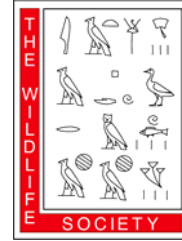




THE WILDLIFE SOCIETY ALASKA CHAPTER

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January 10, 2007

Mr. Karl Kassel, Director
Parks and Recreation Department
Fairbanks North Star Borough
19th Avenue & Lathrop Street
Fairbanks, AK 99701

Subject: Scoping comments on Master Plan for the Tanana Lakes Recreation Area

Dear Mr. Kassel:

The Wildlife Society is an international, non-profit association dedicated to excellence in wildlife stewardship through science and education. The Alaska Chapter was founded in 1971 and is comprised of about 230 current and retired wildlife professionals and university students primarily from Alaska. Our mission is to enhance the ability of wildlife professionals to conserve diversity, sustain productivity, and ensure responsible use of Alaska's wildlife and habitats.

We applaud your efforts to develop a master plan to define purposes for the Tanana Lakes Recreation Area off South Cushman Street and provide guidance to ensure those purposes are fulfilled. We recognize efforts by the Fairbanks North Star Borough (FNSB) to secure funding and public input to remove debris, trash and contaminants; protect critical wildlife habitat; and provide public recreation. Please accept these scoping comments to help guide development and management of this unique area that represents one of the larger remaining wetlands in the city of Fairbanks.

Wildlife and habitat values.

As more wetlands are filled and converted for commercial and residential developments, remaining wetlands increasingly become important for flood control, removal of contaminants, water storage, and wildlife habitat. The portion of Tanana Lakes designated as a natural area will provide for the conservation of birds, fish, mammals, amphibians, invertebrates, and native plant species over time if recreational use and gravel extraction are managed to minimize disturbance to wildlife and prevent degradation of habitat.

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Birds. We suggest the FNSB seek recommendations from the Alaska Bird Observatory, Alaska Department of Fish and Game (ADFG), Arctic Audubon, Fairbanks Ducks Unlimited, Interior Alaska Chapter of the Ruffed Grouse Society, and the US Fish and Wildlife Service (USFWS) for methods to maintain current habitat values to the greatest extent possible. A diversity of wetland and upland habitats will ensure continued use by a variety of migratory birds. Within the designated natural area, the Borough should consider habitat manipulations that will enhance benefits to birds for feeding, resting, and nesting. Special consideration should be given to maintaining a diversity of water depths and associated plant communities and avoiding creation of deep, steep sided ponds. Shorelines with dense vegetation should be preserved because of their value as nesting and brood-rearing habitat. Maintaining wetland values in the designated natural area may help reduce aircraft strike hazard by attracting waterfowl away from the Fairbanks International Airport during migration periods, similar to Creamer's Field. However, disturbance resulting from duck hunting and motorized recreation at Tanana Lakes may reduce the effectiveness of this purpose.

Mammals. We suggest that the FNSB seek recommendations from ADFG concerning habitat manipulation to benefit mammals. In general, wetland management practices that benefit bird species will provide habitat for resident mammal species. Upland areas should be managed to provide a diversity of habitat types or plant successional stages to maximize wildlife diversity.

Fish. We suggest the FNSB seek recommendations on fish habitat from the Alaska Chapter of the American Fisheries Society, ADFG Division of Sport Fish, and the USFWS Fairbanks Fish and Wildlife Field Office. We caution that stocking fish can reduce habitat quality for several species of nesting waterfowl (scaup in particular) because most fish will compete with waterfowl for invertebrates. Further, fisherman walking along pond shores could disturb birds during the nesting and brood-rearing seasons. Thus, we ask FNSB to consider stocking fish only outside the designated natural area.

Other species. We ask the FNSB to recognize the benefits amphibians and insects provide to birds, mammals, fish, and plant species and consider impacts of proposed uses on these taxa.

