November 15, 2011

The Honorable Ken Salazar  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

RE: Comments on the Draft Comprehensive Conservation Plan/Environmental Impact Statement for the Arctic National Wildlife Refuge

Dear Secretary Salazar:

Thank you for the opportunity to comment on the Draft Comprehensive Conservation Plan/Environmental Impact Statement (Draft CCP/EIS) for the Arctic National Wildlife Refuge. On behalf of the above 211 groups and the millions of members we represent, we urge the U.S. Fish and Wildlife Service (FWS) to select Alternative C because it recommends Wilderness designation for the Arctic Refuge’s incomparable Coastal Plain Wilderness Study Area.

The Arctic National Wildlife Refuge was set aside fifty years ago for its “unique wildlife, wilderness, and recreational values.” This unparalleled landscape, and particularly its Coastal Plain, is home to some of America’s most iconic wildlife, including polar bears, grizzly bears, muskoxen, caribou, and hundreds of thousands of birds that gather each year from around the globe. Additionally, the Gwich’in people who have lived in this region for thousands of years rely on the Porcupine caribou herd, whose calving and nursery grounds are in the Arctic Refuge’s Coastal Plain.

We appreciate that the FWS conducted a full wilderness review of all Arctic Refuge lands not already designated Wilderness. This updated study clearly identifies the wilderness values of virtually all Arctic Refuge lands. For the vital Coastal Plain Wilderness Study Area (WSA), the Draft CCP/EIS states: “This WSA is the most biologically productive part of the Refuge and contains important habitats for a great diversity and abundance of life…The WSA’s ecological integrity enables all native species to maintain their natural behavior, interactions, cycles, and ecological roles.” With this area’s biological importance established yet again, we believe the appropriate next step is to recommend Wilderness designation for the Coastal Plain WSA. For the Brooks Range and Porcupine Plateau Wilderness Study Areas, we encourage FWS to manage them in a manner that maintains their wilderness values while allowing the Gwich’in people to meet their traditional and cultural needs.

We support the Arctic Refuge vision statement articulated in the Draft CCP/EIS, which recognizes the “Special Values” of the Refuge, and the restraint needed to maintain those values into the future. We also support the nine goals outlined in the Draft CCP/EIS, which include protecting the Refuge’s wildlife, wilderness qualities, natural ecological processes, subsistence
opportunities, and wilderness-related recreational opportunities, while also addressing climate change.

Oil and gas leasing, exploration, development, and production, including seismic activity, support infrastructure or any geological surveys, are entirely incompatible with Refuge purposes, and would permanently harm the values for which the Arctic Refuge was established. Any such activities should continue to be prohibited, and should not be included in any Refuge management policies. FWS correctly did not include any alternatives considering oil and gas exploration and development as it is not a refuge purpose. Further, as climate change continues to impact the Arctic region, exacerbating those effects through oil and gas development is unconscionable. The Refuge’s value as an intact ecosystem becomes increasingly important each year.

To conclude, the Arctic National Wildlife Refuge is an incredible landscape with values unlike any other public lands in our nation. Its wilderness, ecological integrity, wildlife, adventure-oriented recreational opportunities, and Alaska Native cultural and subsistence values are unmatched. FWS should maintain the Refuge’s Special Values by adopting the Vision and Goals outlined in the Draft CCP/EIS. Further, we urge FWS to recommend Wilderness designation for the crucial Coastal Plain WSA (Alternative C), and to manage the rest of the Refuge in a manner that maintains Wilderness characteristics while supporting the Gwich’in people’s traditional and cultural access to the area.

We appreciate your consideration of our comments on the Draft CCP/EIS for the Arctic National Wildlife Refuge.

