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March 31, 2010

Ms. Laurel Jennings
Exxon Valdez Oil Spill Trustee Council
441 West 5th Avenue, Suite 500
Anchorage, AK 99501

Re: Supplemental EIS Comment on the EVOS Trustee Council's Restoration Efforts

Dear Members of the Trustee Council:

The National for Center Conservation Science & Policy (NCCSP) is a 501(c) 3 non-profit conservation science and policy organization with a mission of creating science-based solutions to protect and restore the life processes and ecological vitality that sustains all lands, waters and communities. Our work focuses on two main program areas: Intact Ecosystems and Climate Change Preparation. The Exxon Valdez Oil Spill (EVOS) Restoration Plan adopted by the six-member state and federal EVOS Trustee Council (Council) is precisely the kind of conservation science and public policy undertaking that the National Center is designed to evaluate and assist as part of our Intact Ecosystems focal area.

In addition this comment role on EVOS restoration as president and chief scientist of the National Center, I had the opportunity to direct the World Wildlife Fund's (WWF) Exxon Valdez oil spill response on behalf of their 1.2 million members during the early and mid-1990s. In my work for WWF, I studied the EVOS restoration effort in detail and visited the Kodiak Archipelago that was the part of the spill region prioritized by WWF.

Habitat protection was our primary interest in oil spill restoration and in advocating for the purchase of Kodiak National Wildlife Refuge inholdings in 1992. At the time, I stated that the proposed acquisitions met the site selection criteria developed by the Council, especially that the coastal tracts under consideration for protection. The primary restoration benefits of the parcels can be summed as follows:

- contained key habitats for injured resources or services;
- protection of those habitats would benefit more than one injured resource or service;
- often contained critical habitat for depleted, rare, threatened, or endangered species;
- could function as intact ecological units or essential habitats with linkages to other elements in the greater ecosystem;
- adjacent land uses would not significantly degrade the ecological function of the essential habitats intended for protection;
- management of adjacent lands could easily be compatible with protection of essential habitats on parcels.

In addition to the above criteria, I would like to point out that the rainforests on Afognak Island are globally significant as they represent the northern terminus of coastal rainforests of North America that extend from Kodiak and Prince William Sound to northern California. Afognak's rainforests, in particular, are carbon dense ecosystems that store carbon for centuries, playing a role in mitigating the harmful consequences of global warming. These unique rainforests will be featured in my forth coming book – "temperate and boreal rainforests: ecology and conservation," which also calls for supporting more EVOS acquisitions and easements (Island Press, 2010).

Given the Council's stellar record of conserving 650,000 acres throughout the spill region through fee acquisition or conservation easements, I am very pleased that the Council designed and carried out a scientifically sound ecosystem-targeted restoration plan. With the Council's impressive habitat achievements in mind, the National Center now urges the Council to continue to meet the above criteria in all of its remaining habitat conservation investments especially as it relates to:

- the large parcel opportunity of Sitkalidak Island
- the critical small parcel opportunity of the lower Karluk River
- high quality rainforest and riparian habitat on Afognak Island

I would also strongly urge that the Council leverage its remaining habitat funds by encouraging that matching funds be committed from other government sources, including the Land and Water Conservation Fund, Forest Legacy Program, Federal Coastal Wetland Grants, North American Waterfowl Conservation Act grants, Brownfield grants (where applicable) and private foundation grants and carbon sequestration funding in forested areas of Kodiak Archipelago, Kenai Peninsula and Prince William Sound.

Also, as the desire to sell fee simple ownership interest in Native corporation and tribal lands diminishes in the spill region we urge the Council to utilize conservation easements to meet its habitat protection objectives. Easements tend to be less expensive and can thereby stretch the remaining oil spill settlement habitat funds.

In closing, I'd like to repeat an observation I made in a 2001 letter to the Alaska Department of Natural Resources regarding WWF's support for the ADNR and Old Harbor Native Corporation land exchange involving Sitkalidak Island and Kiliuda Bay property:

"The record of EVOS restoration in the (Kodiak) archipelago is second to none in working out a comprehensive approach that benefits coastal and marine habitats and wildlife."

Thank you for the opportunity for the National Center to comment on the Council's remaining habitat conservation decision-making.

Sincerely,

A handwritten signature in cursive script, reading "Dominick A. DellaSala".

Dominick A. DellaSala, Ph.D.
President and Chief Scientist
National Center for Conservation Science & Policy