



March 4, 2008

Yukon Flats EIS Project Office
C/O ENSR
1835 Bragaw Street, Suite 490
Anchorage, AK 99508

To Whom it May Concern:

The National Wildlife Refuge Association (NWRA) appreciates the opportunity to comment on the **Proposed Land Exchange, Yukon Flats National Wildlife Refuge, Draft Environmental Impact Statement**. After detailed review, the NWRA cannot support the proposed action and, instead, recommends the No Land Exchanged Alternative.

The NWRA is a national membership organization, whose mission is to protect, enhance and expand the National Wildlife Refuge System (NWRS)—lands and waters set aside by the American people to conserve our diverse wildlife heritage. Our membership is comprised of current and retired Refuge System professionals, nearly 150 refuge Friends Affiliate organizations, including the Friends of Alaska National Wildlife Refuges, and thousands of concerned citizens across the nation. A cornerstone effort of the NWRA is the “Beyond the Boundary” initiative, which seeks to protect buffer zones and wildlife corridors that conserve the ecological integrity of refuges while linking them to other public and private conservation areas.

We thank the U.S. Fish and Wildlife Service for using the Environmental Impact Statement as a method to make this a public and transparent process. We commented earlier that an open process was necessary for the public to review this land trade. However, we were dismayed upon reading in your newsletter that you would only respond to comments “...that relate to missing or incorrect data used in analysis or methodology, identification of additional impacts, and recommendations for reasonable new alternatives.” While we agree with the need to offer substantive comments that will lead to a better document, we believe it’s also important to be able to state support for an alternative the meets the reviewer’s criteria. To do otherwise would be unfair to the Regional Director who must write a Record of Decision.

In evaluating the numbers of acres, quantity of wetlands, and miles of rivers that will be exchanged, it might be easy to conclude that this is a good trade for the refuge. However, a closer evaluation shows that,

1. Refuge lands (core area) that are not subject to threat at this time - and in fact are proposed wilderness - will be traded away and turned into an oil field.

2. The lands that are received in return face no practical threat. But if oil production is accomplished on the core area it will make it easier for Doyon to develop their other lands that are included within the refuge boundary. While the proposed development is on Doyon lands, it will require infrastructure to cross refuge lands and create major “beyond the boundary” problems for the refuge.

3. While land trades may lead to consolidation, this land trade actually cuts the refuge in half. As pointed out in the DEIS this could affect wildlife movement and the increased fire protection could change the ecotype and reduce the natural diversity of the area.

Clearly the magnitude and ramifications associated with this trade are greater than the sum of its parts.

The DEIS is deficient in several areas. It leaves a significant question in the area of appraisals. How do the appraisals fit into the decision- making process? In light of rising oil prices, will more land need to be offered up? In addition, will the subsurface estate be worth more than was originally thought at the beginning of this agreement?

We also question the legality of taking 26,500 acres of wilderness out of the proposal approved in the Comprehensive Conservation Plan (CCP) without redoing the CCP. There are certainly no lands with equivalent wilderness values being offered in trade.

Under the CCP there is a common management direction for the refuge to “...maintain a spirit of cooperation and good will with its neighbors and the public...” In each of the public meetings in the villages it became clear that those who lived within or proximate to the refuge boundaries are opposed to the trade with Doyon, their Regional Corporation. Accordingly, it appears that the trade would put the Service in direct confrontation with its neighbors and the refuge CCP.

In conclusion, there are too many cumulative impacts, many pointed out in the DEIS, to finalize this agreement. The Service cannot in good conscience, make a trade that will cut the refuge in half, put an oil field in an area that was once proposed wilderness, and open the door for more oil development in areas that affect the refuge directly and indirectly.

Consequently, the NWRA does not support the proposed action and supports the No Land Exchanged Alternative.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan Hirsche', with a long horizontal flourish extending to the right.

Evan Hirsche
President