

November 14, 2011

U.S. Fish and Wildlife Service  
Arctic NWR – Sharon Seim  
101 12<sup>th</sup> Ave, Rm 236  
Fairbanks, AK 99701-6237



**Comments on the Fish and Wildlife Service Arctic National Wildlife Refuge (ANWR) draft Comprehensive Conservation Plan (CCP) and draft Environmental Impact Statement (EIS)**

American Forests is the oldest national non-profit conservation organization in the country; protecting and restoring urban and rural forests since 1875. We have served as a catalyst for many of the most important milestones in the conservation movement, including the founding of the U.S. Forest Service, the national forest and national park systems, and thousands of forest ecosystem restoration projects and public education efforts. Since 1990, American Forests has planted nearly 40 million trees in forests throughout the U.S. and beyond, resulting in cleaner air and drinking water, restored habitat for wildlife and fish, and the removal of millions of tons of carbon dioxide from the atmosphere.

The mission of our organization is to protect and restore forests in order to help preserve the health of our planet for the benefit of its inhabitants. We envision a world in which forests are thriving and valued for their significant environmental, societal, and economic benefits. American Forests cares about places like ANWR that provide wildlife habitat, wilderness areas, and recreational opportunities and support the U.S. Fish and Wildlife Service's (FWS) draft management plans to protect and restore plant and wildlife habitat in ANWR. This refuge is well known for its rich abundance of wildlife, and in order to provide adequate habitat for those species, we need to care for the boreal forests that are at the foundation of this arctic ecosystem.

In 1980, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA), adding 9.2 million acres to the Arctic Range, designated 8 million acres as wilderness, designated three wild rivers, and changed its name to the Arctic National Wildlife Refuge. ANILCA also added new purposes, complementary to its original purposes, pertaining to the entire Refuge. Section 101(b) of ANILCA summarizes the general intent of all conservation system units in Alaska by stating:

*It is the intent of Congress in this Act to preserve unrivaled scenic and geological values associated with natural landscapes; to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems; to protect the resources related to subsistence needs; to protect and preserve historic and archeological sites, rivers, and lands, and to preserve wilderness resource values and related recreational opportunities, including but not limited to hiking, canoeing, fishing, and sport hunting, within large arctic and subarctic wild lands and on free-flowing rivers; and to maintain opportunities for scientific research and undisturbed ecosystems.*

**Issue 1. The Brooks Range, Porcupine Plateau, and the Coastal Plain Wilderness Study areas should all be recommended for Wilderness designation.**

The northern boreal forest, or taiga, an area dominated by forests, peatlands, and water, is one of the largest and youngest biomes in the world. Its trees and peatlands comprise one of the world's largest "carbon reservoirs" and ANWR plays a significant role in the health of the entire ecosystem. While vast areas of Canada's and Russia's boreal forests have been extensively logged, the United States recognized the ecological and societal importance of the Arctic Refuge. By creating it in 1960, and expanding it in 1980, Congress ensured that the ecosystem remains a viable, functioning preservation.

Wildlife played an important role in the establishment of the Arctic Refuge. A purpose of the Arctic Refuge identified by the ANILCA legislation was to conserve mammal populations and their habitats, including caribou, polar bears, grizzly bears, muskoxen,

Dall's sheep, wolves, and wolverines. In order to protect ANWR's wildlife, it is essential for the boreal forests to receive adequate protection. These boreal forests are home to hundreds of wildlife species in Alaska and Canada including caribou, polar bears, and wolverines.

The interconnectedness of the ecology of these three regions, and the reliance on each area by the wildlife populations, requires that all three be designated as wilderness. For example, the Porcupine caribou herd, an iconic representation of ANWR itself, uses all three areas. As stated in the Draft CCP, the Porcupine caribou herd ranges over 130,000 square miles of wild lands in northeastern Alaska and northwestern Canada. The entire Arctic Refuge Coastal Plain is key calving and post-calving habitat for Porcupine caribou. Foothills and mountains of Arctic Refuge are also important summer, fall, and winter habitats, as well as spring and fall migration routes. The Porcupine caribou herd generally overwinters south of the Brooks Range in Arctic Refuge and in the Richardson and Ogilvie mountains of the Yukon Territory, Canada. If ANWR had the singular goal of protecting the Porcupine herd, it would require all three areas be designated as wilderness. And yet, hundreds of other species use both the coastal plain and the forests as habitat.

Currently, to ensure the Arctic Refuge's goals and objectives are being fulfilled; a majority of the proposed areas are already managed under the "Minimal Management" policy. Minimal Management is designed to maintain the refuge environment with minimal or no evidence of human modifications or changes. Habitats are allowed to change and function through ecological processes. Administration will ensure that the resource values and environmental characteristics identified in a refuge comprehensive conservation plan are conserved. Public uses, economic activities or uses, and facilities should minimize disturbance to habitats and resources. Ground-disturbing activities are to be avoided whenever possible. However, only true Wilderness designation will provide the protection these areas deserve. One area cannot be adequately protected without protecting the others. Therefore, American Forests recommends that Alternative E, the only alternative to designate all three areas as wilderness, be selected by the Fish and Wildlife Service in the Final Comprehensive Conservation Plan for the Arctic National Wildlife Refuge.

