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To: Tom Melius and USFWS Alaska Region Staff
Yukon Flats EIS Project Office
c/o ENSR
1835 S. Bragaw Street, Suite 490
Anchorage, AK 99508-3438

Inre: Yukon Flats National Wildlife Refuge Proposed Land Exchange and
Draft Environmental Impact Statement (DEIS)

Dear Mr. Melius and USFWS Staff,

March 20, 2008

Alaska Backcountry Hunters and Anglers (AK BHA) strongly opposes the proposed land exchange between the Yukon Flats National Wildlife Refuge and Doyon Limited. AK BHA supports only the No Action Alternative in the DEIS.

AK BHA has at the core of its mission the conservation and protection of habitat that our fish and wildlife, and our future hunting and fishing opportunities, depend upon. In fact, our core mission is very similar to the purpose of the Yukon Flats National Wildlife Refuge, “to conserve fish and wildlife populations and habitats in their natural diversity...” etc.

We are therefore greatly alarmed that the USFWS appears to be endorsing a land exchange — that would facilitate oil and gas exploration and development on Refuge lands — that we believe directly conflicts with the Yukon Flats NWR purposes and the current Comprehensive Conservation Plan (CCP). Such a USFWS policy position also sets a precedent that could have far ranging effects on how we manage other Refuge lands. We are also very troubled with a DEIS that we find lacking in real information about possible future climate-change effects and how those effects relate to the true value of any lands traded to the Service.

Regarding climate change and how it is affecting lands within the Yukon Flats NWR right now, we simply don't know if any "priority" wetlands currently owned by Doyon that are traded to the Service as part of the proposed action plans in the DEIS, will in fact be productive wetlands in another twenty or fifty years. It is likely that the Refuge lowlands/wetlands will experience a continued drying that will cause a number of cascading trophic effects. AK BHA does not believe the DEIS fully considers and weighs the future impacts of climate change to these Refuge parcels, and whether or not the "equal value" assessments of these parcels will hold true in the near future. We firmly believe that it is more prudent for the Service to retain the upland lakes and habitat that would be traded to Doyon as part of this land exchange, amidst the unknowns of continued climate change.

AK BHA understands that under ANCSA and ANILCA various Native corporations have the right to develop their lands, and we support that right. We certainly do not oppose responsible development that provides jobs and economic stimulus to the state, and a product we all depend upon. We realize that if the No Action Alternative is selected as the preferred alternative that Doyon may still develop their lands within the Refuge boundaries and seek various ROWs to facilitate development and transportation.

However, for the Yukon Flats NWR to exchange one complete block of known oil and gas rich lands that is immediately adjacent to the Wild River portion of Beaver Creek, and in essence ensure development now of those lands, including likely development of the White-Crazy Mountains area that the CCP claims were to be considered for wilderness designation, goes against everything the Refuge stands for and what its purpose is.

Beaver Creek Wild and Scenic River is a national treasure utilized by many hunters and anglers looking for a float experience that is wild in nature and relatively inexpensive to do. It is considered North America's longest "road to road" float, with initial access off the Steese Highway to hundreds of miles of pristine waterways before the takeout along the Yukon River at the Dalton Highway bridge. Ensuring development flanking this Wild-and-Scenic River corridor — which this land trade would do — is just not in keeping with the goals and purpose of the Service.

The Yukon Flats NWR also has a responsibility to the subsistence users of the Refuge, and even though most of those users are Doyon shareholders,

the majority of the subsistence users within the Refuge oppose this land trade. That is evident in the many resolutions passed by village councils within the Refuge in opposition to this land trade.

The possible negative impacts to fish and game and hunting and fishing if this land trade were to go through, to subsistence culture, to wilderness recreation, and to the future quality and quantity of waters within the Refuge, outweigh the benefits of acquiring other lowland parcels, and we hold to the position that the proposed actions are not at all compatible with the purpose and mission of the Yukon Flats NWR and the CCP.

AK BHA urges the USFWS to **select the No Action Alternative**.

Thank you very much for the opportunity to comment.

Sincerely,

Mark Richards

Co-chair Alaska Backcountry Hunters and Anglers

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