



Friends of Alaska National Wildlife Refuges
National Friends of the Year 2010
www.alaskarefugefriends.org

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Koyukuk NWR

Nowitna NWR

Selawik NWR

Tetlin NWR

Togiak NWR

Yukon Delta NWR

Yukon Flats NWR

May 12, 2023

Re: **Notice #P-2023-01**

Friends of Alaska National Wildlife Refuges (Friends) is a 501(c)(3) non-profit corporation that supports all 16 National Wildlife Refuges in Alaska on a voluntary basis. We request that the DEIS for **Notice #P-2023-01, Port of Alcan replacement** analyze the **full range of impacts on the Tetlin National Wildlife Refuge**, particularly impacts to the recreational, subsistence, historical, and watershed resources of the Refuge. All proposed actions and alternatives must adhere to the purposes and legal requirements embodied in the Alaska National Interest Conservation Lands Act (ANILCA), especially the provisions governing subsistence and the transfer of lands from and to a federal conservation unit.

Alternative 1. This alternative would remove 10 Refuge acres from Conservation Status, obliterating the Airs Hill Trailhead and blocking public access. This impact on the human and natural environment must be addressed in the DEIS and propose mitigation, such as moving the trailhead and parking area and acquiring mitigation acres. This is the Refuge's longest trail with a planned one-mile extension that will connect the highway to the Refuge's historic Mirror Lake public use cabin, making it the only Refuge cabin that is hiking accessible.

Alternative 2. We have major concerns about this alternative. The DEIS must address the impact of moving the Port of Entry four miles up the highway, which would locate key refuge recreational, historic, and subsistence assets on the "wrong" side of the port of entry. The EIS must address **how the relocation of Port Alcan will affect human access to the Refuge**. This proposed relocation may deter visitors and subsistence hunters from going through a relocated Port Alcan to access Desper and Scottie Creeks and other refuge lands adjacent to those four miles of the Alcan Highway. It should also address potential impediments to the transport of firearms through the relocated Port because this is a hunting area and many visitors carry guns for bear protection. It should explicitly describe the requirements for identification/documentation by Refuge visitors who must return through the port of entry.

Scottie and Desper creeks are among the Refuge's most important recreational assets. Therefore, a thorough analysis must address:

- The canoe routes that offer an opportunity for a loop trip and access to the lake country of the Refuge. Canoes can be launched at either Desper or Scottie Creek, and Desper also has a boat launch suitable for skiffs. Friends has led three trips to this area.
- Scottie and Desper creeks important access for both subsistence and sport hunting.
- The Refuge's Scottie Creek highway crossing also contains a historic cabin that the Refuge has stabilized and repaired for public use. This must be addressed under historical resources.

Thank you for the opportunity to comment. Please include us on your mailing list for this project info@alaskarefugefriends.org.

Sincerely,

A handwritten signature in black ink that reads "David C. Raskin". The signature is written in a cursive, flowing style.

David C. Raskin, Ph.D.
President
Friends of Alaska National Wildlife Refuges