## **Issue 2. Additional Wild and Scenic Rivers should be recommended for inclusion in the National Wild and Scenic River System.**

The ecological linkages between water and forests represent the intricate interdependence of our ecosystems and our resources. Forests play an integral role in the hydrological cycle by affecting the rates of transpiration and evaporation, and influencing how water is routed and stored in watersheds. It is in maintaining high water quality that forests make their most significant contribution to the hydrological characteristics of watershed ecosystems. This is achieved through minimization of soil erosion on site, reduction of sediment in water bodies (wetlands, ponds, lakes, streams, rivers) and trapping or filtering of other water pollutants in the forest litter, particularly through the following mechanisms. To ensure healthy rivers, healthy forests must be in place.

The Wild and Scenic Rivers Act was enacted by Congress in 1968 with the realization that, *“the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.”* Rivers that fall under this designation have to meet criteria of *“existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway”* and possessing at least one of the outstandingly remarkable values. The four rivers indicated in Alternative E all meet the criteria for Wild and Scenic designation as they possess at least one outstandingly remarkable values: scenic, recreational, geologic, fish, wildlife, historic, cultural, or other. In fact, these rivers possess numerous, if not all the outstanding remarkable values necessary for such designation.

Protecting the forests without additional protection for the rivers, and vice versa, is not responsible stewardship. The interdependence between forests and rivers means extending the highest protection for them all. With the designation of the Atigun, Hulahula, Kongakut, and Marsh Fork Canning rivers as Wild and Scenic Rivers, the Fish and Wildlife Service is helping to ensure protection of river segments for the “benefit and enjoyment of present and future generations.”

### **Issue 3. The Refuge should manage Kongakut River visitor use to protect resources and visitor experience.**

As the draft CCP notes, the Arctic Refuge is renowned for the opportunities it provides for adventure, exploration, independence, and solitude. Whether visitors come to hunt, view, or photograph wildlife, for the challenge of an arduous backpacking trek or river float, or just to enjoy the area's stark beauty from the comfort of a base camp, they can find themselves immersed in a world apart, free from the distractions of modern civilization. The Refuge remains a place where a sense of adventure, mystery, and discovery still prevails.

Since its inception in 1875, American Forests has recognized the recreational, spiritual, and societal benefits forests have to offer. The importance of people connecting to nature is a base value and one the National Forest System, Park Service, and Wildlife Refuges is organized around. American Forests supports the America's Great Outdoors (AGO) Initiative and the President's commitment to develop an up-to-date conservation and recreation agenda. The AGO's goal of reconnecting people with the outdoors aligns with the protection of ANWR as well as the FWS "Let's Go Outside" campaign. Wildlife refuges like ANWR are essential in preserving America's wilderness and fostering a sense of stewardship and pride in our land.

American Forests supports the public recreation activities that are compatible with refuge purposes to "preserve unique recreation values." The standard of "Leave No Trace" is the appropriate standard of management for both public and agency activities. American Forests also supports the Agency taking further steps, should voluntary methods fail. Regulating use and access of commercial guiding and outfitting, when necessary is appropriate when warranted. So long as the Refuge continues to actively communicate and work with local communities and advisory groups to address subsistence issues and concerns and participate in Federal and State regulatory processes to provide the opportunity for continued subsistence uses essential to Native and non-Native physical, economic, traditional, and cultural and/or social existence.

Alternative E, which is the same as Alternative D in regards to visitor use, is by far the optimal alternative. The increased efforts to educate the public about compliance and enforcing the compliance of Special Use Permits, as well as redistributing the number of groups on the river during heavy use periods, and working with commercial outfitters to ensure such distribution will ensure the goals and objectives of the Arctic Refuge are met.

In conclusion, in order to fulfill the Arctic Refuge Vision, Alternative E must be the choice for the Final Comprehensive Conservation Plan. *This untamed arctic landscape continues to sustain the ecological diversity and special values that inspired the Refuge's establishment.*

*Natural processes continue and traditional cultures thrive with the seasons and changing times; physical and mental challenges test our bodies, minds and spirit; and we honor the land, the wildlife and the native people with respect and restraint. Through responsible stewardship this vast wilderness is passed on, undiminished, to future generations.* American Forests supports the Fish and Wildlife Service in proposing Wilderness designation for the Brooks Range, Porcupine Plateau, and Coastal Plain Wilderness Study Areas. American Forests also supports the proposed designation of Wild and Scenic River status for the Atigun, Hulahula, Kongakut, and Marsh Fork Canning rivers. Increased education and enforcing compliance of Special Use Permits is the best way to provide the recreational activities promised in the Arctic Refuge mission. If you have further questions, please contact me.

Thank you for the opportunity to provide these comments.



Rebecca R. Turner, Esq.  
Director of Public Policy  
American Forests