1 Introduction

Scott Ralston/USFWS

Birders

This document presents an environmental assessment (EA) that evaluates three management alternatives for Sullys Hill National Game Preserve and potential environmental consequences of those alternatives. Alternative C is the proposed action of the U.S. Fish and Wildlife Service (Service) and is presented in chapter 6 as the draft comprehensive conservation plan (CCP) for the refuge. This chapter provides an introduction to the CCP process and describes the involvement of the Service, the state of North Dakota, the public, and others, as well as conservation issues and plans that affect Sullys Hill National Game Preserve.

The U.S. Fish and Wildlife Service has developed this draft CCP to provide a foundation for the management and use of Sullys Hill National Game Preserve, which is located in Benson County near the town of Fort Totten, North Dakota (see figure 1, vicinity map). When finalized, the CCP will serve as a working guide for management programs and actions over the next 15 years.

This draft CCP was developed in compliance with the National Wildlife Refuge System Improvement Act of 1997 (Improvement Act) and Part 602 (National Wildlife Refuge System Planning) of "The Fish and Wildlife Service Manual." The actions described in this draft CCP and EA meet the requirements of the Council on Environmental Quality regulations that implement the National Environmental Policy Act of 1969 (NEPA). Compliance with NEPA is also being achieved through involvement of the public.

The final CCP will specify the necessary actions to achieve the vision and purposes of the refuge. Wildlife is the first priority in refuge management, and public use (wildlife-dependent recreation) is allowed and encouraged as long as it is compatible with the refuge's purposes.

The draft CCP and EA have been prepared by a planning team comprised of representatives from various Service programs. In addition, the planning team used public input, public involvement, and the planning process as described in section 1.6, "The Planning Process."

After reviewing a wide range of public comments and management needs, the planning team developed alternatives for managing the refuge. The team recommended alternative C as the Service's proposed action for management of the refuge. This action addresses all substantive issues, while determining how best to achieve the

