



THE WILDLIFE SOCIETY ALASKA CHAPTER

Kris Hundertmark, President
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The Alaska Chapter of The Wildlife Society is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

29 April 2010

Sharon Seim
U.S. Fish and Wildlife Service
Arctic National Wildlife Refuge
101 12th Ave., Rm 236
Fairbanks, AK 99701-6237

Dear Ms. Seim:

The Alaska State Chapter of The Wildlife Society (TWS) would like to comment on revision of the Arctic National Wildlife Refuge's Comprehensive Conservation Plan (CCP). TWS adopted a position statement on management of the 1002 Area of the Arctic Refuge in 2001 and revised that position in 2009¹. Elements of our position statement pertain to the entire Refuge and are relevant to the current planning process. TWS position statements on global climate change and wildlife are also relevant to the CCP².

Our position statement on the Arctic Refuge highlighted that the purposes of the Refuge as established in the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 include:

1. To conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine Caribou Herd, polar bears, grizzly bears, muskoxen, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds, Dolly Varden, trout, grayling, whitefish, and burbot.
2. To fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats.
3. To provide, in a manner consistent with the purposes set forth in subparagraphs i and ii, the opportunity for continued subsistence uses by local residents.
4. To ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph i, water quality and necessary water quantity within the Refuge.

¹ <http://joomla.wildlife.org/documents/positionstatements/32-ANWR.pdf>

² <http://joomla.wildlife.org/documents/positionstatements/35-Global%20Climate%20Change%20and%20Wildlife.pdf>

Because these purposes remain the highest management priorities for the Refuge, TWS recommends they be fully addressed in the CCP.

Aside from resource development, climate change is likely to have the greatest effect on arctic ecosystems in the coming decades. Our position statement on the Arctic Refuge recognizes "...there is considerable scientific and cultural value in maintaining undisturbed arctic regions where effects of long-term global changes can be identified and distinguished from localized human influence." Our position statement on global climate change and wildlife advocates that agencies consider climate change in long-range planning, and that monitoring programs be implemented to assess climate related changes in ecosystems. We also advocate minimizing ecosystem perturbations such as habitat fragmentation that could exacerbate the effects of climate change on wildlife populations

In light of these position statements we feel the CCP should provide an adaptable framework by which Refuge staff can respond to a changing environment. We think it can do so in three ways. First, the CCP should recognize the importance of maintaining the Refuge in an undeveloped state so that large, contiguous ecotypes remain intact. This will help insure that as habitats shift, wildlife will have a better opportunity to adapt to ecosystem change. This is especially important because resource development that has occurred or is planned elsewhere on the Arctic Coastal Plain may limit availability of intact ecosystems in other areas. Second, we recommend the CCP provide flexibility should climate change require management actions to maintain arctic wildlife or their habitats. We do not know what effects climate change may have on wildlife and cannot predict what management activities (e.g. exotic plant control or other vegetative manipulations to enhance habitats or populations) could become necessary for the Refuge to fulfill its purposes as stated in ANILCA. Therefore, we think it important that the CCP not preclude unforeseen management activities that may become necessary in the future. Finally, we believe that the CCP should emphasize the importance of research and monitoring on the Refuge to assess the effects of climate change on arctic wildlife. There is a substantial amount of baseline information on wildlife populations and habitats of the Arctic Refuge thanks to studies on the 1002 Area, elsewhere in the Refuge, and in adjacent areas. That baseline information is most useful if there is continued monitoring of wildlife populations and their habitats, assessment of species distributions, and measurement of climate variables on the Refuge. The CCP should encourage collaboration with academic institutions and continued cooperation with other government agencies in monitoring and research programs that address wildlife populations, ecosystem function, and the effects of climate change.

We note the current CCP for the Arctic Refuge was adopted in 1988 and has not been revised since. Therefore, we think it important that a mechanism for periodic revision be incorporated in the Plan and that reviews occur at least every 15 years as mandated by the National Wildlife Refuge System Improvement Act of 1997.

The Wildlife Society fully supports a review and revision of the Arctic Refuge CCP, wishes you the best during the process, and looks forward to reviewing the draft plan.

Sincerely,



Kris Hundertmark, Ph.D.
President