

791 Redpoll Ln
Fairbanks, Ak 99712
November 12, 2010

Richard Voss, Refuge Manager
Arctic National Wildlife Refuge
101 12th Ave. Rm 236
Fairbanks, AK 99701

Re: Wild River Review

Dear Mr. Voss:

The following comments are made on behalf of Wilderness Watch and its Alaska Chapter. We are a conservation organization organized to place special focus and advocacy towards the appropriate stewardship of our nation's National Wilderness Preservation System and National Wild and Scenic River System. Several of our Alaska Chapter members have extensive experience as travelers in the Refuge, and specifically on its many splendid rivers. Some members have long term experience in the Refuge as professional scientists, former managers and as commercial pilots and guides.

We commend you for including a review of the Refuge rivers for possible designation as Wild Rivers according to the Wild and Scenic Rivers Act within the CCP revision process. In the case of the Arctic Refuge, we are fortunate that all of its rivers are free-flowing, with natural water quality within an entirely wild landscape.

While it is not expected that all rivers in the Refuge will be found to be suitable for designation, the list of "eligible" rivers provided for our input is inappropriately truncated by the decision to forward only those rivers for which there is history of commercial use. This represents a bias towards those rivers which for what ever reason have had commercial use. Furthermore, some rivers that have a history of commercial use were not even on this very limited list. For example, the upper Middle Fork of Chandalar River has had commercial guided hunting activities for as long as this area has been in the Refuge (1980).

Limiting the eligible list to only commercial use rivers does not address other rivers that may have outstandingly remarkable values (ORV), but have not been the focus (so far) of commercial uses. For example, the Salmon Trout River which flows into the Porcupine River at Old Rampart is entirely within the Refuge, but was not considered, however, its ORV's include, scenery, fish wildlife, and history. There are many other examples similar to this one. We recommend that the list of eligible rivers be corrected to include all rivers with basic qualifying characteristics irregardless of having a history of commercial use. This complete list of eligible rivers should be presented in the draft CCP. It will be a valuable reference both for this CCP review as well as subsequent plan reviews in the future.

Our specific comments regarding your list of proposed "eligible" rivers follows:

Atigun: wildlife should be listed as an ORV because the slopes along the Gorge are important habitat for Dall sheep during fall, winter and spring. Several important mineral licks are found on steep slopes near the river. Seasonal migrations of Dall sheep cross the Atigun River along specific trail systems in the Gorge.

Canning: This is a major river in the Refuge and merits serious consideration for suitability. All branches of this river in its delta, including the Stains should be included. Additional ORV's include: history (Leffingwell), geology, and recreation.

Marsh Fork: Additional ORV's include: geology and scenery. The open, shale dominated basin of the upper Marsh Fork allows for views of unusual scenery, and provides highly nutrient soils, high plant productivity and abundant forage for wildlife such as Dall sheep.

East Fork Chandalar: Additional ORV's are: scenery and wildlife. This valley is often an important winter range for caribou.

Hulahula: Additional ORV's are: scenery, wildlife, fish and culture. Some of the tallest peaks of the Brooks Range (Chamberlain and Michelson) with associated glaciers are found here. The Hulahula valley supports one of the highest densities of Dall sheep in the entire Brooks Range. It is an exceptional wind channel area allowing for early snow melt in the spring with a corresponding longer growing season for plants and sheep forage. Several important mineral licks are found in the valley of the Hulahula. Springs provide important overwintering habitat for fish. This valley is a most important area for residents of Kaktovik for subsistence activities.

Jago: Additional ORV's: Scenery and wildlife. Tall peaks and associated glaciers. Foothills and coastal plain along the Jago lie at the center of the traditional calving grounds of the Porcupine Caribou Herd.

Kongakut: Additional ORV's: Wildlife, fish and culture. Lands along the Kongakut are heavily used by migrations of caribou during the calving and post calving seasons. Several important river crossing areas are found here. Springs provide overwintering habitat for fish especially Dolly Varden (Arctic char). Aufeis fields on the river bars provide mineral salts for Dall sheep. Old sod house sites occur along the delta coast.

Okpilak: Additional ORV's: Wildlife and culture. The foothills and coastal plain along the Okpilak are important calving and post calving habitats for the Porcupine Caribou Herd. Subsistence use occurs along the Okpilak delta area.

