



Republicans for Environmental Protection

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Comments on the Arctic National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Impact Statement

Thank you for the opportunity to provide comments on the revised Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP) and Draft Environmental Impact Statement (DEIS).

As we celebrate the 50th anniversary of President Eisenhower's decision to set aside the Arctic National Wildlife Range, this planning process affords us an opportunity to continue and enhance that legacy by safeguarding the Refuge's defining attribute—its wilderness character.

Republicans for Environmental Protection (REP), a national grassroots organization of Republicans that has been working for years to safeguard the Arctic Refuge, strongly supports **Alternative E** as its preferred Alternative. REP believes that it is important that all of the wilderness quality lands in the Refuge be protected in accordance with the Refuge's established purpose of preserving its wildlife, wilderness and recreation values.

In reading the DEIS, it is clear that all three Wilderness Study Areas (WSAs) meet the Wilderness Act criteria for designation and that Alternative E would best meet refuge purposes and the mission of the overall Refuge System.

We agree with the DEIS that wilderness designation for the three WSAs, which are critical to the integrity of the Refuge, would:

"...provide the greatest assurance that...[the Coastal Plain, Brooks Range and Porcupine Plateau areas]...would remain unaltered and essentially free of the intent

to control or manipulate the land, its creatures, and natural processes, thereby ensuring the area retains its ecological integrity now and for future generations.”

This is particularly true given that some in Congress have begun interpreting agency decisions to not recommend WSAs to the President (and subsequently Congress) for designation as equivalent to a determination that the lands are not suitable for future wilderness protection.

Given this new lens of interpretation by lawmakers and wilderness opponents, the selection of an Alternative that fails to recommend these areas for Wilderness designation would likely jeopardize the agency’s ability to safeguard the wilderness character of these lands in the future. Alternative E is the only Alternative that would clearly acknowledge the wilderness values of these WSAs and avoid facilitating the false perception that they do not merit designation.

REP believes that the only action consistent with the findings of the agency’s wilderness review process—that all three WSAs meet the Wilderness Act criteria for designation—is a recommendation for designation. Any other decision would also seem to be inconsistent with the Refuge’s established purpose and the agency’s established planning goal that “the Refuge retains its exceptional wilderness values without loss of natural condition and wild character.”

We believe that Alternative E is the only Alternative that is adequately protective of wilderness, meets the Refuge’s purpose, and is consistent with the original vision for the Refuge by Olaus and Mardy Murie.

We offer the following thoughts on various aspects of the plan and future management of the Refuge:

Special Values of Arctic Refuge

REP supports the Special Values of the Arctic Refuge as they appear in the Draft CCP (Pages 1-20 to 1-22). The Final CCP should retain this section as it exists and require that the Special Values of the Refuge are used to guide all management decisions for the Refuge.

Wilderness Recommendations

We fully support recommending the Brooks Range, Porcupine Plateau, and Coastal Plain Wilderness Study Areas for designation as Wilderness under the Wilderness Act and forwarding those recommendations to the President for submission to Congress.

Wild & Scenic Rivers

We fully support recommending the Atigun, Hulahula, Kongakut, and Marsh Fork Canning rivers for designation as Wild Rivers under the Wild and Scenic Rivers Act.

We also encourage the agency to review its management of the Ivishak, upper Sheenjek and Wind rivers within the boundaries of the Arctic Refuge that were designated as wild rivers in Section 602 of ANILCA, and address current and future agency efforts to maintain the outstanding values associated with these three Wild Rivers.

Visitor Use

We support the commitment in Alternative E for the agency to address visitor use and wilderness stewardship issues. The final CCP should include a strong commitment to restore wilderness character in areas throughout the Refuge that have had those values reduced by visitor use impacts.

We are concerned that the schedule provided on pages 6-3 to 6-6 indicates that the wilderness stewardship and visitor use management plans would not be completed until 8 or 10 years from now. Given the presence of a number of known and long standing problems with wilderness degradation associated with public use, it would seem prudent to address these issues as soon as possible.

We fully support the prohibition of off-road vehicle use and helicopter use within the Refuge.

Wildlife Management

We fully support Management Guideline 2.4.11 and its commitment to “leave habitats unaltered and unmanipulated” so that the natural processes are allowed to continue and to not modify or improve habitats to favor one species over another. This guideline should be retained in the final CCP.

