



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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May 28, 2026

Koyukuk Wildlife Refuge
Northern Interior Refuge Complex
Attention: Refuge Manager
101 12th Avenue, Room 206, Federal Building
Fairbanks, AK 99701

Submitted via email to kanuti@fws.gov

Re: Iron Dog Snowmachine Race Draft Compatibility Determination

Dear Refuge Manager,

The State of Alaska (State) reviewed the U.S. Fish and Wildlife Service's (USFWS) draft Compatibility Determination (CD) regarding the Iron Dog Snowmachine Race within Koyukuk National Wildlife Refuge (NWR). The proposed race route would cross refuge lands via snowmobile (or "snowmachine") along a designated trail for a short portion of the winter season. Within Koyukuk National Wildlife, the proposed racecourse would occur for approximately 109 miles within the refuge's borders, and approximately 79 miles would occur on Refuge-owned lands, following the existing designated winter trail that connects communities across interior and northwest Alaska. The overall race would occur on adjacent lands under other Federal, State of Alaska, or private ownership. The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

The State concurs with the USFWS's determination that the use of refuge lands is compatible with the purposes of Koyukuk National Wildlife Refuge as established through the Alaska National Interest Lands Conservation Act (ANILCA), Section 302(5)(B). The State supports authorizing this reroute to ensure the continuity of this iconic Alaskan tradition and expand connectivity among rural communities.

However, to prevent game wastage during competitive events—such as a recent incident during the Iditarod where a competitor's poorly managed Defense of Life or Property (DLP) take resulted in a moose carcass becoming inedible—the Iron Dog permit stipulations should explicitly require immediate field salvage and clear accountability timelines. The State requests the USFWS issue compatibility determinations that broadly cover traditional racing activities or utilize existing winter recreation CDs and incorporate these recommended stipulations into future special-use race permits, rather than issuing standalone compatibility determinations for individual races.

Additionally, by utilizing existing winter recreation CDs and reducing costly agency monitoring fees, USFWS can maintain regional consistency with other Alaska Refuges, protect state wildlife resources, and expeditiously authorize event reroutes.

State of Alaska Lands and Interests

DNR has determined that all of the proposed uses on State lands, including RS 2477 rights-of-way and submerged lands of navigable waters, would be covered under the Iron Dog permit (LAS 33934) that was issued through the South-Central Regional Office.

Questions related to permitting, or allowed uses on State lands can be directed to the DNR South-Central Regional Office at dnr.scro.permitting@alaska.gov, or by phone at 907-269-8552.

Wildlife Concerns

ADF&G reviewed the wildlife information provided by the USFWS as well as the enforcement of Defense of Life or Property (DLP) race rules:

- Correction to wildlife encounters (Page 8): The draft document states, “Caribou are the species most likely to be encountered. The race passes through the core wintering area of the Galena Mountain Caribou Herd and...” This is not accurate. Although the route traverses the winter range of the Galena Mountain Caribou Herd, there are likely only 100–150 animals in that herd. Conversely, there are estimated to be 10,478 ($\pm 1,572$) moose in GMU 21D. The proposed route will pass through some of the highest density moose areas in Unit 21D Unit 21D (3-4 moose/mi²). Therefore, the likelihood of encountering, disturbing, or colliding with a moose is significantly greater than with caribou. Also, this proposed trail is unlike the current trail through most of 21D, which runs primarily along the wide, open route along the Yukon River. This inland trail is much narrower, increasing the likelihood of encountering moose without warning. Please revise to indicate moose are the species most likely to be encountered.

Refuge Stipulation #25 Salvage Requirements

While a high-speed collision with an animal would likely disable a vehicle and end a racer's run at the next checkpoint, our primary concern is preventing human-wildlife conflicts that result in lethal take. Our recommended stipulation below is intended to affect only DLP situations.

Stipulations should more clearly require adequate salvage of any animal taken by DLP or struck in a collision. For context, two years ago a front-running Iditarod musher shot a moose (DLP) near Galena. The musher gutted the moose poorly and reported it in Nulato, leaving it un-salvaged for two days while relying on Iditarod officials to handle the logistics. By the time a Galena resident reached the carcass, the meat was inedible despite the winter conditions. The musher was not cited because race officials had assumed responsibility. To prevent similar game wastage, the Iron Dog race rules should be more explicit.

We recommend amending Refuge Stipulation #25 to require that "an animal must be salvaged out of the field before the racer proceeds from the next checkpoint following a DLP or collision." Enforcing this strict timeline ensures that competitive racers will exhaust all other practical options before resorting to lethal force. At a minimum the following State salvage requirements should be explicitly included in Stipulation #25:

- 1) You have exhausted every other practicable method to avoid or de-escalate the situation before resorting to lethal force.
- 2) **Salvage the Remains:** You must salvage and turn over specific animal parts to the state. For bears, this includes the skull and the entirely removed hide (with all attached claws); for ungulates, this includes the meat, horns, or antler. [emphasis added]
- 3) Submit a completed questionnaire¹ to ADF&G within 15 days describing the circumstances of the take.

Fisheries

We have no concerns with the proposed Iron Dog reroute from a fisheries management perspective. The race occurs in the dead of winter and the affected waterbodies will be frozen. According to the proposal, sufficient absorbent materials will be available to quickly contain and clean up any accidental fuel spills on ice. Consequently, adverse impacts on fish and fisheries are expected to be negligible.

