



## **THE WILDLIFE SOCIETY**

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Stephanie Brady, Project Coordinator  
U.S. Fish and Wildlife Service  
1011 East Tudor Rd., MS-231  
Anchorage, AK 99503

Via email to [izembek\\_eis@fws.gov](mailto:izembek_eis@fws.gov)

Dear Ms. Brady:

The Wildlife Society appreciates the opportunity to submit scoping comments concerning the Environmental Impact Statement (EIS) for the proposed land exchange and road corridor through the Izembek National Wildlife Refuge (NWR) and its Congressionally-designated Wilderness.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

The Wildlife Society is concerned about the effects of this proposed road on wildlife and wildlife habitat. Construction of a road through the Izembek NWR would significantly threaten its native wildlife, and the proposed land exchange would fail to offer comparable protection or habitat for that which will be lost.

Izembek NWR provides habitat for a large array of wildlife. Federally threatened Steller's Eiders use the refuge, as do other migratory birds including Emperor Goose and Dunlin, which are declining and vulnerable in Alaska (Pacific Flyway Management Plan 2006, U.S. Shorebird Conservation Plan 2001). Nearly all of the world's Black Brant population uses this refuge during migration. Both the Emperor Goose and Pacific Brant are well below population goals identified in Pacific Flyway Management Plans for those species.

In 1986, Izembek NWR and Izembek Lagoon became one of the first sites in the United States recognized as a Wetland of International Importance. It is one of only 22 such sites in the country. Izembek Lagoon is identified as vital wading bird habitat within the Western Hemispheric Shorebird Reserve and East Asian-Australasian Shorebird Reserve networks. Izembek Lagoon also has one of the largest eelgrass beds in the world. Kinzarof Lagoon supports the largest beds of eelgrass on the south side of the Alaska Peninsula and is vital winter habitat for brant and Steller's Eider when Bering Sea estuaries are ice covered. These eelgrass beds


provides quality habitat for crabs, salmon, various juvenile fish, brown bears, sea otters, tens of thousands of shorebirds, and hundreds of thousands of waterfowl.

The proposed road would pass through an isthmus between Izembek and Kinzarof lagoons, a location representing a major wildlife migration corridor. The Southern Alaska Peninsula caribou herd, as well as brown bears and wolves, regularly use this corridor and it is core wintering habitat for the caribou. The road would also cut through nesting and molting habitat for a small, resident population of Tundra Swans, which are sensitive to human disturbance. Finally, this isthmus is located between the two rich ecosystems of Izembek and Kinzarof Lagoons. There is frequent wildlife traffic across the isthmus as waterfowl, brown bears, and other wildlife travel between the two lagoons.

According to the Fish and Wildlife Service's 1985 Comprehensive Conservation Plan for Izembek NWR, the proposed road could cause long-term, negative effects to refuge resources. Potential impacts include disruption of migratory waterfowl populations during molting, spring and fall staging and winter, and decreased productivity of caribou, Tundra Swans, and furbearers. Construction of a road may also increase the illegal use of ATVs on the refuge. Although only a partial road has been constructed on the east side of Cold Bay, according to some accounts illegal ATV use is already beginning to degrade wildlife habitat in wilderness areas to the east and northeast of Kinzarof Lagoon.

The Wildlife Society asks that you take into consideration these injurious effects on wildlife as you prepare the EIS for the proposed land exchange and road through the Izembek National Wildlife Refuge on the Alaskan Peninsula. Thank you for considering the views of wildlife professionals. Please feel free to contact Laura Bies, Director of Government Affairs, at [laura@wildlife.org](mailto:laura@wildlife.org) or at (301) 897-9770 x 308 if you need further information or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce D. Leopold".

Bruce D. Leopold, Ph.D.  
President