

## ADDENDUM

Alaska's Izembek National Wildlife Refuge:

A Land Exchange and Road are Not in the Public Interest

The internationally significant wildlife and wetland values of Izembek National Wildlife Refuge should not be compromised. Located at the southern end of Alaska's peninsula, the Izembek Refuge lies between the waters of the Bering Sea and the Gulf of Alaska. Within the heart of the Refuge is the Izembek and Kinzarof Lagoons complex, a 30-mile long and 5-mile wide coastal ecosystem that is a haven for more than 200 species of wildlife and nine species of fish. Recognizing the global significance of this wetlands ecosystem, President Reagan established the Izembek lagoons complex as the first ever U.S. designated Ramsar site. For close to three decades the Department of the Interior has served as a wilderness steward for this valuable wildlife resource; now it must continue to ensure its long-term protection.

The combination of eelgrass beds in the lagoons complex and wetlands habitat on the isthmus separating the two lagoons creates extremely high habitat value for entire populations of birds and all of the wildlife species that inhabit the refuge. Hundreds of thousands of migratory waterfowl and shorebirds find food and shelter in the lagoons and freshwater wetlands on their way to and from their sub-arctic and arctic breeding grounds. The importance of the eelgrass meadows, not only to the Izembek ecosystem, but to populations of waterfowl that migrate to the lower 48 states, cannot be understated.

The lagoons complex supports fish, invertebrates, marine mammals, and threatened species such as Steller's eider and sea otters. Equally important, the isthmus separating the two lagoons is a vital migration corridor and foraging area for many species of wildlife. A road through this narrow isthmus would bifurcate this critical area and divide the only route that links brown bear denning areas to important foraging habitats. The Alaska Peninsula Caribou Herd, a population that has declined from about 10,000 to fewer than 1,000 in the last 10 years, uses the isthmus as its only migration corridor between calving and wintering grounds. The isthmus is also an important nesting area for Izembek tundra swans, essentially the only non-migratory population of tundra swans in North America.

It is the globally rare ecosystem in the lagoons complex that has been recognized for its international significance. In the proposed land exchange, neither of the two state townships, nor the majority of the two largest King Cove Corporation parcels on the east and west sides of Cold Bay provide comparable habitat importance. State township parcel #2 is entirely uplands with no wetlands values, and the other parcel #1 contains little waterfowl habitat value. Neither of these parcels contains eelgrass. The majority of the two largest King Cove Corporation parcels (parcels # 4 and 8) do not contain high value habitat for all species found on the refuge, nor the wilderness values found in the lagoons complex, as they are both impacted by roads. They also contain no caribou habitat value. There is simply no comparison between the exchange lands and the designated Wilderness in the heart of the refuge.

The proposed road would not only sever fragile refuge wetland habitat, it would also lead to the degradation of other significant ecological habitats. Construction and maintenance of the road will entail filling wetlands, modifying drainages, potential spillages and pollution, dust, noise, on-land barriers and over-land turmoil and disruptions. A June 2003 draft Environmental Impact Statement, prepared by the U.S. Army Corps of Engineers, examined the potential threats of the proposed road from King Cove to Cold Bay and documented the potential scope of the construction. The report identified the need for 36.7 acres of fill material in U.S. waters including wetlands, of which 2.09 acres are below the High Tide Line. There are also 254 stream and drainage crossings that would require 8 bridges and 19 culverts across fish-bearing streams. Road development also includes the placement of support facilities for the road, the size and location of which have yet to be determined. There will be a need for gravel sites or other support facilities. This level of construction and maintenance would alter the landscape and most likely change the hydrology of the wetlands and damage eelgrass meadows.

The disturbance created by the construction, maintenance and use of a road through the Izembek isthmus would weaken the ability of the Izembek ecosystem to adapt to the effects of climate change. Scientists predict that the effects of global warming on the world's sea grasses will be far-reaching and severe. As salinity, temperature, sea level and tidal patterns all fluctuate in response to climate change the eelgrass beds on both sides of the Izembek isthmus are likely to experience increasing damage. To help the eelgrass beds and the species that depend on them adapt to the unavoidable effects of climate change, all non-climate-related stressors must be avoided. Building a road would add severe stress to many species already struggling for survival in a region impacted by global warming and other threats.

Another significant concern is that once the land is transferred out of federal hands, the state could allow new development and construction projects. There has long been a concern that potential oil and gas development in and around the lands and waters near the lagoons complex over time could result in associated oil and gas development infrastructure being placed in the road corridor on the Izembek isthmus. While the legislation intends to restrict uses of the road, in the future the state might use the exchange lands not only for a road but also for commercial purposes, such as utility corridors, oil and gas pipelines, or any other support services needed for oil and gas development. All of these actions would result in a variety of changes to refuge management, requiring the U.S. Fish and Wildlife Service to undertake future compatibility determinations to ensure that the decision to trade away some refuge lands in exchange for new lands would continue to further all of the purposes of the refuge and the mission of the National Wildlife Refuge System.

The land exchange and a road through Izembek's wilderness lands undermines America's history of conservation and places Izembek National Wildlife Refuge, and all of America's protected wild lands, at risk of irresponsible and unnecessary development. Approval of this action is not in the public's interest.