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September 11, 2007

Mike Spindler  
Refuge Manager  
Kanuti National Wildlife Refuge  
101 12<sup>th</sup> Ave. Rm 262  
Fairbanks, AK 99701

Re: *Public Comments on Draft Revised CCP & EA Kanuti National Wildlife Refuge*

Dear Mike,

Please accept the following comments on behalf of the Alaska Chapter of Wilderness Watch, a non-profit conservation organization dedicated to advocating for appropriate stewardship of our nation's National Wilderness Preservation System.

Given that the revised plan will guide refuge stewardship for the next 15 years or more, it is imperative that the Fish and Wildlife Service develops an appropriate final plan that will achieve the various purposes, missions and legal mandates presented in the beginning sections of this draft. We hope you will seriously consider and implement our following comments which we believe are essential for a successful plan.

*Planning Context* (1.2 page 1-4) The draft fails to present the over-arching purposes of the Alaska National Interest Lands Conservation Act (ANILCA) which according to (Section 101) are to:

*“preserve unrivaled scenic and geological values associated with natural landscapes... maintenance of sound populations of wildlife... dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest and coastal rainforest ecosystems...to preserve wilderness resource values and related recreational opportunities ... within large arctic and subarctic wildlands and on freeflowing rivers and to maintain opportunities for scientific research and undisturbed ecosystems.”* (emphasis added)

It was in this context that Kanuti National Wildlife Refuge was created and within which it must be administered, and around which the revised plan should developed.

We believe this historic context is vital for a successful plan and urge that the final plan include ANILCA purposes.

*Refuge Vision:* It is stated that the refuge will be managed for its “natural unaltered character, biological integrity, and scientific values as driven by biological and physical processes throughout time ...” however, there are several aspects of the plan that contradict that noble vision. For example, Alternative C (the preferred alternative) places a significant portion of the refuge under “Moderate Management” where actions such as: sale of sand and gravel, improved sites docking float planes, bunkhouses, all weather roads, constructed airstrips and off road vehicles among other things may be allowed. Of the alternatives offered in the draft plan, Alternative B (Minimal Management for all refuge lands) is most consistent with the stated refuge vision. We urge the Service to adopt Alternative B for the final plan.

*Historical Perspective (1.5.1 page 1-10):* As drafted this section presents only a historic fact, not a perspective. An appropriate perspective would briefly describe the historic national movement which led to passage of ANILCA. It would tell how people from all over the country realized that the wild landscapes of Alaska were becoming vulnerable to threats such as mining, oil and gas development, logging, road building, commercial tourism and land disposals, and that Congressional action was necessary to preserve for all time, the most important areas in their natural condition as National Parks, Wildlife Refuges, Wilderness Areas, Wild Rivers and Conservation Areas. These citizens also realized that in Alaska there was still a chance to avoid the land use mistakes that had been made in the other states where wild areas have been destroyed or greatly compromised by human occupation and development. It is in this context that the revised draft plan for Kanuti Refuge should be presented.

*Alternatives and Actions Considered but Eliminated from Detailed Study (2.4 page 2-2):* The draft does not reveal what the State of Alaska’s concerns were that caused the Service to eliminate detailed consideration and alternatives for recommendations of rivers and lands for inclusion in the National Wild and Scenic Rivers Systems and National Wilderness Preservation System. The public deserves to know what these concerns were and how the Service arrived at a decision to eliminate such items of high public interest. The Kanuti Refuge is a National asset belonging to all Americans, not the State of Alaska.

Section 1317 of ANILCA requires a review of all lands not already designated as Wilderness to be reviewed (in accordance with section 3(d) of the Wilderness Act) as to their suitability for preservation as wilderness. It is our understanding that reviews conducted during the first CCP process were inappropriately restricted (see GAO Report 89-155 Alaska Wildlife Refuges: Restrictive Criteria Used to

Recommend Additional Wilderness). So far the Secretary has failed to forward 1317 wilderness recommendations. We urge that the Service conduct proper wilderness reviews as required by Section 1317 of ANILCA, and incorporate results in the final Kanuti plan. Also we disagree with the finding in the draft that (page 2-2) “Current and proposed management direction may provide adequate protection for wilderness values.” There is no substitute for protection by law (Wilderness Act of 1964) of the wilderness values of Kanuti Refuge.

*Fire Management* (pages 2-3 and 2-4): We are very concerned that the refuge fire management plan was recently changed (apparently with little or no public involvement) from “limited” to “modified” categories of fire suppression for some 290,000 acres of Kanuti Refuge. This also appears to contradict the refuge vision statement (“managed for natural unaltered character . . . as driven by biological and physical processes”). Wildfire in interior Alaska has functioned as a natural process shaping a diversity of habitats over vast areas and long time frames. It should be allowed to continue to function “unaltered” by refuge management and policy to the maximum extent.

*Predator Control:* It is our understanding that there is growing pressure to conduct predator control on refuge lands for the purpose of enhancing opportunities for subsistence (a purpose of the refuge). Section 302(4)(B) of ANILCA clearly established that the first and most central purpose of the refuge is to conserve wildlife “in their natural diversity” (which includes natural predator and prey dynamics), and that other purposes such as the opportunity for subsistence, must be consistent with natural diversity. We believe it would be helpful if the final plan acknowledge this relationship of refuge purposes up front in Section 2.5.3 rather than only at the end of the document in Appendix N.

*ATV use for subsistence or recreation:* We are pleased to see that Appendix K presents results of oral history interviews regarding traditional transportation methods used on Kanuti Refuge lands. According to these results there is no evidence of ATV’s being used on refuge lands in the past, and therefore, such uses can not be considered traditional under ANILCA access provisions. We are very concerned about the damage ATV use would have on refuge resources and urge that the final plan prohibit the use of ATV’s on all refuge lands.

In summary, we support the refuge vision statement, however are concerned about the many contradictions that exist in the draft plan. Natural processes should be allowed to continue, unaltered by human intervention. We support Alternative B, however, designation of the refuge as Wilderness would be the best way to assure that its very special but sensitive values will be protected.

Thank you for the opportunity to comment.

Sincerely,

Fran Mauer  
Wilderness Watch Alaska Chapter Representative