We also fully agree with the language in Guideline 2.4.12 that states Refuge management’s focus should be “on enabling the natural behavior, interactions, and cycles of all native species to continue, with little or no human intervention and manipulation.” This is essential for wildlife management to be consistent with Refuge mission and purpose.

The Draft CCP, in recognizing the need to coordinate with the Alaska Department of Fish and Game, fails to acknowledge that some state goals for managing wildlife—such as predator control and “intensive management”—clearly conflict with the Arctic Refuge’s purpose and FWS management goals. Management Goal 1 of the CCP reads:

Ecological processes shape the Refuge, and its management remains essentially free of the intent to alter the natural order, including natural population densities and dynamics, and levels of variation of native fish, wildlife, and plants.

The Final CCP must clearly indicate that when in conflict with state goals, wilderness values, Refuge purposes, and federal management goals must prevail.

In such cases, the FWS must exercise its responsibility to preempt the state fish and game department and its Boards of Game and Fish.

The Final CCP must ensure that Refuge purposes will never be compromised by State decisions to authorize predator control or habitat manipulation to increase game species for hunting. We recommend that language in the Final CCP be clear that refuge purposes have supremacy over the state of Alaska's wildlife management objectives.

REP also believes that big game/trophy hunting for sport (as opposed to subsistence), which typically involves commercial services, is inconsistent with the Refuge purpose and the management goals stated in the CCP. Any hunting allowed in the Refuge should be carefully monitored and undertaken to the highest standard of sportsmanship. Fair-chase principles must be required and the spotting of game from airplanes should be prohibited,

Climate Change

REP supports the agency's commitment to addressing climate change as part of this planning process and in future management of the refuge.

Oil and Gas Development

Oil and gas exploration and drilling are **not** compatible with the purpose and vision of the Refuge and FWS was correct in its decision to not consider an oil and gas alternative.

The vast web of pipelines and other infrastructure needed to extract oil and gas from the Refuge would industrialize and forever alter the landscape. Beyond that, persistent problems with pipeline corrosion would subject the refuge to a risk of oil spills in very remote locations.

Oil and gas activities and infrastructure adjacent to the Refuge, both onshore and offshore, pose significant threats to the integrity of Arctic fish and wildlife populations and habitats, subsistence resources and recreational opportunities. These activities and their impacts underscore the importance of the Arctic Refuge serving as just that—a refuge that provides the necessary balance envisioned by the Eisenhower Administration when it established the Arctic National Wildlife Range.

We urge the FWS to monitor the impacts that oil and gas activities outside the Refuge boundaries have on the Refuge, its wildlife populations, and the importance of its habitat to arctic wildlife populations.

Refuge Purposes

REP is concerned about a statement in the CCP implying that the purposes for which the original Arctic National Wildlife Range was established only apply to those

lands in the original Arctic Range: "Under Section 305 of ANILCA, the Range's original wildlife, wilderness, and recreation purposes still apply to those lands in the former Range" (DEIS at 1-18). Under FWS's own longstanding policy and guidance regarding determining the purpose of each refuge in the National Wildlife Refuge System, see FWS Refuge Management Part 601 National Wildlife Refuge System, 601 FW 1 at 1.16 (July 26, 2006), the purposes of the original Arctic Range—namely "to preserve unique wildlife, wilderness, and recreational values" apply to *all* Arctic Refuge lands.

Conclusion

REP commends the USFWS for its scoping process and for including a proper range of alternatives.

There is no place comparable to the Arctic National Wildlife Refuge anywhere in America. It is a unique confluence of wildlife, wilderness and scenic values that warrants the highest levels of protection as the "crown jewel" of America's National Wildlife Refuge System. We strongly urge the Fish & Wildlife Service to adopt Alternative E and provide the necessary protections for this one-of-a-kind natural treasure.

Thank you again for providing the opportunity to comment on the Arctic Refuge Plan. We look forward to the release of the Final CCP/EIS and trust that it will provide the leadership and management direction required to safeguard this special landscape and its wildlife for the benefit of present and future generations.

Sincerely,

A handwritten signature in blue ink that reads "David E. Jenkins". The signature is written in a cursive, flowing style.

David E. Jenkins
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