Management Consistency Across Alaska Refuges

The draft CDs unnecessarily treat the Iron Dog race as an entirely novel, high-impact use, ignoring decades of established management history and existing general compatibility determinations for winter motorized recreation across multiple Alaska refuges:

- **Selawik NWR:** As noted in the 1987 Comprehensive Conservation Plans (CCPs) and subsequent re-evaluations (2011), winter snowmachine/snowmobile use is a traditional and compatible method of transportation and recreation. Furthermore, the Willie Goodwin/Archie Ferguson Memorial Race has safely operated within the Selawik NWR since the early 1970s. Because snowmobile racing began prior to ANILCA, it should be considered a traditional and compatible activity. The USFWS has previously acknowledged in the Selawik *Snowmobiling CD* that this event has no biological impacts on the Refuge because it utilizes existing inter-village trails, does not significantly increase overall traffic, and is of short duration.
- **Koyukuk NWR:** The Koyukuk NWR explicitly found snowmobiling compatible in its *Non-Wildlife Dependent Recreational Activities CD* in 2009.
- **Innoko NWR:** The Innoko NWR evaluates winter snowmobile use—including substantial event-related snowmobile traffic overlapping with the Iditarod Trail and associated snowmobile corridors—under its general *Snowmobiling CD*. It is our understanding that Innoko NWR does not require a separate, standalone CD for individual race events, recognizing that the temporary nature of the traffic does not alter the underlying compatibility of winter snowmobile access.
- **Yukon Flats NWR:** This refuge accommodates competitive winter motorized events, such as the Yukon-Draanjik 150 snowmobile race. Like the Iron Dog, the Yukon-Draanjik 150 relies on frozen river corridors and established winter trails traversing refuge lands. It is our understanding the USFWS has historically authorized and

¹ https://www.adfg.alaska.gov/static/license/otherlicense/pdfs/defense_life_property_game_animal_kill_report.pdf

monitored regional events under existing winter recreation and access CDs without requiring separate potentially cost-prohibitive CD stipulations for every distinct race event.

Imposing an entirely different standard and cost for the Iron Dog reroute through the Selawik and Koyukuk NWRs creates regional inconsistency within the National Wildlife Refuge System in Alaska. USFWS should maintain consistency and recognize snowmachining in the Selawik and Koyukuk reroutes as compatible under the existing Selawik *Snowmobiling* and Koyukuk *Non-Wildlife Dependent Recreational Activities* CDs.

Monitoring Costs

The State understands that USFWS initially denied the permit for this reroute. While the issuance of the draft CDs is a step forward, the State is concerned that the Service is substituting an outright denial with potentially cost-prohibitive monitoring stipulations.

- **Minimal and Localized Impacts:** The Service's own documentation underscores the anticipated impacts of snowmachine use on vegetation and wildlife (such as moose, caribou, and denning brown bears) are minor, localized, and temporary.
- **Identical Operational Footprints and Participant Profile:** The Iron Dog race operates under parameters that align closely with general winter recreation in Alaska. The vast majority of Iron Dog racers, including winners, are regular Alaskans, from across the state, with day jobs who routinely use and practice on community trails throughout the winter season. They are not utilizing an exclusive, closed racecourse with continuous race organization or public notices on the trail during their preparation; rather, they are part of the standard winter trail user base. The race utilizes well-established inter-village winter trail systems during periods of adequate snow cover (exceeding the required six-inch minimum under 50 CFR 36.32).
- **Sufficient Existing Resources:** Refuges have adequate personnel and base operational funds are already available to monitor winter trail use via routine overflights and community communication.
- **Monitoring Costs:** Because the race is a short-duration, temporary event occurring on existing trail corridors and raced primarily by regular Alaskans, we question the need to impose costly monitoring on the event organizers. For example, we question the Refuge's need for 50K for two new snowmachines to monitor the event and recurring annual monitoring expenses of 25K.

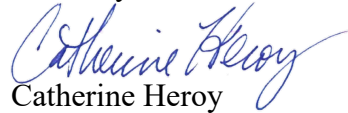
Closing

Thank you for the opportunity to review and comment on the draft Compatibility Determination. The Iron Dog Race is an important winter tradition that supports local economies and reinforces essential inter-village connectivity across rural Alaska. Because snowmachining is a foundational component of traditional access under ANILCA, and existing compatibility determinations already cover winter trail events, executing a separate CD process is an unnecessary expenditure of both agency and applicant resources.

The State urges the USFWS to adopt our recommended special use permit stipulations to establish clear, enforceable human-wildlife conflict and salvage protocols. Furthermore, the Service should eliminate cost-prohibitive monitoring requirements to align its regional management with precedents set by the Selawik, Koyukuk, Innoko, and Yukon Flats NWRs. By incorporating these short-duration winter events into existing *Snowmobiling* or *Non-Wildlife Dependent Recreational Activities* CDs, the USFWS can maintain consistency across Alaska Refuges and expeditiously issue the special use permits for the reroute.

Please contact me at (907) 269-0880 or by email at catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,



Catherine Heroy
Federal Program Manager