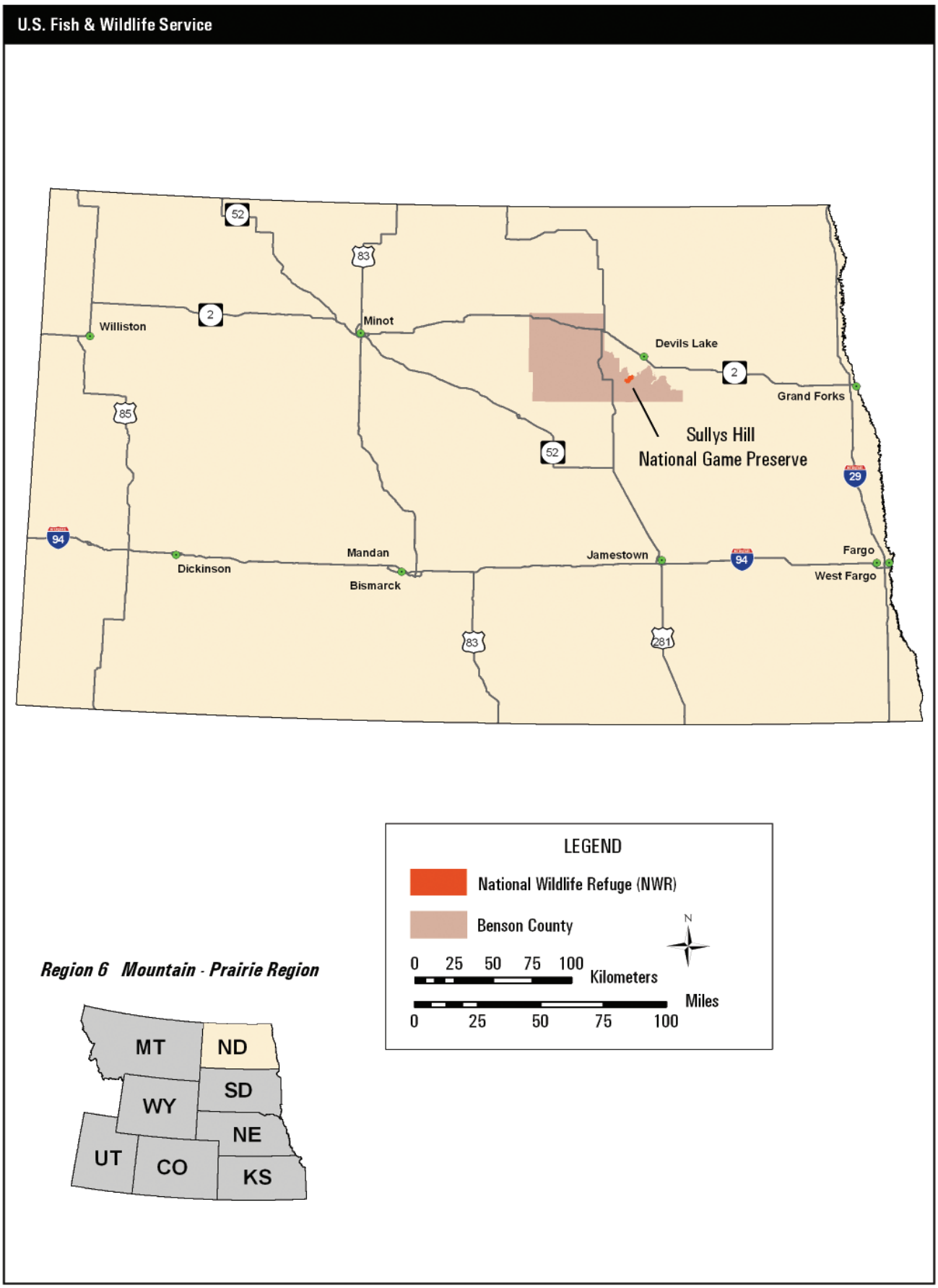

Figure 1. Vicinity map for Sullys Hill National Game Preserve, North Dakota.

purposes of the refuge. The proposed action and other alternatives are summarized in chapter 3. Chapter 4 describes the affected environment, and chapter 5 discusses the predicted effects (environmental consequences) of the proposed action and alternatives. Chapter 6 describes how the proposed action would be implemented.

1.1 PURPOSE AND NEED FOR THE PLAN

The purpose of this draft CCP is to identify the role that Sullys Hill National Game Preserve will play in support of the mission of the National Wildlife Refuge System (Refuge System) and to provide long-term guidance for management of refuge programs and activities. The CCP is needed:

- to communicate with the public and other partners in order to carry out the mission of the Refuge System;
- to provide a clear statement of direction for management of the refuge;
- to provide neighbors, visitors, and government officials with an understanding of the Service's management actions on and around the refuge;
- to ensure that the Service's management actions are consistent with the mandates of the Improvement Act;
- to ensure that management of the refuge is consistent with federal, state, and county plans; and
- to provide a basis for development of budget requests for the refuge's operation, maintenance, and capital improvement needs.

Sustaining the nation's fish and wildlife resources is a task that can be accomplished only through the combined efforts of governments, businesses, and private citizens.

1.2 THE U.S. FISH AND WILDLIFE SERVICE AND THE REFUGE SYSTEM

The Service is the principal federal agency responsible for fish, wildlife, and plant conservation. The Refuge System is one of the Service's major programs.

U.S. Fish And Wildlife Service

The mission of the U.S. Fish and Wildlife Service, working with others, is to conserve, protect, and enhance fish and wildlife and their habitats for the continuing benefit of the American people.

Over a century ago, America's fish and wildlife resources were declining at an alarming rate. Concerned citizens, scientists, and hunting and angling groups joined together to restore and sustain America's national wildlife heritage. This was the genesis of the U.S. Fish and Wildlife Service.

Today, the Service enforces federal wildlife laws, manages migratory bird populations, restores nationally significant fisheries, conserves and restores vital wildlife habitat, protects and recovers endangered species, and helps other governments with conservation efforts. In addition, the Service administers a federal aid program that distributes hundreds of millions of dollars to states for fish and wildlife restoration, boating access, hunter education, and related programs across America.

Service Activities In North Dakota (2005)

Service activities in North Dakota contribute to the state's economy, ecosystems, and education programs. The following list describes the Service's presence and activities:

- employed 201 people in North Dakota
- assisted by 623 volunteers who donated more than 14,245 hours in support of Service projects
- managed two national fish hatcheries and one fish and wildlife management assistance office
- managed 65 national wildlife refuges encompassing 342,799 acres (0.8 percent of the state)
- managed 12 wetland management districts (WMDs) including:
  - 284,317 acres of fee waterfowl production areas (0.6 percent of the state)
  - 1,046,358 wetland acres under various leases or easements (2.4 percent of the state)
- hosted more than 394,063 annual visitors to Service-managed lands including:

  - 152,160 hunting visits
  - 2,360 trapping visits
  - 83,650 fishing visits
  - 142,281 wildlife observation visits
  - environmental education programs for over 51,000 students
- provided $3.3 million to North Dakota Game and Fish Department (NDGF) for sport fish restoration and $3.4 million for wildlife restoration and hunter education
- helped private landowners restore more than 191,225 acres on 4,464 sites and restore 47.8 miles of river since 1987, through the Partners for Wildlife Program
- employed 11 Partners for Wildlife program managers
- paid North Dakota counties $352,271 under the Refuge Revenue Sharing Act (funds used for schools and roads)

National Wildlife Refuge System

In 1903, President Theodore Roosevelt designated the 5.5-acre Pelican Island in Florida as the nation's first wildlife refuge for the protection of brown pelicans and other native, nesting birds. This was the first time the federal government set aside land for wildlife. This small but significant designation was the beginning of the Refuge System.