Neruokpuk Lakes: Additional ORV's: Recreation. The area around the lakes has been designated as a Public Use Natural Area.

Porcupine River: Additional ORV: Scenery. The ramparts of the Porcupine River provide a scenic setting for river travelers.

Recommended Additional Eligible Rivers:

Coleen: This river of significant length contains all of the basic elements to qualify as eligible for wild river status. ORV's include numerous archeological evidence of Inupiaq cultures living far to the south of the Brooks Range divide, special geological features such as Conglomerate Mountain and Bear Mountain, as well as wildlife habitat for caribou and migratory moose populations.

Aichilik: A river with several ORV's including: Scenery, wildlife (calving and migration habitat for the Porcupine Herd), important water bird habitat in the delta region, and significant recreational opportunities for long distance backpacking as well as river travel.

Sadlerochit: ORV's include: geology (Fire creek canyon), perennial springs with unique plant communities, and fish and wildlife habitats. Consideration should be to include this watershed with Neuruokpuk Lakes.

Katakturuk: This river begins south of the Sadlerochit Mountains, and flows through them by way of a narrow, scenic canyon. ORV's include scenery, geology, wildlife (calving habitat for the Porcupine Herd and summer range for the Central Arctic herd), and also important fish habitat.

Okerokovik: This north slope river watershed begins in the northern foothills of the Brooks Range, and includes characteristics different than most of the prominent rivers having headwaters at the continental divide. ORV's included: wildlife (calving and post calving habitat for the Porcupine Herd), springs and a large spring and aufeis field.

Saganavirktok and upper tributaries: All of these rivers begin deep in the Brooks Range and have significant scenic values and wildlife habitats for caribou, Dall sheep, moose. They have additional recreational values for wilderness travel as well as for fishing and hunting due to their proximity to the Dalton Highway.

Ivishak tributaries: (Echooka, Flood Creek, Saviukviayak) These rivers also have scenic values and wildlife habitats of significance, and offer special recreational opportunities due to proximity to the Dalton Highway.

Tamayariak: This is another river that does not extend to the continental divide but does support ORV's for fish habitat, caribou calving and summer range.

Middle Fork of Chandalar: The upper reaches of this river extend to the continental divide in the southwestern portion of the Refuge and support scenic, and wildlife ORV's.

Stewardship of Existing Wild Rivers in the Arctic Refuge

We are very concerned about the lack of appropriate stewardship for the designated Wild Rivers (Wind, Ivishak, and Sheenjek rivers) of the Arctic Refuge that has occurred over that past 30 years that these designations have been in effect. Without any specific stewardship plans in place for any of these rivers, their outstandingly remarkable values have been compromised in several ways.

Rockets launched from the Poker Flat Rocket facility have been allowed to fall in the Refuge. The Wild Wind River corridor has been a primary impact zone. The inconsistency of this activity with Wild River status as well as refuge compatibility requirements has not been adequately addressed. A specific stewardship plan for the Wind River has never been developed. This situation must be addressed through the CCP revision process before any further permits for rocket impacts are considered.

The use of air boats by increasing numbers of sport hunters traveling up the Ivishak Wild River introduces excessive noise and degrades the wild river values. This use began as early as the 1990's and has steadily increased. Thus far, the Service has failed to address this situation, and has failed to protect the Ivishak Wild River through development of a specific river stewardship plan.

In 1980, the Sheenjek River was designated a Wild River and the surrounding lands were designated as Wilderness. Since that time, new airstrips have been developed in the absence of any specific

stewardship plans for this iconic and historic part of the Refuge. One of these airstrips is located on a dry alluvial fan where fragile vegetation has been destroyed, resulting in a significant scar that is now visible for miles away. The wild character of this designated Wild River has been seriously degraded in the absence of adequate stewardship by the Service.

We strongly recommend that such degradation of values, which the Service is mandated to preserve, be addressed in the revised CCP. There is a need to inventory all areas within the refuge that have or are being degraded by unregulated use. Specific actions to restore impacted areas must be identified, and commitments made to implement restoration measures must also be made in the CCP. Without reform of the past stewardship deficiencies in the Arctic Refuge, there is little to be gained by further designation of Wild Rivers.

Thank you for the opportunity to provide these comments.

Sincerely,

Fran Mauer
Alaska Chapter representative
Wilderness Watch