

Updates Since January 2007

Page 2-45, 2.4.10.2, Fire Management, Wildland Fire Suppression, first paragraph, last sentence: “Refuge lands have been classified by using these fire management options zones ~~for limited, modified, full, or critical suppression~~, with all facilities mapped.”

Page 2-46, 2.4.11.1, Wildlife Inventory and Monitoring Plan, last two sentences: “~~The I & M Plan will be forwarded to the regional office for review by the regional refuge biologist and other professional staff prior to final approval by the regional refuge chief.~~ The refuge will update its I & M Plan every two years, ~~but will only need regional review and approval every five to eight years.~~ Every five to eight years, the I & M Plan will be reviewed by the regional refuge biologist and other professional staff prior to final approval by the regional refuge chief.”

Page 2-50, 2.4.12, Subsistence Use Management, first paragraph, first sentence: “Providing the opportunity for continued subsistence use by local residents is one of the purposes of ~~every national wildlife refuge in Alaska except the Kenai National Wildlife Refuge~~ the refuge, as stated in Title III of ANILCA.”

Page 2-53, 2.4.13.9, RS 2477 Rights-of-Way: Please replace this section with the following language (per our May 28, 2008 agreement):

The State of Alaska identifies numerous claims to roads, trails, and paths across federal lands under Revised Statute 2477 (RS 2477), a section in the Mining Act of 1866 that states, “The right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted.” RS 2477 was repealed by the Federal Land Policy and Management Act of 1976, subject to valid existing claims.

Assertion and identification of potential rights-of-way does not establish the validity of these claims nor the public’s right to use them. The validity of all RS 2477 rights-of-way will be determined on a case-by-case basis, either through the courts or by other legally-binding document. The State of Alaska has identified in Alaska Statute 19.30.400 seven routes on Tetlin Refuge it claims ~~asserts~~ may be asserted ~~claimed~~ as rights-of-way under RS 2477.

Page 2-59, 2.4.17.5, Commercial Gathering of Other Resources: “Commercial gathering of other resources (e.g., antlers or mushrooms) requires a special use permit under 50 CFR 27.51 and ~~is allowed~~ may be authorized in Intensive and Moderate management.”

Page-Specific Comments

Pages 2-38 and 2-39, 2.4.7, Mitigation, bulleted list: Please change the bullets back to numbers, as the list represents an “order of application” and was originally numbered accordingly.

Pages 2-64 and 2-65, 2.6 and 2.7: We suggest these two sections be relocated within the chapter to appear after Table 2-2. Currently, they are arranged between the Table Introduction and the Table itself, making section 2.5 (Management Categories Table) appear discontinuous.

Cross-References

We found numerous instances of incorrectly or nonspecifically referenced sections throughout this part of Chapter 2 and Table 2-2. We recommend performing a thorough cross-checking of citations and cross references, including comparisons with the Regional Management Policies and Guidelines document. The following represent a few noted examples:

Page 2-52, 2.4.13.6, Subsistence Access: Please update the reference to 2.4.12.1.

Page 2-54, 2.4.14, Recreation and Other Public Use, third paragraph, second sentence: Please update the reference to 2.4.12.

Page 2-59, 2.4.17.7, Other Commercial Uses, last sentence: Please update the reference to 2.4.13.7.

Table 2-2: Please add “Section 2.2” to all places within the Table that formerly listed “Section 1.” Section 1 originally identified the “Introduction” to the Management Guidelines, which is Section 2.2 in the revised CCP. Also, please update references throughout the Table to cite the particular section for each activity, as opposed to the general section each activity falls under in the narrative (e.g., for “Off-Road Vehicles,” change 2.4.12 to 2.4.12.1, and 2.4.13 to 2.4.13.2).