One-hundred years later, the Refuge System has become the largest collection of lands in the world specifically managed for wildlife. It encompasses over 96 million acres within 547 refuges and over 3,000 small areas for waterfowl breeding and nesting. Today, there is at least one refuge in every state, including the territories of Puerto Rico and the U.S. Virgin Islands.

In 1997, the Improvement Act established a clear mission for the Refuge System.

> *The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.*

The Improvement Act states that each national wildlife refuge (that is, each unit of the Refuge System, which includes wetland management districts) shall be managed:

- to fulfill the mission of the Refuge System;
- to fulfill the individual purposes of each refuge and district;
- to consider the needs of fish and wildlife first;
- to fulfill the requirement of developing a CCP for each unit of the Refuge System, and fully involve the public in the preparation of these plans;
- to maintain the biological integrity, diversity, and environmental health of the Refuge System;
- to recognize that wildlife-dependent recreation activities including hunting, fishing, wildlife observation, wildlife photography, and environmental education and interpretation, are legitimate and priority public uses; and
- to retain the authority of refuge managers to determine compatible public uses.

In addition to the mission for the Refuge System, the wildlife and habitat vision for each unit of the Refuge System stresses the following principles:

- Wildlife comes first.
- Ecosystems, biodiversity, and wilderness are vital concepts in refuge and district management.
- Habitats must be healthy.
- Growth of refuges and districts must be strategic.
- The Refuge System serves as a model for habitat management with broad participation from others.

Following passage of the Improvement Act, the Service immediately began to carry out the direction of the new legislation, including preparation of CCPs for all national wildlife refuges and wetland management districts. Consistent with the Improvement Act, the Service prepares all CCPs in conjunction with public involvement. Each refuge and each district is required to complete its CCP within a 15-year timeframe (by 2012).

People And The Refuge System

The nation's fish and wildlife heritage contributes to the quality of American lives and is an integral part of the country's greatness. Wildlife and wild places have always given people special opportunities to have fun, relax, and appreciate the natural world.

Whether through bird watching, fishing, hunting, photography, or other wildlife pursuits, wildlife

recreation contributes millions of dollars to local economies. In 2002, approximately 35.5 million people visited the Refuge System, mostly to observe wildlife in their natural habitats. Visitors are most often accommodated through nature trails, auto tours, interpretive programs, and hunting and fishing opportunities. Significant economic benefits are generated for the local communities that surround refuges and wetland management districts. Economists report that Refuge System visitors contribute more than $792 million annually to local economies.

1.3 NATIONAL AND REGIONAL MANDATES

Refuge System units are managed to achieve the mission and goals of the Refuge System, along with the designated purpose of the refuges and districts (as described in establishing legislation, executive orders, or other establishing documents). Key concepts and guidance of the Refuge System are in the Refuge System Administration Act of 1966 (Administration Act), Title 50 of the Code of Federal Regulations (CFR), "The Fish and Wildlife Service Manual," and the Improvement Act.

The Improvement Act amends the Administration Act by providing a unifying mission for the Refuge System, a new process for determining compatible public uses on refuges and districts, and a requirement that each refuge and district be managed under a CCP. The Improvement Act states that wildlife conservation is the priority of Refuge System lands and that the Secretary of the Interior will ensure that the biological integrity, diversity, and environmental health of refuge lands are maintained. Each refuge and district must be managed to fulfill the Refuge System's mission and the specific purposes for which it was established. The Improvement Act requires the Service to monitor the status and trends of fish, wildlife, and plants in each refuge and district.

A detailed description of these and other laws and executive orders that may affect the CCP or the Service's implementation of the CCP is in appendix A. Service policies on planning and day-to-day management of refuges and districts are in the "Refuge System Manual" and "The Fish and Wildlife Service Manual."

1.4 REFUGE CONTRIBUTIONS TO NATIONAL AND REGIONAL PLANS

Sullys Hill National Game Preserve contributes to the conservation efforts described here.

Fulfilling The Promise

A 1999 report, "Fulfilling the Promise, The National Wildlife Refuge System" (USFWS 1999), is the culmination of a yearlong process by teams of Service employees to evaluate the Refuge System nationwide. This report was the focus of the first national Refuge System conference in 1998—attended by refuge managers, other Service employees, and representatives from leading conservation organizations.

