



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## ANILCA Implementation Program

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February 19, 2014

Steve Delehanty, Refuge Manager  
Alaska Maritime National Wildlife Refuge  
95 Sterling Highway, Suite 1  
Homer, AK 99603

Dear Mr. Delehanty:

The State reviewed the December 5, 2013, scoping notice regarding the US Fish and Wildlife Service's (Service) intent to address unauthorized grazing by cattle on Wosnesenski and Chirikof Islands within the Alaska Maritime National Wildlife Refuge. The following comments represent the consolidated views of the State's resource agencies.

The scoping notice indicates the Service intends to prepare either an Environmental Assessment (EA) or Environmental Impact Statement (EIS). Historically, the management of the cattle on Wosnesenski and Chirikof Islands has been a contentious issue and recent scoping meetings held by the Service indicate that that has not changed. It is also a complex issue that deserves careful consideration. We therefore support developing an EIS that objectively evaluates a full range of reasonable management options instead of the more limited considerations evaluated in the context of an EA.

The cattle that inhabit Wosnesenski and Chirikof Islands were brought to the islands well before the creation of the Alaska Maritime National Wildlife Refuge. A genetic study published by the U.S. Department of Agriculture and other agencies in 2007 determined that the cattle on Chirikof Island were genetically unique and could potentially benefit the cattle industry (MacNeil et al. 2007). The study also determined that the Chirikof cattle were most closely related to Siberian Yakut Cattle, which is classified as an endangered breed by the Food and Agricultural Organization of the United Nations. The cattle on these islands have proven their ability to thrive in harsh conditions and if allowed to remain on these islands under active management they could become a resource for genetic diversity, a potential brood source for Alaska's cattle industry, a food source for Alaskan residents, and if disease were to affect Alaska's cattle industry, a quarantined replacement herd.

However, an equally important consideration is the potential for livestock to cause significant adverse impacts to cultural resources - prehistoric archaeological sites in particular. Impacts may

result from trampling, linear rutting, overgrazing, and wallowing, which contribute to accelerated erosion and overall site degradation. As the Service considers how to proceed with the unauthorized grazing activities in the Refuge, we strongly encourage careful consideration of ways to avoid, minimize, or, if necessary, mitigate the effects of livestock activities in and around cultural resource sites. As a federal undertaking, the Service is required to conduct review and consultation under Section 106 of the National Historic Preservation Act (NHPA). Additionally, Section 110 of the NHPA requires that each Federal agency establish a preservation program that ensures historic properties under the jurisdiction or control of the agency are identified, evaluated, nominated, and protected. We look forward to continued consultation with the Service and other consulting parties on this undertaking.

The scoping notice indicates the EA or EIS will be developed in compliance with the requirements of the National Environmental Policy Act (NEPA), which includes identifying purpose and need, describing the affected environment, and conducting an effects analysis. The notice indicates that cattle ownership and compatibility with the purposes of the refuge will also be addressed. We request the NEPA document include an alternative that evaluates allowing the animals to remain on the islands under active management - similar to the allowance of wild horses, burros, and cattle on other refuge lands, including those on the Chincoteague National Wildlife Refuge and Assateague Island, where the use was successfully balanced with the protection of important cultural resources and migratory bird habitat.

The NEPA document should also include an alternative that considers the live removal of cattle to other locations. Any removal would need to be conducted in consideration of animal welfare. Alternatives that evaluate killing the cattle should also consider utilizing the harvested animals as a human food source as many remote communities in Alaska lack secure food sources and would benefit from receiving the harvested meat. In particular, area residents have indicated they currently use the Wosnesenski herd as a food source. Both the NEPA document and the ANILCA 810 analysis need to evaluate the impacts of the alternatives on that and other subsistence uses.

Many of the remote islands in the Alaska Maritime Wildlife Refuge have an extensive history of species that were introduced for a variety of reasons, including for economic, subsistence and recreational purposes. We therefore request the NEPA document also include an inventory of introduced species on these two islands, along with background information that provides the reasons for their introduction and whether those reasons are still relevant. We also request the Service articulate reasons for removing the cattle at this time when the cattle have been on the islands since long before the refuge was established, and whether this decision would have a bearing on the removal of introduced species elsewhere. For example, Sitka black-tailed deer, Roosevelt elk, caribou, and reindeer have been introduced on other refuges in Alaska. Decisions to remove introduced species need to be based on and explained with clear and measurable metrics. The NEPA document should also evaluate whether any other introduced species on these two islands, similar to the cattle, exhibit genetic uniqueness worthy of continued conservation due to their isolation, and if so, what steps will be taken to preserve the population's genetic uniqueness.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, prominent capital 'M'.

Susan Magee  
ANILCA Program Coordinator