Plants. We urge the FNSB to manage the designated natural area for native plant species and strive to keep invasive or non-native plant species from becoming established in the area. Invasive plants can disrupt natural ecological processes and diminish use by the public and wildlife. We recommend consultation with the USFWS Fairbanks Fish and Wildlife Field Office to consider Best Management Practices for prevention of spreading invasive species. Signs at the entrance can educate people about the risk of spreading invasive plants and invertebrates accidentally transported on vehicles, water vessels, and trailers, particularly those coming from outside of Alaska.

Human values.

The FNSB should manage the designated natural area for uses that are compatible with species conservation and wildlife-dependent recreation.

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Hunting. Waterfowl hunting should be allowed when compatible with the purposes of the area. The FNSB should consider working with Alaska Bird Observatory and the Fairbanks Chapter of Ducks Unlimited to establish permanent shelters that would serve as both duck hunting blinds (during open seasons) and wildlife observation blinds during other times of the year. Methods to control potential overcrowding caused by too many duck hunters should be included in the management plan. The Borough might consider establishing several permanent blinds on the area and restrict duck hunting to the blinds only and by permit on a first-come basis or by permit drawing. Other hunting should be allowed within existing State regulations.

Fishing. We support fishing in the western portion of the area, along with establishment of boat launches for safe access to water and protection of shoreline habitat. We recommend the FNSB monitor fishing activity in the eastern half of the area (which has limited fish habitat) to determine if user conflicts develop between fishers and visitors who are predominantly birdwatching or duck hunting.

Wildlife observation and photography. The area has historically been an important location for resident birders, wildlife professionals, and university students to observe birds. With the proper planning and improvements, this area could become a popular destination for more residents and non-residents seeking diverse wildlife-viewing opportunities. The FNSB should explore opportunities to develop covered platforms to facilitate wildlife watching and outdoor photography that could serve also as duck hunting blinds. We recommend the Borough work with the Alaska Bird Observatory and the Fairbanks Chapter of Ducks Unlimited to discuss the potential of developing this area for wildlife viewing.

Environmental education and interpretation. The FNSB should consider working closely with the FNSB School District to incorporate any needs or desires the District may have in the design of interpretive trails and parking areas for school buses. We believe one of the greatest assets of the area will be to educate the public, along with primary and secondary students, about responsible use of Alaska's fish, wildlife, and habitats. The close proximity of the area to public schools certainly provides the potential for using the area as outdoor classroom focusing on wetland habitats, similar to the purpose that Creamer's Field serves for upland habitats.

Restrictions on incompatible uses. The FNSB should give careful consideration to the appropriateness of an activity based on the seasonal timing of the use. To reduce wildlife disturbance, we recommend that roads and trails for motorized vehicles be kept to the minimum needed for access to the designated natural area. Recreational use of off-road vehicles and motorized watercraft should be prohibited in the designated natural area annually from 1 April to 15 October to avoid disturbance to wildlife during the migratory staging and breeding period for shorebirds and waterfowl. Another option more beneficial to wildlife would be a year-round prohibition of motorized recreation in the designated natural area to also avoid disturbance or displacement of moose and other winter-resident species. We recommend that gravel mining activities be minimized or

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avoided in the designated natural area during bird nesting periods in early-mid summer and during times of high bird use in spring and fall. Finally, we suggest limiting public uses around a circumscribed duck hunting area for safety purposes during the duck hunting season. We suggest that FNSB consult the Alaska Department of Public Safety, Bureau of Wildlife Enforcement for recommendations on public safety zones near hunting blinds.

The Alaska Chapter of The Wildlife Society appreciates this opportunity to provide scoping comments. We look forward to commenting on the draft master plan in the spring of 2007. Please do not hesitate to contact me at 456-8682 or tparagi@alaska.net if you have questions or would like further assistance in this effort.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Paragi". The signature is written in dark ink and is positioned above the typed name.

Thomas F. Paragi, President