The report contains 42 recommendations packaged with three vision statements dealing with wildlife and habitat, people, and leadership—this CCP deals with these three major topics. The planning team reviewed the recommendations in the report for guidance during CCP planning.

Partners In Flight

The "Partners in Flight" program began in 1990 with the recognition of declining population levels of many migratory bird species. The challenge, according to the program, is managing human population growth while maintaining functional natural ecosystems. To meet this challenge, Partners in Flight worked to identify priority land bird species and habitat types. Partners in Flight activities have resulted in the development of 52 bird conservation plans covering the continental United States.

The primary goal of Partners in Flight is to provide for the long-term health of the bird life of this continent. The first priority is to prevent the rarest species from becoming extinct. The second priority is to prevent uncommon species from descending into threatened status. The third priority is to "keep common birds common."

There are 58 physiographic areas, defined by similar physical geographic features, wholly or partially contained within the contiguous United States, and several others wholly or partially contained in Alaska. The Sullys Hill National Game Preserve lies within the physiographic area known as the northern mixed-grass prairie, area 37 (see figure 2, physiographic areas).

Physiographic Area Description

The northern mixed-grass prairie physiographic area includes almost the entire eastern half of South Dakota and central North Dakota, from the Red River Valley on the east, to the Missouri River and Montana border on the south and west. In Canada, it includes a small portion of southern

Manitoba and a swath that crosses Saskatchewan and extends into Alberta. The southern edge of this physiographic area is the terminus of a glacial moraine parallel to the course of the nearby Missouri River. To the north, prairie gives way to aspen parkland.

Precipitation declines and evaporation rates increase from east to west across the northern mixed-grass prairie, resulting in differences in the height of dominant grasses. To the east, the mixed grass begins as topography rises out of the tall-grass prairie of the Red River Valley. Grass height gradually decreases toward the western boundary of this physiographic area.

Because of the glacial history of the northern mixed-grass prairie and the relationship between precipitation and evapotranspiration, the area is dotted with thousands of depressions that range from permanently- to periodically-wet. This area is known as the Prairie Pothole Region.

Priority bird species and habitats of the northern mixed-grass prairie include the following:

Grassland

- Baird's sparrow
- greater prairie-chicken
- McCown's longspur
- Sprague's pipit
- Le Conte's sparrow

Wetland

- yellow rail
- Nelson's sharp-tailed sparrow
- marbled godwit

Riparian Woodland

- Bell's vireo

River Sandbars

- piping plover
- waterfowl
- shorebirds

Maintenance of large, unfragmented grassland ecosystems is the conservation objective for areas where agriculture is not dominant. On the drift prairie and other agricultural areas, conservation of discrete blocks of grassland-wetland complexes is recommended.

North American Waterfowl Management Plan

Written in 1986, the "North American Waterfowl Management Plan" (NAWMP) envisioned a 15-year effort to achieve landscape conditions that could sustain waterfowl populations. Specific NAWMP objectives are to increase and restore duck populations to the average levels of the 1970s—62 million breeding ducks and a fall flight of 100 million birds.

