



**Izembek National Wildlife Refuge: Land Exchange/Road  
Corridor  
Draft Environmental Impact Statement Comments**

**Audubon Alaska**

May 3, 2012 in Anchorage, Alaska

Thank you for the opportunity to comment on the proposed Izembek National Wildlife Refuge Land Exchange and Road Corridor project.

My name is Beth Peluso, and I represent Audubon Alaska, the state office of the National Audubon Society. We have had an Alaska Office since 1977. Audubon and our membership have been actively engaged in issues concerning the conservation of the important bird and wildlife habitat in the Izembek National Wildlife Refuge for more than a decade.

Audubon Alaska supports Alternative 1: No Action. Since 1997, Audubon has maintained that there are marine transportation options that would meet the concern for medical emergency transportation for the community of King Cove. When in service, the existing hovercraft system successfully completed more than 30 medical emergency evacuations, proving that it sufficiently addressed this problem without compromising the integrity of the Izembek refuge.

Since 1985 the U.S. Fish and Wildlife Service has consistently found that a road across the narrow isthmus between Izembek and Kinzarof lagoons would be incompatible with the purposes for which the Izembek refuge had been established and that a road would cause significant, long-term damage to important fish and wildlife habitat and the wilderness values of the refuge.

### **Importance of Izembek National Wildlife Refuge**

Congress has provided "Wilderness" designation, one of the highest possible levels of protection, for the portion of the Izembek refuge under consideration.

Izembek and Kinzarof lagoons and the surrounding watersheds, separated by a narrow isthmus, make up the ecological heart of Izembek refuge. This relatively small area has been repeatedly recognized for its global significance. In 1986, President Reagan named Izembek as the first Wetland of International Importance in the U.S. under the Ramsar Convention on Wetlands. In 2001, BirdLife International, in cooperation with the National Audubon Society, recognized Izembek as an Important Bird Area of global significance.

Izembek refuge is best known for its world-class waterfowl and shorebird populations and habitats, supporting hundreds of thousands of birds that migrate to the Lower 48 and other continents. The lagoons complex provides wintering, breeding, molting, or resting grounds for:

- nearly the entire Pacific Coast population of Brant, including birds from Canada, Russia and Alaska;
- more than half the world population of Emperor geese, which have a range limited to Alaska and parts of Russia;
- up to 70 percent of the world population of Steller's eiders. The Alaska breeding population is listed as threatened under the Endangered Species Act;
- many species of other shorebirds, including Pacific Golden-Plovers, Rock Sandpipers, Dunlins; and
- a resident population of Tundra Swans.

Many of the avian species using Izembek—including Dunlin, Brant and Steller's Eider—are recognized on Audubon's Alaska WatchList of declining and vulnerable bird populations.

The lagoons complex is unique habitat due to the presence of the world's largest eelgrass beds. Waterfowl graze on the eelgrass and shorebirds prey on the invertebrates associated with the eelgrass and intertidal mudflats. Eelgrass provides food and cover for commercially important fish and shellfish. The enormous productivity of the eelgrass beds in Izembek Lagoon and other lagoons on the Alaska Peninsula is key to the productivity of the larger Bering Sea ecosystem.

The importance of the lagoons complex cannot be overstated. Migrating and wintering Brant fly between the lagoons to forage; migrating and wintering Emperor Geese often forage on the isthmus for berries; and wintering and molting Steller's Eiders use Kinzarof Lagoon. Resident Tundra Swans nest in small wetlands and molt on the larger lakes on and near the isthmus. Marine mammals use the lagoons, including large numbers of threatened northern sea otters near the entrance to Kinzarof, and threatened Steller's sea lions on the barrier islands of Izembek Lagoon.

The narrow isthmus between Izembek and Kinzarof lagoons is the only path between the west and east sides of the refuge for such wide-ranging species as brown bears and caribou. The Alaska Peninsula Caribou Herd uses the isthmus as its primary migration route between calving and wintering areas. Some of the highest densities of brown bears on the lower Alaska Peninsula are found in the Joshua Green River Valley, an area within three miles of the proposed road corridor. These bears frequently roam the isthmus searching for food. Low levels of human disturbance have helped maintain the high habitat value of this area for brown bears.

Numerous small streams along the north shore of Kinzarof Lagoon provide access routes to upland lakes for spawning sockeye salmon.

### **Harmful Impacts of a Road**

Construction and use of a road would impact a wide range of avian species year-round, with major effects on nearly the entire Brant population of the Pacific Flyway, more than half the global population of Emperor Geese, and on Tundra Swans and Common Loons. Concern about impacts on subsistence harvests extends beyond the Izembek area to the Yukon-Kuskokwim (Y-K) Delta, where many Alaska Native residents are dependent on Brant as a key subsistence resource. Negative effects of the road are compounded by the narrow isthmus, so it would be difficult for wildlife to avoid the road.

Increased human presence, especially when the energetic needs of wildlife are high (molting, nesting, and pre-migration for birds; calving season for caribou) would have a negative impact on these populations. Another possible impact is the increase of predators that adapt easily to human activity, such as Common Ravens, gulls, and foxes, which would increase predation pressure on birds during nesting and molting seasons.

### **Exchange Lands**

The proposed exchange lands in alternatives 2 and 3 would not provide habitat comparable to or compensate for the loss or degradation of the Izembek-Kinzarof lagoons complex. Fundamentally, this is not an issue that can be resolved on the basis of acreage: no amount of exchange lands can compensate for the unacceptable and irreversible impacts of a road on globally significant and unique wildlife habitats, which are the very heart of Izembek refuge.