Sincerely,

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Montie Jones, United Methodist Clergy
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<th>Executive Director</th>
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<td>Serpentine Art and Nature Commons, Inc.</td>
<td>George Bramwell, Esq.</td>
<td>Staten Island, New York</td>
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<td>Sierra Club</td>
<td>Michael Brune, Executive</td>
<td>San Francisco, California</td>
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<td>Beverly Minn, Owner</td>
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<td>Ben Gregg, Executive</td>
<td>Johns Island, South Carolina</td>
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<td>Rocco Murano, President</td>
<td>Brookings, South Dakota</td>
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<td>South Dakota Division of the Izaak Walton League</td>
<td>Jerry Schlekeway, President</td>
<td>Pierre, South Dakota</td>
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<td>Scott Groene, Executive</td>
<td>Moab, Utah</td>
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<td>Mitch Leachman, Executive</td>
<td>St. Louis, Missouri</td>
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<td>Susan Solterman Audette,</td>
<td>St. Paul, Minnesota</td>
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<td>Judi Hopkins, President</td>
<td>St. Petersburg, Florida</td>
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<td>Krystal Kyer, Executive</td>
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<td>John Doyal, Executive</td>
<td>Chattanooga, Tennessee</td>
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<td>Arie Hunt, President</td>
<td>Minneapolis, Minnesota</td>
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<td>Jennifer Read, President</td>
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<td>Evelyn Davis, President</td>
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<td>Andy Beerman, Owner</td>
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<td>Donna Olsen, Chair</td>
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<td>Dick Boyd, President</td>
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<td>Beth Hill, President</td>
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<td>Lisa Guthrie, Executive</td>
<td>Richmond, Virginia</td>
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<td>Virginia Wilderness Committee</td>
<td>Laura Neale, President</td>
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<td>Fairfield, Virginia</td>
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<td>Voices for Earth Justice</td>
<td>Patricia Gillis, Executive Director</td>
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<td>Waccamaw Audubon Society</td>
<td>Suzanne Senchak, President</td>
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<td>Walter J. Breckenridge Chapter of the</td>
<td>Steven H. Schaut, President</td>
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<td>Izaak Walton League of America</td>
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<td>Washington Wilderness Coalition</td>
<td>Nalani Askov, Executive Director</td>
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<td>Seattle, Washington</td>
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<td>West Virginia Highlands Conservancy</td>
<td>Cynthia Ellis, President</td>
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<td>Western Nebraska Resources Council</td>
<td>Buffalo Bruce, Staff Ecologist</td>
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<td>Chadron, Nebraska</td>
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<td>Wild Sanctuary</td>
<td>Bernie Krause, President</td>
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<td>Glen Ellen, California</td>
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<td>Wild South</td>
<td>Ben Prater, Associate Director</td>
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<td>Asheville, North Carolina</td>
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<td>Wild Things Sanctuary</td>
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<td>Ithaca, New York</td>
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<td>Wildlands Network</td>
<td>Kenyon Fields, Strategy Director</td>
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<td>Lummi Island, Washington</td>
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<td>Wildlife Alliance of Maine</td>
<td>Daryl DeJoy, Executive Director</td>
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<td>Bangor, Maine</td>
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<td>The Will Steger Foundation</td>
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<td>Minneapolis, Minnesota</td>
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<td>Wintermoon Summersun Adventures</td>
<td>Kathleen Anderson, Owner</td>
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<td>Brimson, Minnesota</td>
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<td>Wisconsin Environment</td>
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<td>Madison, Wisconsin</td>
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<td>Wisconsin League of Conservation Voters</td>
<td>Kerry Schumann, Executive Director</td>
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<td>WORDS TO GO®</td>
<td>Harriet Rhodes, Owner</td>
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<td>Greenwich, Connecticut</td>
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<td>Wyoming Conservation Voters</td>
<td>Kate Wright, Executive Director</td>
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<td>Cheyenne, Wyoming</td>
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<td>Yonder Star Christmas Shop</td>
<td>Brett Snyder, Owner</td>
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<td>Biglerville, Pennsylvania</td>
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<td>The Zygosis Speakers Foundation</td>
<td>Damon Bowen, Founder</td>
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<td>Portland, Oregon</td>
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<td>5H Consulting</td>
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<td>cc: Dan Ashe, Director, U.S. Fish and Wildlife Service</td>
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<td>cc: Richard Voss, Arctic National Wildlife Refuge Manager</td>
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