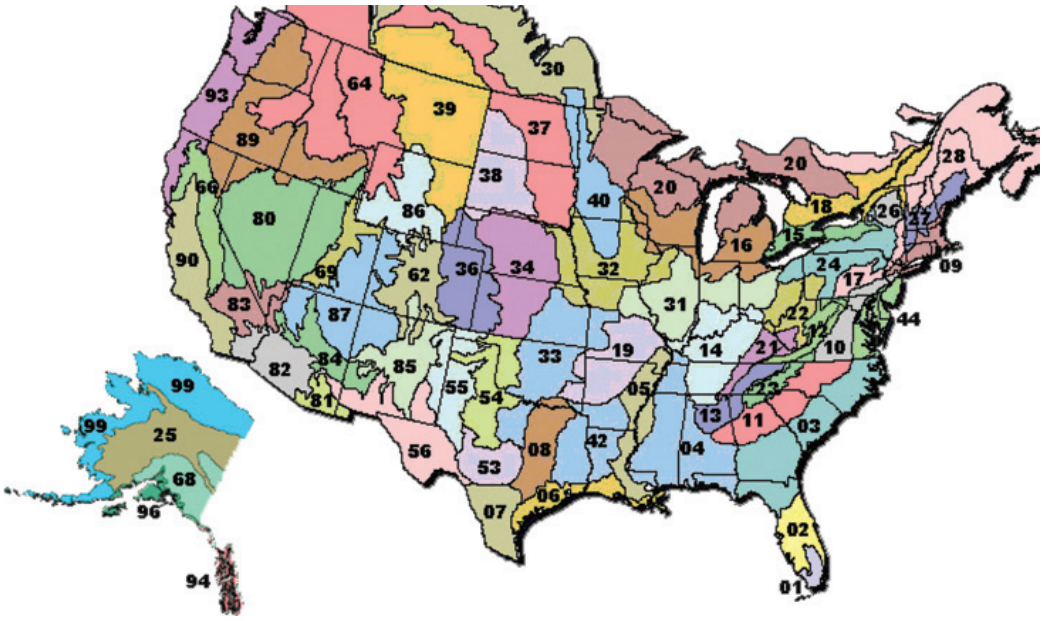

Figure 2. Physiographic areas of the United States.
(*Source: Partners in Flight*)

By 1985 waterfowl populations had plummeted to record lows. Habitat that waterfowl depend on was disappearing at a rate of 60 acres per hour. Recognizing the importance of waterfowl and wetlands to North Americans and the need for international cooperation to help in the recovery of a shared resource, the United States and Canadian governments developed a strategy to restore waterfowl populations through habitat protection, restoration, and enhancement. Mexico became a signatory to the plan in 1994.

The plan is innovative because of its international scope, plus its implementation at the regional level. Its success depends on the strength of partnerships called "joint ventures," involving federal, state, provincial, tribal, and local governments; businesses; conservation organizations; and individual citizens.

Joint ventures are regional, self-directed partnerships that carry out science-based conservation projects through a wide array of community participation efforts. Joint ventures develop implementation plans focusing on areas of concern identified in the plan. Sullys Hill National Game Preserve is part of the "Prairie Pothole Joint Venture."

State Comprehensive Conservation Wildlife Strategy

Over the past several decades, documented declines of wildlife populations have occurred nationwide. Congress created the State Wildlife Grant (SWG) program in 2001. This program provides states and territories with federal dollars to support conservation aimed at protecting wildlife and preventing species from becoming endangered under the Endangered Species Act. The SWG program represents an ambitious endeavor to take an active hand in keeping species from becoming threatened or endangered in the future.

According to the SWG program, each state, territory, and the District of Columbia were required to complete a comprehensive wildlife conservation strategy (CWCS) by October 1, 2005, in order to receive future funding.

These strategies help define an integrated approach to the stewardship of all wildlife species, with additional emphasis on species of concern and habitats at risk. The goal is to shift focus from single-species management and highly specialized individual efforts to a geographically based, ecosystems and landscape-oriented, fish and wildlife conservation effort. The Service approves CWCSs and administers SWG program funding.

The CWCS for the state of North Dakota was reviewed and information was used during development of this CCP. Implementation of CCP habitat goals and objectives will support the goals and objectives of the CWCS.

1.5 ECOSYSTEM DESCRIPTION AND THREATS

Missouri Main Stem River Ecosystem

Sullys Hill National Game Preserve is located within the Hudson Bay watershed, which is part of the federally recognized "Missouri Main Stem River Ecosystem" (see figure 3, ecosystem map). This ecosystem includes portions of the Missouri River and Hudson Bay watersheds. An initial ecosystem management plan identified four focus areas needing the highest priority for protection and evaluation: wetlands, Missouri River, native prairie, and riparian areas. Priorities were based on significance in the ecosystem, species diversity, risk or threat to the entire focus area, public benefits, international values, and trust resources. Although a detailed analysis of habitats, threats, and priorities for this ecosystem has not been completed, a vision and set of goals and objectives have been developed for each focus area, as described in the following narrative.

Wetlands

Threats: The glaciated prairies on North Dakota, South Dakota, and northeastern Montana cover approximately 60 million acres. Once an abundance of prairie pothole wetlands in a sea of native prairie, the area is now the "breadbasket" of the country and intensively farmed. Drainage for agricultural purposes has reduced wetlands by over 40%—from 7.2 million acres to 3.9 million acres.

Vision: Diverse, wetland habitats and watersheds that provide an abundance and diversity of native flora and fauna in the ecosystem for the benefit of the American public.

Missouri River

Threats: Originating in the Rocky Mountains of southcentral Montana, the Missouri River is vastly different from the "untamed" floodplain system of even 50 years ago. The river flows 2,300 miles—traversing seven states and passing through seven main stem dams built and maintained by the federal government. Over 900 miles (nearly 60%) of the former upper river passing through Montana, North Dakota, South Dakota, and Nebraska now lie under permanent

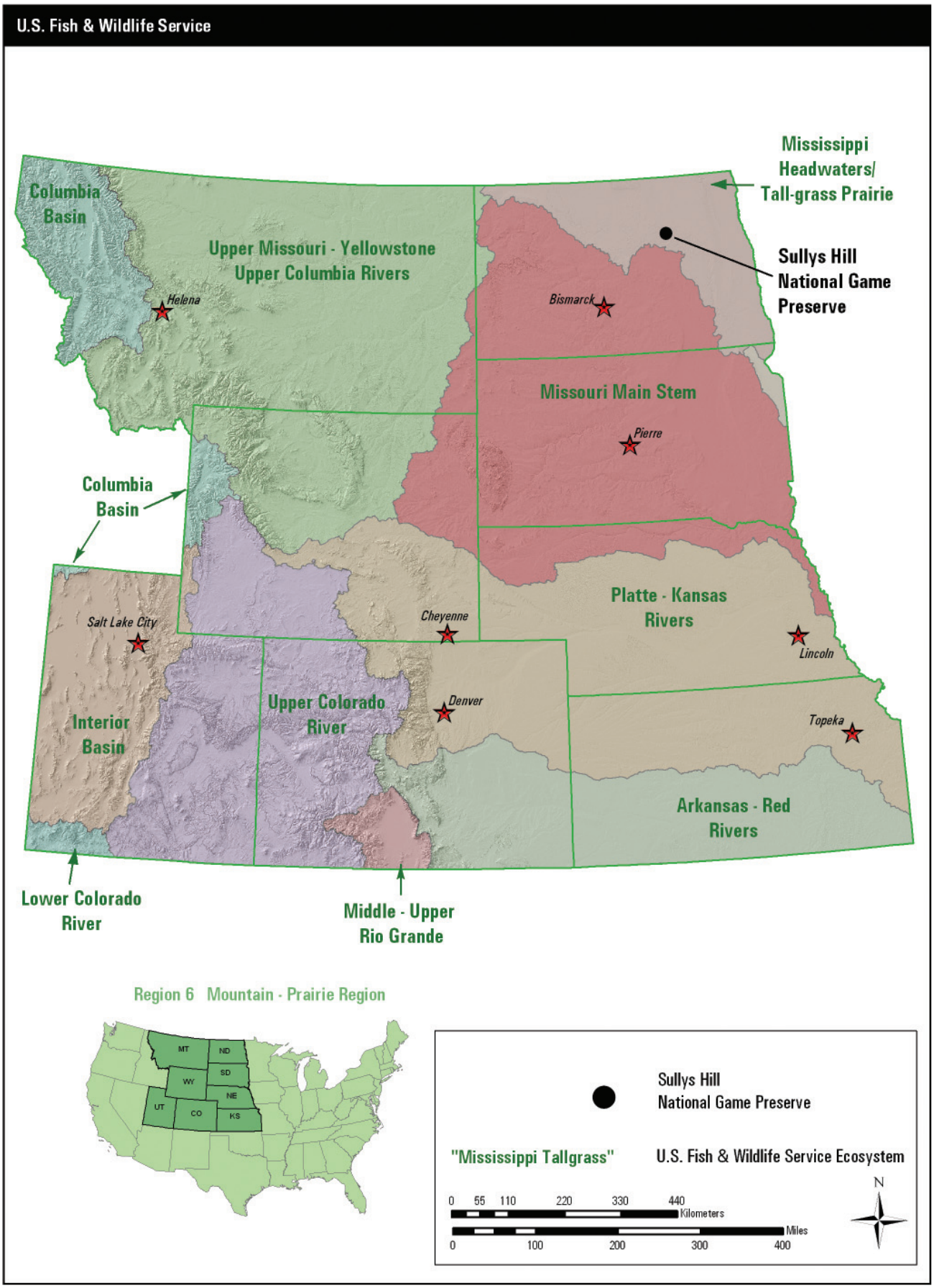

Figure 3. Missouri Main Stem River ecosystem map.

multipurpose reservoirs. As the Missouri River changed, so did the wildlife communities that depend on it. Currently, 8 species of fish, 15 species of birds, 6 species of mammals, 4 species of reptiles, 6 species of insects, 4 species of mollusks, and 7 species of plants native to the ecosystem are listed as either threatened or endangered, or are under status review for possible listing.

Vision: A healthy Missouri River capable of self-sustaining fish and wildlife resources.

Native Prairie

Threats: Native prairie in the Missouri Main Stem River Ecosystem consists of tall-grass, mid-grass, and short-grass prairies. Although the plant and wildlife species differ across the gradation from tall- to short-grass prairie, the threats and issues remain the same—conversion of prairie for other uses. The western river area of North Dakota has lost approximately 60% of the original 34 million acres of native prairie due to conversion to agricultural use.

Vision: Protect, restore, and maintain ecosystem native prairie and other grasslands ecosystems to ensure diversity and an abundance of native flora and fauna.

Riparian Areas

Threats: Riparian areas make up a small portion of the habitat in the Hudson Bay (Missouri Main Stem River) ecosystem. However, riparian and riverine wetland habitats are more important than other focus areas to fish and wildlife resources—migratory birds, threatened and endangered species, native fish, rare and declining fisheries, amphibians, and many mammals. Riparian habitats provide for much of the biodiversity in the ecosystem. Many of the species occurring in the ecosystem would be eliminated without healthy riparian areas. Sedimentation, contamination, invasive species, and development threaten the health of this diverse habitat.

Vision: Healthy riparian and floodplain ecosystems that provide an abundance and diversity of indigenous flora and fauna.

Refuge Relationship

Native plant species found in the refuge's mixed-grass prairie habitat is declining due to extensive infestation of invasive plants.

1.6 PLANNING PROCESS

This draft CCP and EA for Sullys Hill National Game Preserve are intended to comply with the Improvement Act, NEPA, and the implementing regulations of both acts. The Service issued its Refuge System planning policy in 2000, which established requirements and guidance for refuge and district plans—including CCPs and step-down management plans—to ensure that planning efforts comply with the Improvement Act. The planning policy identified several steps of the CCP and environmental analysis process (see figure 4, steps in the planning process).

Table 1 lists the specific steps in the planning process to date for the preparation of this draft CCP and EA.

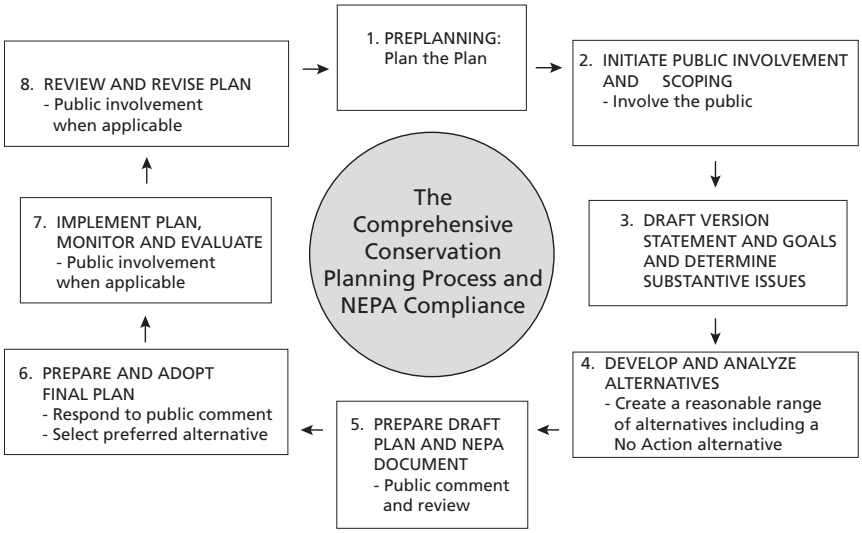

Figure 4. Steps in the planning process.

Table 1. Planning process summary and timeline for Sullys Hill National Game Preserve.

Date	*Event*	*Outcome*
June 23, 2005	Forest management review.	Forest management program review with the ND Forest Service, NRCS, and Service staff.
January 26, 2006	Kickoff meeting.	CCP overview developed; planning team list finalized; purposes identified; initial issues and qualities list developed; development of mailing list initiated.
January 26, 2006	Kickoff meeting.	Issues and qualities list updated; biological and mapping needs identified; public scoping planned.
May 1, 2006	Vision statement developed.	Worked with team members, including the NDGF, to develop first draft of vision statement for CCP.
May 23, 2006	NOI published.	NOI published in Federal Register initiating public scoping.
June 8, 2006	Planning update mailed.	First planning update sent to mailing list describing planning process and announcing upcoming public scoping meeting.
June 15, 2006	Focus group meeting (woodland birds).	Discussed woodland bird habitat needs and impacts of grazing by bison (Service nongame biologists).
June 17, 2006	Sullys Hill National Game Preserve Annual Birding Festival.	Presentations and displays reach over 1,200 attendees at the annual birding festival.
June 29, 2006	Public meeting, Sullys Hill National Game Preserve visitor center.	Public opportunity offered to learn about the CCP and provide comments.
August 1, 2006	Public scoping ends.	All public scoping comments were due. Comments were compiled for consideration by planning team.
August 1, 2006	Focus group meeting (disease control/ grazing).	Discussed ungulate grazing and disease control (Service, NRCS, and UND researchers).
August 23, 2006	Focus group meeting (disease control).	Discussed fenced animal disease issues with North Dakota Board of Animal Health.
August 29, 2006	Meeting with Spirit Lake Nation tribal council.	Presented CCP process and potential partnership proposals to Spirit Lake Nation tribal council members and chairwoman.
August 30–31, 2006	Vision and goals workshop.	Fine-tuned initial vision statement and developed goals to support it.

Table 1. Planning process summary and timeline for Sullys Hill National Game Preserve.

Date	*Event*	*Outcome*
September 20, 2006	Focus group meeting (visitor services).	Visitor Services Program experts from the USFWS and tribal members reviewed the current refuge program.
September 21–22, 2006	Alternatives workshop.	Alternatives table developed.
January 17–18, 2007	Objectives and strategies workshop.	Finalized alternatives table and began writing objectives/strategies for the proposed action.
February 2007–June 2007	Prepare draft plan.	Planning team prepared draft CCP/draft EA.
March 18–April 2, 2008	Internal review.	Draft CCP reviewed by other Service divisions along with interested state and tribal agencies.

A notice of intent (NOI) to prepare the draft CCP and EA was published in the "Federal Register" on May 23, 2006; this date also initiated the public scoping process. Scoping was announced to the public through news releases, and a public scoping meeting was held on June 29, 2006. The public scoping period was closed August 1, 2006.

At this same time, the first planning update was distributed. Over the course of pre-planning and public scoping, the planning team collected available information about the resources of the refuge and the surrounding areas. Chapter 4 summarizes this information.

Scott Ralston/USFWS

Visitors enjoying one of several presentations given at the annual Birding and Nature Festival.

Coordination With The Public

A mailing list was prepared during the preplanning phase. The list includes more than 320 names of private citizens; local, regional, and state government representatives and legislators; other federal agencies; and interested organizations, A summary of the nongovernmental, state, and federal organizations who participated in public involvement is in appendix C.

The first planning update issue was sent to everyone on the mailing list in June 2006. Information was provided on the history of the refuge and the CCP process, along with an invitation to the public scoping meeting. Each planning update included a comment form and postage-paid envelope to give the public an opportunity to provide written comments. Comments via email were also accepted at the refuge's email address.

Presentations about the CCP process were made during all public activities including the refuge annual birding festival, attended by over 1,200 individuals.

The public scoping meeting was held on June 29, 2006 at the refuge visitor center. There were 10 attendees including local citizens, local teachers, and members of the Spirit Lake Nation. After a presentation about the refuge and an overview of the CCP and NEPA process, attendees met with presenters to ask questions and offer comments. Each attendee was given a written comment form to submit additional thoughts or questions.

All written comments were due August 1, 2006. A total of 183 written comments were received throughout the scoping process. All comments were reviewed by the planning team and considered throughout the planning process.

State Coordination

The Service's region 6 director sent an invitation letter in April 2006 to the director of NDGF requesting the department's participation in the CCP process. Several representatives from the NDGF have participated in the planning process. Local NDGF wildlife managers and the refuge staff maintain excellent, ongoing working relations that preceded the start of the CCP process.

The NDGF's mission is to "protect, conserve, and enhance fish and wildlife populations and their habitats for sustained public consumptive and nonconsumptive uses." The NDGF is responsible for managing natural resource lands owned by the state, in addition to enforcement responsibilities for the state's migratory birds and endangered species. The state manages over 78,000 acres in support of wildlife, recreation, and fisheries.

Tribal Coordination

The Spirit Lake Tribal Council was sent a written invitation in April 2006 to participate in the CCP planning process. The Spirit Lake Nation Reservation surrounds the refuge boundary on three sides. Although no initial response was received, tribal members did attend the public scoping meeting. At that time another meeting was proposed for the tribal council meeting in August.

On August 28, 2006, the tribal chairwoman and 11 other members of the tribe, including 3 council members and tribal planning staff, met with refuge staff and the planning team leader at the Sullys Hill National Game Preserve Education and Visitor Center (visitor center). A presentation on the CCP process and a separate presentation outlining common goals and interests between the refuge and the tribe were presented. The tribe also attended the visitor services workshop held the following month. Their insights were valuable and all comments were considered during development of alternatives. In particular, the refuge staff recognized several opportunities to further incorporate the tribe's history and culture into future visitor services programs.

Results Of Scoping

Table 1 and appendix C summarize all scoping activities. Comments collected from scoping meetings and correspondence, including comment forms, were used in the development of a final list of issues to be addressed in this draft CCP and EA.

The Service determined which alternatives could best address the issues. The planning process ensured that issues with the greatest potential effect on the refuge would be resolved or given priority over the life of the final CCP. These issues are summarized in chapter 2.

In addition, the Service considered suggested changes to current refuge management presented by the public and other groups.